

September 2007

NO CHILD LEFT BEHIND ACT

Education Should
Clarify Guidance and
Address Potential
Compliance Issues for
Schools in Corrective
Action and
Restructuring Status





Highlights of [GAO-07-1035](#), a report to congressional requesters

Why GAO Did This Study

The No Child Left Behind Act of 2001 (NCLBA) focused national attention on improving schools so that all students reach academic proficiency by 2014. In the 2006-2007 school year, about 4,500 of the 54,000 Title I schools failed to make adequate yearly progress (AYP) for 4 or more years. Schools that miss AYP for 4 years are identified for corrective action, and after 6 years, they must be restructured. GAO examined (1) the characteristics of Title I schools in corrective action and restructuring; (2) the actions that schools in corrective action and restructuring implemented; (3) the assistance those schools received from districts and states; and (4) how Education supports states in their efforts to assist these schools. GAO administered two Web-based surveys to a nationwide sample of schools in corrective action and restructuring status and conducted site visits to five states.

What GAO Recommends

GAO recommends that the Secretary of Education provide guidance on when schools in corrective action may continue previously implemented corrective actions rather than implementing new ones; direct states to report information on activities taken by each school in corrective action or restructuring; and take additional steps to ascertain whether states are ensuring that districts provide the required assistance to schools. Education agreed with these recommendations.

www.gao.gov/cgi-bin/getrpt?GAO-07-1035.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Cornelia Ashby at (202) 512-7215 or ashbyc@gao.gov.

NO CHILD LEFT BEHIND ACT

Education Should Clarify Guidance and Address Potential Compliance Issues for Schools in Corrective Action and Restructuring Status

What GAO Found

Nationwide, the 2,790 Title I schools that were in corrective action or restructuring status in the 2005-2006 school year were more frequently located in urban areas and in a few states. These schools served higher percentages of minority, poor, and middle-school students than other Title I schools, and many report that factors such as neighborhood violence and student mobility pose additional challenges to improving student academic performance. As state proficiency targets continue to increase to 100 percent in 2014, the number of schools in corrective action and restructuring may increase.

A majority of schools in corrective action or restructuring status implemented required activities. However, in some cases, schools may not be meeting NCLBA requirements. GAO estimates that 6 percent of schools did not take any of the required corrective actions and that about a third continued corrective actions implemented during earlier years of school improvement but did not take a new action after entering corrective action status. While this course of action may be an appropriate path for some schools to take, the Department of Education has not provided guidance to districts delineating when continuing a corrective action is appropriate and when it is not. In addition, about 40 percent of schools did not take any of the five restructuring options required by NCLBA. While states are required to report annually to the Department of Education the measures taken by schools in improvement status, Education does not require states to report on the specific measures taken for each school.

GAO estimates that 42 percent of the schools in corrective action or restructuring did not receive all required types of assistance through their school districts, although most received discretionary assistance from their state educational agencies. Districts are required to ensure that several types of assistance are provided to all schools in improvement status, including those in corrective action and restructuring status. This assistance includes help in analyzing students' assessment data and revising school budgets so that resources are allocated to improvement efforts. NCLBA generally does not require states to provide specific kinds of assistance to schools in corrective action or restructuring; however, they are required to develop a statewide system of support, including school support teams to provide technical assistance to schools and districts. Most schools received some type of assistance from the state educational agency.

Education provides technical assistance and research results to states primarily through its Comprehensive Centers Program. Education also has provided more material in its Web-based clearinghouse to address a greater number of topics and is developing an initiative to outline practical steps for schools in improvement, including those in restructuring.

Contents

Letter		1
	Results in Brief	3
	Background	6
	Schools in Corrective Action and Restructuring Were More Often Located in Urban School Districts and Served Higher Percentages of Minority, Poor, and Middle-School Students Than Other Title I Schools	13
	Most Schools Used a Corrective Action or Restructuring Option, but Some May Not be Meeting NCLBA Requirements	22
	Many Schools in Corrective Action and Restructuring Did Not Receive All Required Assistance through Their School Districts; However, Most Received Assistance from Their State	31
	Education Provides Technical Assistance and Research on School Improvement, Including Some Specific Information on School Restructuring	35
	Conclusions	38
	Recommendations	39
	Agency Comments and Our Evaluation	39
Appendix I	Scope and Methodology	41
	Objective 1: Analysis of School Characteristics	41
	Objectives 2 and 3: Implementation of Corrective Action and Restructuring and State and District Assistance	44
	Objective 4: Education's Efforts to Support State Implementation	50
Appendix II	Number of Schools in Corrective Action, Planning for Restructuring, and Implementing Restructuring, by State in 2005-2006 and 2006-2007	51
Appendix III	Comments from the Department of Education	53
Appendix IV	GAO Contacts and Acknowledgments	55
Related GAO Products		56

Tables

Table 1: Timeline for Implementing Interventions for Schools That Do Not Make Adequate Yearly Progress	8
Table 2: Allowable Activities for Schools in Corrective Action and Restructuring	9
Table 3: NCLBA Technical Assistance Districts Are Required to Ensure for Schools Identified for Improvement, Including Those in Corrective Action and Restructuring	10
Table 4: Education, State, and District Responsibilities for Monitoring States, Districts, and Schools Identified for Improvement	12
Table 5: Percentage of Schools in Corrective Action and Restructuring and All Other Title I Schools in 2005-2006, by Locale	14
Table 6: Percentage of Schools Nationwide in Corrective Action and Restructuring in the Top 5 School Districts in School Year 2005-2006	14
Table 7: Percentage of Students with Selected Characteristics, Comparing Schools in Corrective Action and Restructuring with All Other Title I Schools, by Locale	17
Table 8: Percentage of Schools in Corrective Action and Restructuring Compared to All Other Title I Schools, by Grade Level	18
Table 9: Grade Level Definitions	42
Table 10: School Districts Selected for Site Visits	49
Table 11: Number of Schools in Corrective Action, Planning Restructuring, and Implementing Restructuring, by State in 2005-2006 and 2006-2007	51

Figures

Figure 1: Number of Title I Schools Identified for Corrective Action, Planning for Restructuring, and Implementing Restructuring in 2005-2006	13
Figure 2: Number of Schools in Corrective Action and Restructuring in School Year 2005-2006, by State	15
Figure 3: Number of Schools in Corrective Action and Restructuring for the 3 Most Recent School Years	19
Figure 4: Change in the Number of Schools in Corrective Action and Restructuring from 2005-2006 to 2006-2007, by State	21
Figure 5: Corrective Actions Allowed under NCLBA and Estimated Percentage of Schools That Implemented Each Action in 2005-2006	23
Figure 6: Restructuring Options Allowed under NCLBA and Estimated Percentage of Schools That Implemented Each Option	25
Figure 7: Among Schools Implementing “Other” Major Restructuring, Estimated Percentage of Schools Implementing Various Activities	27
Figure 8: The Estimated Percentage of Schools in Corrective Action and Restructuring That Received Each Form of Required Technical Assistance through Districts in School Year 2005-2006	32
Figure 9: Estimated Percentage of Schools in Corrective Action and Restructuring in 2005-2006 That Received State Assistance	35
Figure 10: Education’s Content and Regional Centers	36

Abbreviations

AYP	adequate yearly progress
CCD	Common Core of Data
CSPR	Consolidated State Performance Reports
Education	Department of Education
ESEA	Elementary and Secondary Education Act of 1965
IASA	Improving America's Schools Act of 1994
NCLBA	No Child Left Behind Act of 2001
SES	supplemental education services

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United States Government Accountability Office
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September 5, 2007

The Honorable Edward M. Kennedy
Chairman
The Honorable Michael B. Enzi
Ranking Member
Committee on Health, Education, Labor, and Pensions
United States Senate

The Honorable Christopher J. Dodd
Chairman
The Honorable Lamar Alexander
Ranking Member
Subcommittee on Children and Families
Committee on Health, Education, Labor, and Pensions
United States Senate

Over the past 40 years, the Elementary and Secondary Education Act of 1965 (ESEA) has authorized billions of dollars in federal grants to states and school districts to improve educational opportunities for economically disadvantaged students. Despite this investment, the academic performance of disadvantaged students is still substantially lower than that of more advantaged students. Congress, with the enactment of the No Child Left Behind Act of 2001 (NCLBA)¹—the most recent reauthorization of ESEA—sought to address this issue by holding public schools accountable for the academic performance of their students by requiring that all students reach proficiency in reading, math, and science by 2014. In particular, districts and schools receiving funds under Title I of NCLBA are required to take certain actions when students do not make sufficient progress toward meeting state proficiency targets.² However, many Title I schools, which comprise over half of all public schools and serve about 26 million students, continue to struggle to raise student achievement. In the 2006-2007 school year, about one-fifth of the 54,000 Title I schools had failed to make adequate yearly progress (AYP) for at least 2 consecutive

¹Pub. L. No. 107-110.

²In this report, we refer to Title I, Part A of NCLBA as “Title I.” Other Parts of Title I (Parts B through I) generally are targeted at specific populations or purposes and are commonly referred to by their program names, such as Education of Migratory Children.

years, and about 4,500 of these schools had not made AYP for 4 or more years. Under NCLBA, when a Title I school does not make AYP for 4 years, the school enters corrective action, and the district must take a statutorily prescribed action to improve the school, such as replacing selected teaching staff. If the school fails to make AYP for 6 years, the district is required to restructure the school by changing how the school is governed.³ Such changes may include closing the school and re-opening it as a charter school or turning the operation of the school over to the state educational agency. As annual goals leading up to the 2014 deadline continue to increase, more schools are expected to enter corrective action and restructuring and will be required to take major action to improve.

However, little is known about what specific corrective actions or restructuring options schools are currently implementing nationwide, the extent to which these actions are associated with making AYP, and the support that schools in corrective action and restructuring have received from school districts and states as they attempt to improve student performance. In order to shed light on these issues and help the Congress prepare for reauthorization of the NCLBA, you asked GAO to answer the following questions: (1) What are the characteristics of Title I schools in corrective action and restructuring? (2) To what extent have schools in corrective action and restructuring implemented corrective actions or restructuring options? (3) What assistance have schools in corrective action and restructuring received from districts and states? and (4) How has the Department of Education (Education) supported states in their efforts to assist schools in corrective action and restructuring status?

To provide information on these topics, we collected data through multiple methods. We obtained data on which schools were in corrective action and restructuring for the 2005-2006 school year. States reported these data to Education through the Consolidated State Performance Report process, which collects annual information from states on ESEA programs. We matched data on these schools with additional data in Education's Common Core of Data (CCD), conducted descriptive analyses of selected characteristics, and compared them to all other Title I schools. We also administered two Web-based surveys sent to 470 principals in a nationwide sample of schools in corrective action and restructuring during

³Of the 4,509 schools that had not made AYP for 4 or more consecutive years, 2,330 were in corrective action; 937 were planning for restructuring; and 1,242 were in restructuring status.

the 2005-2006 school year. We administered the surveys between January and March 2007 and received a combined response rate of about 70 percent. Percentage estimates from the surveys have margins of error of plus or minus 8 percentage points using a 95 percent confidence interval, unless otherwise noted. While we did not fully validate specific information that school officials reported in our survey, we took several steps, including corroborating evidence of some schools' improvement status, to ensure that the information provided by school officials was sufficiently reliable for the purposes of this report. We conducted site visits to 5 states (California, Illinois, Maryland, New York, and Pennsylvania) and 10 school districts with schools in corrective action, restructuring, or both, as well as 20 schools in those districts. The states, districts, and schools selected for site visits not only provided variation across such characteristics as geographic location and district size, but also generally resembled all schools in corrective action and restructuring in terms of students' racial, ethnic, and economic characteristics. Together, schools in these 5 states accounted for over 59 percent of schools in corrective action and restructuring nationally in the 2005-2006 school year. We also interviewed state officials from several states (Idaho, South Dakota, Texas, and Virginia) that had few schools in correction action or restructuring to obtain information on how their state educational agencies are working with districts on school improvement issues. We reviewed relevant federal laws, regulations, and agency guidance and interviewed Education officials to obtain information about how they monitor and provide assistance to states and districts. We also interviewed officials in some of Education's comprehensive and regional assistance centers. We analyzed relevant Education documents and studies and reports issued by policy and research organizations on schools in corrective action and restructuring and interviewed staff in many of these organizations. See appendix I for detailed information on both surveys as well as our other data collection methods. We conducted our work from August 2006 through August 2007 in accordance with generally accepted government auditing standards.

Results in Brief

The 2,790 Title I schools nationwide in corrective action and restructuring status in the 2005-2006 school year—comprising about 5 percent of all Title I schools and serving over 2 million students—were more frequently located in urban school districts and a few states and served higher percentages of poor, minority, and middle-school students than other Title I schools. Nationwide, almost two-thirds of the 1,155 corrective action and 1,635 restructuring schools were in urban districts, compared to about one-quarter of other Title I schools. Five states—California, Illinois,

Michigan, New York, and Pennsylvania—collectively had over 60 percent of these schools, but less than 30 percent of all Title I schools. When compared to all other Title I schools, those in corrective action and restructuring served more than twice as many racial or ethnic minority students—96 percent compared to 37 percent—and a higher percentage of students who were economically disadvantaged—83 percent compared to 54 percent. More than twice as many of these schools served middle school students as compared to all other Title I schools. Nationwide, the number of schools in corrective action and restructuring increased substantially to 4,509 in the 2006-2007 school year from 2,790 in the previous year. As state proficiency targets continue to increase until they reach 100 percent by 2014, the number of schools in corrective action and restructuring may grow, because many schools now in early stages of improvement may continue to struggle to make AYP.

Though many schools had implemented a corrective action or restructuring option, some schools may not be meeting NCLBA requirements. Among schools in corrective action status, we estimate that 94 percent implemented at least one required corrective action and that about three-quarters used more than one corrective action. Hiring an outside expert and changing the internal structure of the school were the most frequently implemented actions, with each implemented by about 60 percent of schools. However, based on our survey, we estimate that 6 percent of schools did not take any of the required corrective actions. About a third continued corrective actions implemented during earlier years of school improvement after entering corrective action status. Education officials told us that if a school had previously implemented a corrective action, an additional action might not be required if the school provided evidence that the intervention is producing results that are likely to enable the school to exit improvement status. As of July 2007, Education had not developed guidance on when continuing prior actions without implementing a new one is acceptable. About 60 percent of schools in restructuring implemented a restructuring option as required by NCLBA, and the two most frequently selected options were “other” major restructuring, such as reconfiguring the grade levels served by the school, and replacing selected school staff. Yet many schools in restructuring may not have undertaken restructuring options as prescribed under NCLBA. States are required to report annually to Education on the measures taken to address the achievement problems of schools in improvement status, including schools in corrective action and restructuring. However, Education does not require states to report on the specific measures taken for each school, and therefore, the department has limited information on whether states have found that some districts may not be in compliance

with NCLBA requirements. A much higher percentage of schools that fully implemented activities, regardless of which activity they chose, made AYP compared with those that had not fully implemented activities. Nevertheless, we found that no one particular corrective action or restructuring option was associated with making AYP, nor was the number of activities undertaken associated with AYP.

We estimate that 42 percent of the schools in corrective action and restructuring did not receive all required types of assistance through their school district, although most received discretionary assistance from their state educational agency. Districts are required to ensure that several types of assistance are provided to all schools in improvement status, including those in corrective action and restructuring. This assistance ranges from analyzing student assessment data to revising school budgets so that resources are allocated to improvement efforts. NCLBA generally does not require states to provide specific kinds of assistance to schools in corrective action and restructuring. However states are required to develop a statewide system of support, including school support teams that are available to provide technical assistance to schools and districts. We estimate that most schools received some type of assistance from the state. For example, 60 percent of schools received assistance from a state support team and almost two-thirds received help from instructional experts or highly skilled educators. Additionally, almost half of the schools received state funds that were used for school improvement activities such as professional development.

Education provides technical assistance and research primarily through its Comprehensive Centers Program. The department replaced its former assistance centers and various education consortiums with 16 regional centers and 5 content centers to meet the requirements of the Education Sciences Reform Act of 2002. These centers are to help low performing schools and districts close achievement gaps and meet the goals of NCLBA. The centers provide assistance and research to states on developing approaches for improving schools. In addition, Education has expanded the material in its Web-based What Works Clearinghouse to address a greater number of topics and revised its district and school improvement guidance by adding more material on school restructuring. While the clearinghouse had little information on promising practices for schools in corrective action and restructuring, Education is developing an initiative targeted to principals, teachers, and other educators that is to develop practical steps to improve schools on the basis of scientifically based research identified by the clearinghouse and may have information on school restructuring by the end of 2007.

To enhance school efforts to increase student achievement, we recommend that Education provide guidance to districts on when schools may continue previously implemented corrective actions rather than taking new ones. We also recommend that Education obtain more specific information from states on the specific improvement activities implemented by each school in corrective action and restructuring as well as more specific information on compliance issues states identified as part of their monitoring activities. Finally, we recommend that the department take additional steps through its monitoring process to ascertain whether states are ensuring that districts provide the assistance required by NCLBA. Education agreed with our recommendations and stated it would explore options for providing more guidance, gathering additional information from states, and improving its monitoring activities.

Background

Under NCLBA, states are required to establish performance goals and hold their Title I schools accountable for students' performance by determining whether or not schools have made AYP. Schools that have not met their state's performance goals for 2 or more consecutive years are identified for improvement and must implement certain activities that are meant to improve student academic achievement. Districts and states play a role in this process by providing technical assistance to schools. In addition, states are responsible for monitoring district and school compliance with NCLBA. Education provides states and districts with guidance on school improvement and monitors states for compliance with NCLBA requirements.

States and Districts Are Held Accountable for the Performance of Their Schools and Must Take Action to Improve Student Achievement When Schools Do Not Make AYP for 2 or More Years

Prior to NCLBA, the Congress attempted to hold states accountable for the annual performance of their schools by requiring them to collect assessment data, develop criteria to determine whether schools and districts were performing satisfactorily, and conduct student assessments. The 1994 reauthorization of ESEA—Improving America's Schools Act (IASA)—required that schools be designated for improvement for failure to make AYP for 2 consecutive years and that districts take corrective action as a final intervention for schools that repeatedly missed AYP.⁴ However, under IASA states assessed AYP in different ways and used different measures to evaluate school performance. NCLBA added several

⁴Pub. L. No. 103-382.

new provisions to address these differences and to strengthen accountability. These provisions include:

- The requirement that states develop plans that include academic standards and establish performance goals for meeting AYP that would lead to 100 percent of their students being proficient in reading, mathematics, and science by 2014.⁵ To measure their progress, states were required to establish academic proficiency goals for making AYP and to administer an annual assessment to students in most grade levels.⁶ In addition, each school's assessment data must be disaggregated in order to compare the achievement levels of students within certain designated groups with the state's proficiency targets. These student groups include the economically disadvantaged, major racial and ethnic groups, students with disabilities, and those with limited English proficiency, and each of these groups generally must make AYP in order for the school to make AYP.
- A timeline for implementing specific interventions based on the number of years the school missed AYP.⁷ For a school that fails to meet AYP for 2 consecutive years, districts must offer students in these schools the opportunity to transfer to a higher-performing public school in the district, and after the third year, they must also offer supplemental education services (SES), such as tutoring. In addition, the school must also develop an improvement plan in consultation with the district, school staff, parents, and outside experts. These plans, which are subject to district approval, must incorporate strategies to address the specific academic issues that caused the school to be identified for improvement. Under NCLBA, if a school fails to make AYP for 4 consecutive years, it is required to implement one of the corrective actions identified in the legislation. In addition, a new intervention to change the governance of schools—school restructuring—was introduced for schools that miss AYP for 5 or more

⁵This requirement applies to all states and students in public schools regardless of whether the school receives Title I funding or not.

⁶Students in grades 3 to 8 must be annually assessed in reading and mathematics, while high school students are only required to be assessed once in these subjects. Assessments in science, which were first required under NCLBA in school year 2007-2008, are required at least once in grades 3 to 8, grades 6 to 9, and grades 10 to 12. 20 U.S.C. § 6311(b)(3)(C)(v) – (vii).

⁷The timelines and other requirements for these improvement strategies are outlined in 20 U.S.C. § 6316(b).

years. (See table 1.) Districts are responsible for selecting and implementing the corrective actions and restructuring options for these schools. Schools exit improvement status if they make AYP for 2 consecutive years.

Table 1: Timeline for Implementing Interventions for Schools That Do Not Make Adequate Yearly Progress

Adequate yearly progress	School status in the next year	NCLBA interventions for Title I schools
First year missed	Not Applicable	None
Second year missed	Needs Improvement (First Year of Improvement)	Required to offer public school choice ^a
Third year missed	Needs Improvement (Second Year of Improvement)	Required to offer public school choice and SES
Fourth year missed	Corrective Action (Third Year of Improvement)	Implement certain corrective actions and offer public school choice and SES
Fifth year missed	Planning for Restructuring (Fourth Year of Improvement)	Plan for a change in governance and offer public school choice and SES ^b
Sixth year missed	Implementation of Restructuring (Fifth Year of Improvement)	Implement a change in governance and offer public school choice and SES

Source: GAO analysis of NCLBA and Education's regulations.

^aAt this stage, the school must also develop the school improvement plan.

^bWhile NCLBA does not require that corrective actions must be continued after a school enters restructuring, Education officials noted that in practice, many schools continue corrective actions after entering restructuring status.

Schools in corrective action must implement at least one of six activities such as replacing selected school staff or implementing a new curriculum.⁸ Schools that do not make AYP after 5 years must plan for restructuring, which means that the district must decide how to change the school's governance. Restructuring, the most severe of the NCLBA interventions, requires that the school implement a major change to how the school is operated, such as reorganizing into a public charter school or contracting with an outside organization such as a private management company to operate the school.⁹ If the school does not make AYP during the planning

⁸20 U.S.C. § 6316(b)(7).

⁹20 U.S.C. § 6316(b)(8).

phase, the school enters restructuring. The corrective action and restructuring activities allowed under NCLBA are shown below in table 2. NCLBA does not address actions that districts must take after implementing restructuring and the school continues to fail to make AYP. Education officials said that they have encouraged states and districts to continue to try different interventions with these schools.

Table 2: Allowable Activities for Schools in Corrective Action and Restructuring

Corrective actions	Restructuring options
<p>The district must implement at least one of the following actions:</p> <ul style="list-style-type: none"> • Replace the school staff who are relevant to the failure to make AYP • Institute and fully implement a new curriculum • Significantly decrease management authority at the school level • Appoint an outside expert to advise the school on its progress toward making adequate yearly progress • Extend the school year or the school day • Restructure the internal organizational structure of the school 	<p>The district must implement at least one of the following options:</p> <ul style="list-style-type: none"> • Reopen the school as a charter school • Replace all or most of the school staff (which may include the principal) who are relevant to the failure to make AYP • Contract with another organization or company to operate the school • Turn the operation of the school over to the state • Implement any other major restructuring of the school's governance, such as: <ul style="list-style-type: none"> • Expand or narrow the grades served; • Close the school and re-open it as a theme school (for example, a math and science academy)

Source: GAO analysis of NCLBA (20 U.S.C. § 6316(b)(7) and (8)) and Education's guidance.

Both Districts and States Provide Technical Assistance to Schools in Improvement

The school district bears the primary responsibility for ensuring that its schools in improvement, including those in corrective action and restructuring, receive technical assistance, although the state also plays a role in providing assistance. The purpose of the district's assistance is to strengthen and improve the school's instructional program by helping the school address the issues that caused it to make inadequate progress in student achievement.¹⁰ Specifically, the district must ensure that each school identified for improvement receives assistance based on scientifically based research in three areas: analysis of student assessment

¹⁰Districts are required to ensure that their schools receive this technical assistance, but they do not have to provide it directly themselves. Instead, they may elect to provide it through other entities such as an institution of higher education, private organizations, educational service agencies, or other entities with experience in helping schools improve academic achievement. 20 U.S.C. § 6316(b)(4)(B)(iv).

data, identifying and implementing instructional strategies, and analysis of the school budget, as shown in table 3 below.¹¹

Table 3: NCLBA Technical Assistance Districts Are Required to Ensure for Schools Identified for Improvement, Including Those in Corrective Action and Restructuring

Data analysis

The district must ensure that school staff receive assistance in analyzing student assessment data to identify and develop solutions in areas such as

- Instructional deficiencies
- Parental involvement and professional development requirements

Identification and implementation of strategies

The district must ensure that the school receives help to identify and implement

- Instructional strategies and methods that are grounded in scientifically based research and address specific issues that cause the school to be identified for improvement
- Professional development relevant to implementation of such strategies and methods

Budget analysis

The district must ensure that the school is provided with

- Assistance in analyzing and revising its budget to fund activities most likely to increase student achievement

Source: GAO analysis of NCLBA.

The state educational agencies are also responsible for making several forms of technical assistance available to schools in improvement and overseeing the improvement activities of districts. States generally are required to reserve and allocate 4 percent of the state's total Title I allocation for school improvement activities, with 95 percent of these funds going directly to the districts. States are to prioritize their assistance to districts that, among other things, serve the lowest achieving schools, such as those in corrective action and restructuring. They also are required to develop and sustain a statewide system of support that provides technical assistance to schools, with a priority given to those in improvement status. In addition, in developing the statewide system of support, the state agency must:

- Establish school support teams to work in schools throughout the state that are identified for improvement. The purpose of these teams is to assist schools to strengthen their instructional programs and must include individuals who are knowledgeable about scientifically based

¹¹20 U.S.C. § 6316(b)(4) and 34 C.F.R. § 200.40.

research and practice and its potential for improving teaching and learning.

- Designate and use distinguished teachers and principals who are chosen from Title I schools and have been especially successful in improving academic achievement.
- Devise additional approaches to improve student performance, for example, by drawing on the expertise of other entities, such as institutions of higher education, educational service agencies, or private providers of scientifically based technical assistance.

Education Provides Assistance to States and Districts and Monitors for Compliance

Education provides assistance to states in implementing NCLBA and monitors states for compliance. Specifically, Education provides assistance to states and districts in several ways such as issuing regulations, providing guidance and policy letters, and through its comprehensive centers. For example, the department published nonregulatory guidance that was specific to schools in improvement and provided information on the actions that districts and states must take to reform their schools in compliance with NCLBA.¹² To help build the capacity of states to meet NCLBA goals, Education awarded almost \$57 million in fiscal year 2006 to the 21 comprehensive centers. These include 16 regional centers established to provide technical assistance to states within defined geographic areas. In addition, Education established five content centers that work closely with the regional centers to provide technical assistance to states on school improvement. One content center focuses on school improvement issues.

Education monitors each state agency to determine, among other issues, whether the state is ensuring that districts are implementing NCLBA requirements for school improvement. Education, the state agency, and districts all play a role in ensuring that schools are meeting NCLBA requirements. Their monitoring responsibilities are presented in table 4.

¹²See *LEA and School Improvement: Non-Regulatory Guidance* (Department of Education, Washington, D.C.: July 21, 2006).

Table 4: Education, State, and District Responsibilities for Monitoring States, Districts, and Schools Identified for Improvement

Stakeholder	Roles and responsibilities
Education	Monitor states to assess the extent to which states provide leadership and guidance for districts and schools in implementing policies and procedures that comply with NCLBA
State educational agency	Monitor districts to ensure they are <ul style="list-style-type: none"> • Meeting NCLBA requirements for such things as school choice, providing SES, and providing technical assistance to schools identified for improvement; • Providing guidance to their Title I schools to ensure they are complying with NCLBA program requirements; and • Ensuring that schools identified for improvement, corrective action, or restructuring implement required activities
School district	Monitor Title I schools identified for improvement for developing the school improvement plan and implementation of school improvement activities, including parental involvement activities

Source: GAO analysis of NCLBA and Education’s monitoring plan for Title I programs.

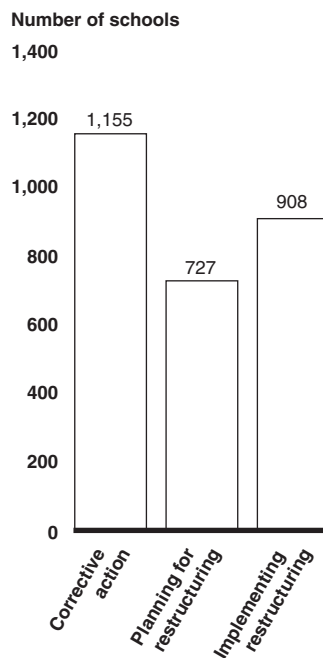
Education monitors states in two ways: (1) routinely gathers and analyzes data collected from Web-based searches and documents, such as Consolidated State Performance Reports,¹³ and (2) on-site visits at least once every 3 years to monitor state compliance with Title I. During these site visits, states are monitored to ensure that they are complying with Title I program requirements, which includes providing the necessary guidance and support to schools that are in improvement, including those in corrective action and restructuring. In addition, according to Education’s monitoring guidelines, Education officials visit selected districts in each state and ask for evidence on how schools are implementing required actions and meeting timeframes. Once the review is complete, Education issues a report to the state containing findings, recommendations, and required actions needed to address identified problems. A state is generally given 30 business days to respond to the findings and required actions and also to provide a timeline for addressing each issue. A state with significant findings may have conditions attached to its Title I Grant and if it fails to adequately address the identified deficiencies, the Secretary generally may withhold the state’s Title I funds that are used for state administration until all requirements have been satisfied.

¹³State may apply and report annually on multiple ESEA programs through a single consolidated application and report. These annual reports include information on numerous ESEA programs.

Schools in Corrective Action and Restructuring Were More Often Located in Urban School Districts and Served Higher Percentages of Minority, Poor, and Middle-School Students Than Other Title I Schools

Schools in corrective action and restructuring status in the 2005-2006 school year were more frequently located in urban school districts and a few states and served higher percentages of minority, poor, and middle-school students than other Title I schools.¹⁴ In the 2005-2006 school year, 2,790 Title I schools were in corrective action, planning for restructuring, or implementing restructuring (see fig. 1). These schools comprised about 5 percent of all Title I schools and served over 2 million students. Data for the 2006-2007 school year show that the numbers of schools in corrective action and restructuring are growing, a trend that is likely to continue.

Figure 1: Number of Title I Schools Identified for Corrective Action, Planning for Restructuring, and Implementing Restructuring in 2005-2006



Source: GAO analysis of Education data.

¹⁴The number of schools in corrective action, planning for restructuring or implementing restructuring are from the 2005-2006 school year. Their characteristics and comparisons to all other Title I schools are based on data from the 2004-2005 school year, the latest data available at the time we began our analyses. The Common Core of Data (CCD) refers to schools as Title I eligible. For the purposes of our analysis, we refer to these school as Title I schools.

Schools in Corrective Action and Restructuring Were Concentrated in Urban Areas and a Few States

Schools in corrective action and restructuring were predominantly located in urban areas, especially compared to all other Title I schools, as shown in table 5.

Table 5: Percentage of Schools in Corrective Action and Restructuring and All Other Title I Schools in 2005-2006, by Locale

Locale	Schools in corrective action and restructuring	All other Title I schools
Urban	63	27
Suburban	22	26
Town/Rural	15	44

Source: GAO analysis of data provided by Education.

Note: Locale data for 3 percent of all other Title I schools were missing.

Examples of urban areas with relatively higher numbers of schools in corrective action and restructuring include Chicago, Detroit, Los Angeles, New York, and Philadelphia. Nationwide, school districts in these 5 cities alone contained over 25 percent of all schools in corrective action and restructuring, as shown in Table 6. By comparison, these 5 districts contained less than 4 percent of all other Title I schools.

Table 6: Percentage of Schools Nationwide in Corrective Action and Restructuring in the Top 5 School Districts in School Year 2005-2006

School district	Schools in corrective action and restructuring
City of Chicago	10
New York City	7
Los Angeles Unified	3
Philadelphia City	3
Detroit City	2

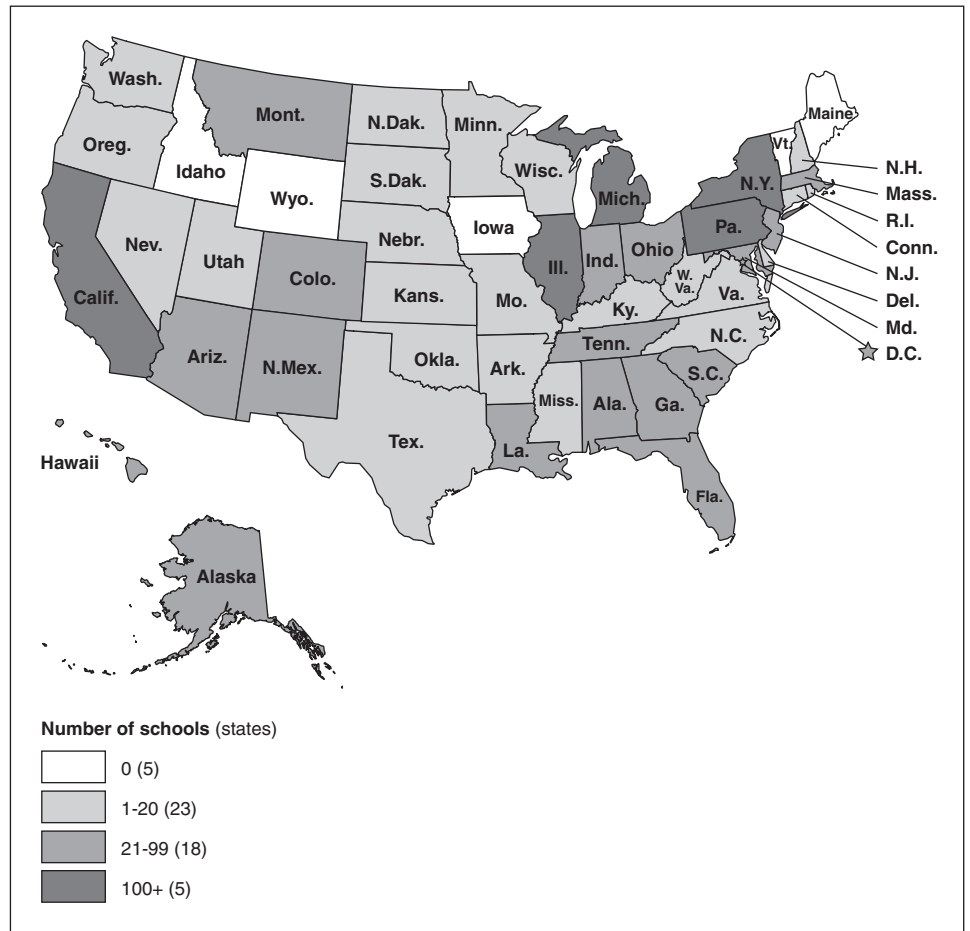
Source: GAO analysis of data provided by Education.

Note: Three other school districts (local educational agencies) each had 2 percent of the total of schools in corrective action and restructuring: Hawaii Department of Education (56 schools), the District of Columbia Public Schools (45 schools), and Baltimore City Public Schools (42 schools). The Hawaii Department of Education and the District of Columbia Public Schools each serves simultaneously as a state educational agency and a local educational agency (school district). New York City reported its number of schools by regions within the school district. For our report, we summed across regions within New York City to arrive at one number for the district as a whole.

Consequently, schools in corrective action and restructuring were concentrated in a few states. Five states—Illinois, New York, California, Pennsylvania and Michigan—collectively had over 60 percent of these

schools, but less than 30 percent of all Title I schools nationwide. In contrast, a majority of states had 20 or fewer schools in corrective action and restructuring, as shown in figure 2.

Figure 2: Number of Schools in Corrective Action and Restructuring in School Year 2005-2006, by State



Source: GAO analysis of Education data; (Map), Map Resources.

In general, states with large numbers of schools identified for improvement when NCLBA was passed had more schools in corrective action and restructuring in the 2005-2006 school year than those with few schools in improvement in 2001.¹⁵ Prior to NCLBA, states had identified schools for improvement, and when NCLBA was passed in the 2001-2002 school year, it generally required states to maintain the prior improvement status of schools.¹⁶ Consequently, many schools that were in earlier stages of improvement in school year 2001-2002 entered corrective action and restructuring in subsequent years.

Schools in Corrective Action and Restructuring Served a Higher Percentage of Minority, Economically Disadvantaged, and Middle School Students, Compared to All Other Title I Schools

Schools in corrective action and restructuring also had a much higher percentage of racial or ethnic minority students compared to all other Title I schools (96 percent compared to 37 percent) and also enrolled a higher percentage of economically disadvantaged students (83 percent compared to 54 percent).¹⁷ These differences varied substantially when the location of the school is accounted for, as seen in table 7.

¹⁵We also analyzed these data taking into account the number of schools as a percentage of all Title I schools by state. In general, states with a higher percentage of Title I schools in improvement when NCLBA was passed also had a higher percentage in schools in corrective action and restructuring in 2005-2006.

¹⁶20 U.S.C. § 6316(f).

¹⁷For this analysis, we compared the percentage of students who are members of racial or ethnic minority groups or who qualified for free- or reduced priced meals in the median schools when all schools were ranked by the percent of those characteristics in the schools.

Table 7: Percentage of Students with Selected Characteristics, Comparing Schools in Corrective Action and Restructuring with All Other Title I Schools, by Locale

Locale	Schools in corrective action and restructuring	All other Title I schools
Minority status		
Urban	98	84
Suburban	93	34
Rural/Town	93	11
Poverty status		
Urban	83	70
Suburban	81	45
Rural/Town	83	49

Source: GAO analysis of data provided by Education.

Note: The table shows the percentage of students who are members of racial or ethnic minority groups or who qualified for free-or reduced-priced meals in the median schools (by locale) when all schools were ranked by the percent of those characteristics in the schools.

Schools in corrective action and restructuring varied in terms of the grade level of students that they served. Compared with all other Title I schools, middle schools were considerably over-represented among schools in corrective action and restructuring while primary schools were underrepresented, as seen in table 8.¹⁸

¹⁸Our finding on middle schools is similar to findings in other reports. See U.S. Department of Education, *National Assessment of Title I Interim Report, Vol 1: Implementation*, Institute of Education Sciences (Washington, D.C.: February 2006); and Center on Education Policy, *NCLB: Middle Schools are Increasingly Targeted for Improvement* (Washington, D.C: 2006). We found no notable difference between the percentage of middle schools in corrective action and restructuring and the percentage of all other Title I schools based on whether they were located in an urban, suburban, or rural area.

Table 8: Percentage of Schools in Corrective Action and Restructuring Compared to All Other Title I Schools, by Grade Level

Grade level	Schools in corrective action and restructuring	All other Title I schools
Primary	52	70
Middle	32	15
High	12	10
Other	4	5

Source: GAO analysis of data provided by Education.

Note: For the purposes of our analysis, we used the definitions of primary, middle, and high schools provided in the CCD, as described in appendix I of this report.

Several factors might explain why middle schools are over-represented. Evidence from the National Assessment of Educational Progress—especially for many of the urban school districts with numerous schools in corrective action or restructuring—shows that the percentage of students who score at a proficient level or above in math is generally lower in middle schools than in elementary schools.¹⁹ Other factors may also include being less qualified than their peers in elementary or middle schools, teachers in middle schools, and social and emotional challenges associated with students as they make the transition into middle schools.²⁰ Yet another reason may be that because of NCLBA provisions about the minimum number of students in a school that would comprise a designated student subgroup, middle schools typically have to make AYP for more student subgroups than elementary schools.²¹

¹⁹Results for reading are mixed, with proficiency rates higher for some district's or groups of middle school students than elementary school students, but lower for others. See U.S. Department of Education, *The Nation's Report Card: Reading 2005*. NCES 2006-451 (Washington, D.C.: October, 2005). See *The Nation's Report Card: Mathematics 2005*. NCES 2006-453 (Washington, D.C.: October, 2005); *The Nation's Report Card: Trial Urban District Assessment Mathematics, 2005*, NCES 2006-457r (Washington, D.C.: February 2006); *The Nation's Report Card: Trial Urban District Assessment Reading, 2005*. NCES 2006-455r (Washington, D.C.: February 2006).

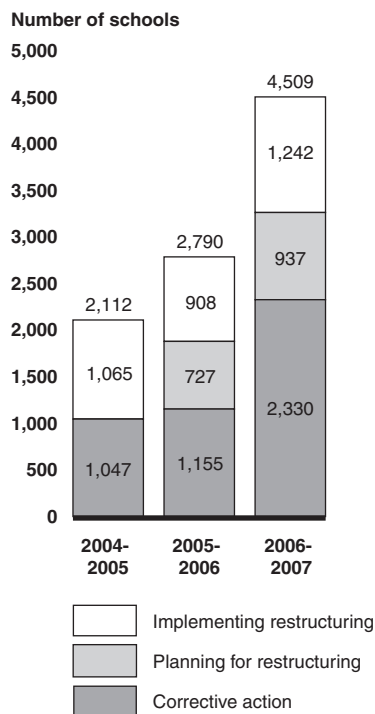
²⁰RAND, *Focus on the Wonder Years: Challenges Facing the American Middle School* (Santa Monica, Calif.: 2004).

²¹Center on Education Policy, *NCLB: Middle Schools Are Increasingly Targeted for Improvement*, NCLB Policy Brief 2 (Washington, D.C.: 2005).

The Number of Schools in Corrective Action and Restructuring Has Increased Considerably from Last Year and May Continue to Do So

Data for the 2006-2007 school year showed that the number of schools in corrective action and restructuring has increased. In 2006-2007, there were 4,509 schools in corrective action and restructuring compared to 2,790 the year before, an increase of over 60 percent, and more than twice as many schools compared to just 2 years earlier. (See fig. 3.)

Figure 3: Number of Schools in Corrective Action and Restructuring for the 3 Most Recent School Years



Source: GAO analysis of Education data.

Note: For the 2004-2005 school year, we used data from the *National Assessment of Title I: Interim Report* which had only one category for schools in restructuring and did not distinguish between schools planning for restructuring and those implementing restructuring. Also, this report, which was not updated, included data from some states that had not completed decisions for schools appealing their improvement status, resulting in fewer schools ultimately identified than was reported.

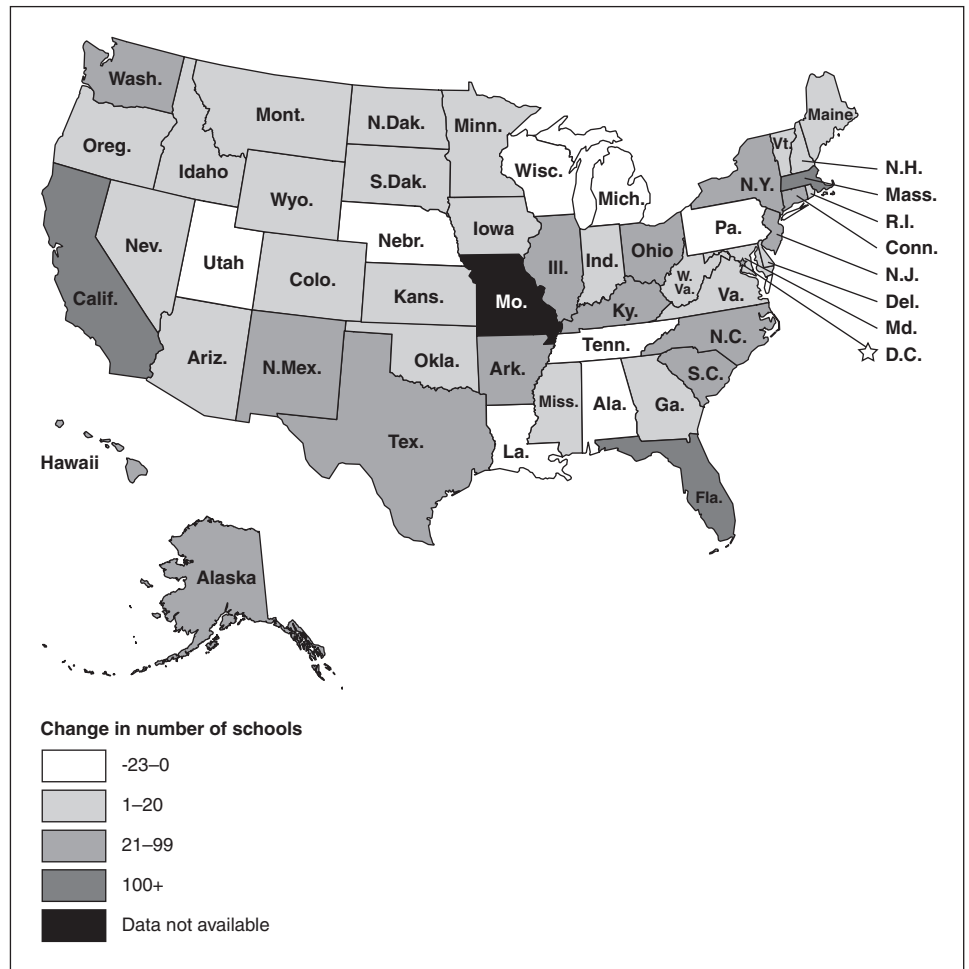
Additionally, 41 states had more schools in corrective action and restructuring whereas only 8 states had fewer.²² (See fig. 4 and see app. II

²²The number of schools in corrective action and restructuring for one state did not change between school years 2005-2006 and 2006-2007, and another state had yet to finalize its data for 2006-2007.

for a comprehensive list of the number of schools in corrective action and restructuring in each state.) Most notably, in 2006-2007, the state of Florida had 574 schools in those categories compared to only 32 such schools in 2005-2006. According to a Florida state official, this increase is attributable to the fact that many schools have been struggling to meet the increasing proficiency targets. Other states with large increases include California (increase of 376 schools) and Massachusetts (increase of 118 schools). A few states, such as Michigan, had fewer schools in corrective action and restructuring in 2006-2007 compared to the prior year. In Michigan's case, it is not clear whether the decrease was related to state or district reform efforts, changes in criteria making it easier for schools to make AYP, or some combination of these factors.²³

²³See Center on Education Policy, *What Now? Lessons from Michigan about Restructuring Schools and Next Steps Under NCLB* (Washington, D.C.: 2007).

Figure 4: Change in the Number of Schools in Corrective Action and Restructuring from 2005-2006 to 2006-2007, by State



Source: GAO analysis of Education data, (Map) Map Resources.

Note: Missouri did not submit to Education its final list of schools identified for improvement in the 2006-2007 school year.

The general trend toward higher numbers of schools in corrective action and restructuring may continue. As of the 2006-2007 school year, more schools were identified for improvement than at any time since such data were tracked under IASA. As proficiency targets continue to increase up to 100 percent by 2014, many schools identified for improvement may not make AYP. Consequently, if these schools cannot meet the increasing proficiency targets, they will enter corrective action and ultimately restructuring.

Most Schools Used a Corrective Action or Restructuring Option, but Some May Not be Meeting NCLBA Requirements

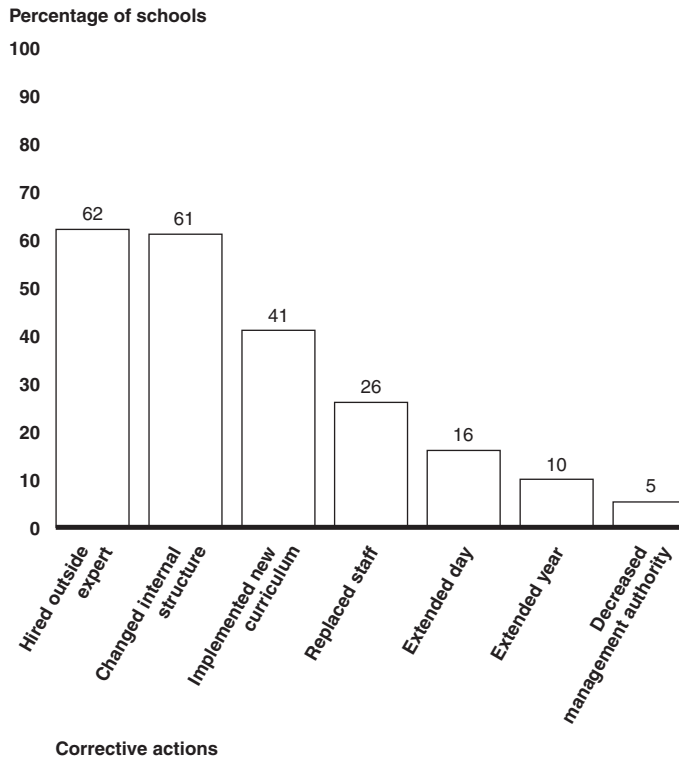
Our survey results indicated that a majority of schools in corrective action and restructuring implemented required activities; however, in some cases schools may not be in compliance with NCLBA requirements.²⁴ Although many schools in corrective action implemented multiple corrective actions, some did not take any corrective action. A majority of restructuring schools implemented a required restructuring option, but based on our survey results, about 40 percent of schools did not take any of the 5 restructuring options required by NCLBA, one of which is a broad category referred to as “other” major restructuring. Although there was no relationship between any of the specific activities and whether a school made AYP, a higher percentage of schools that fully implemented improvement activities made AYP compared with those that had not fully implemented activities.

Among Schools in Corrective Action, Almost All Took at Least One Corrective Action, but Some May Not Have Taken an Action As Required by NCLBA

Among schools in corrective action status, we estimate that 94 percent implemented at least one corrective action from those specifically identified by NCLBA, and about three-quarters had used more than one corrective action. Hiring an outside expert and changing the internal structure of the school were the most frequent actions, with each implemented by about 60 percent of schools. Outside experts are used to advise the school on its progress toward making adequate yearly progress. Among schools that changed their internal structures, about 85 percent increased small group work and about 75 percent reorganized the school schedule to increase opportunities for professional development. Many schools also reduced class size, created small learning communities, and implemented team teaching as part of the changes to the organizational structure. In addition to hiring outside experts and changing internal structure, about 40 percent of schools changed the curriculum. A smaller percentage of schools implemented certain forms of corrective actions such as extending the school year or day or decreasing management authority at the school level. Some officials explained that extending the school year or day would be costly to the district because teacher salaries may have to increase to compensate for the additional instructional time. For the majority of schools, district officials played a significant role in determining the action taken. Figure 5 shows the allowed corrective actions and the percentage of schools implementing each action.

²⁴All survey findings are based on what school officials reported through GAO’s Web-based or paper survey. We did not verify whether schools had implemented the activities they reported taking.

Figure 5: Corrective Actions Allowed under NCLBA and Estimated Percentage of Schools That Implemented Each Action in 2005-2006



Source: GAO survey.

Note: These sum to more than 100 percent because some schools implemented more than one action.

Based on our survey, we estimate that 6 percent of schools in corrective action status did not take corrective actions. For example, in one school we visited, the principal told us that the school had not implemented any changes during its year in corrective action. He told us that the district provided no input on the required actions and that the state educational agency approved the school improvement plan without comment.

About a third of schools that went into corrective action in 2005-2006 did not take a new corrective action in that year. These schools took corrective action in earlier years of improvement and did not implement any further corrective actions after entering corrective action status. For example, some schools indicated that the school used an outside expert or implemented a new curriculum in previous school years and had not implemented any additional corrective actions the year in which the

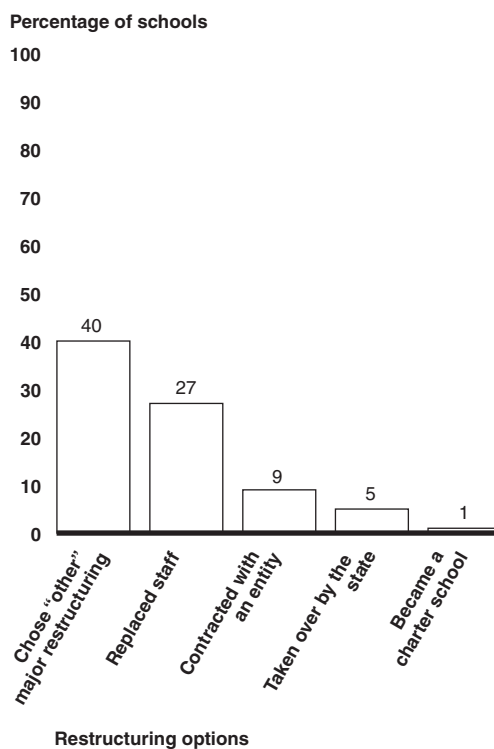
school entered corrective action status. Education officials told us that if a school implemented a corrective action in earlier stages of improvement (year 1 or 2 of improvement), an additional corrective action might not be required. They explained that whether a district must take additional actions depends in part on whether the school is showing improvement in student achievement. If the school showed evidence that the intervention is producing results that are likely to enable the school to exit improvement status, an additional corrective action might not be necessary. On the other hand, Education officials noted that if the data indicates that the previous corrective actions have not addressed the school's achievement problems they would expect the district to take additional corrective action. While it may be appropriate in some cases for schools to continue implementing the same actions, Education officials acknowledged that they have not provided written guidance on when continuing prior actions without implementing a new one would be acceptable.

Department officials told us that while they had conducted Title I monitoring in every state, they had not found compliance issues specifically related to corrective action from their monitoring visits. States are required to conduct annual reviews of district progress in part to ensure that districts are carrying out their responsibilities, one of which is taking at least one corrective action when necessary. However, states generally do not report to Education district noncompliance, such as failure to take corrective actions as required. Under NCLBA, states are required to annually submit to Education and make widely available the measures taken to address the achievement problems of schools in improvement status, including schools in corrective action. However, Education does not require states to report on the measures taken for each school. Instead, Education requires states to provide a brief summary of the measures taken across the state. Consequently, Education lacks information on which action was taken by each school, whether schools are taking actions at all, and whether or not states have taken any actions against schools or districts for failure to comply with NCLBA.

Among Schools in Restructuring, Almost Two-Thirds Implemented a Restructuring Option; However, Many Schools May Not Be in Compliance with NCLBA Requirements

We estimate that a majority of schools in restructuring had implemented at least one of the five restructuring options allowed by NCLBA.²⁵ According to NCLBA, each of these options is to result in a major change to the school’s governance. As figure 6 shows, about 40 percent of the schools implemented the “other” major restructuring of the school’s governance, which can include such actions as expanding or narrowing the grades served or creating smaller learning communities within the school.²⁶ We estimate that 27 percent of schools replaced all or most of the staff related to the school’s performance issues.

Figure 6: Restructuring Options Allowed under NCLBA and Estimated Percentage of Schools That Implemented Each Option



Source: GAO survey.

²⁵The information provided in this section pertains only to those schools that were in the implementation stage of restructuring in 2005-2006 school year. This section does not pertain to schools that were planning for restructuring.

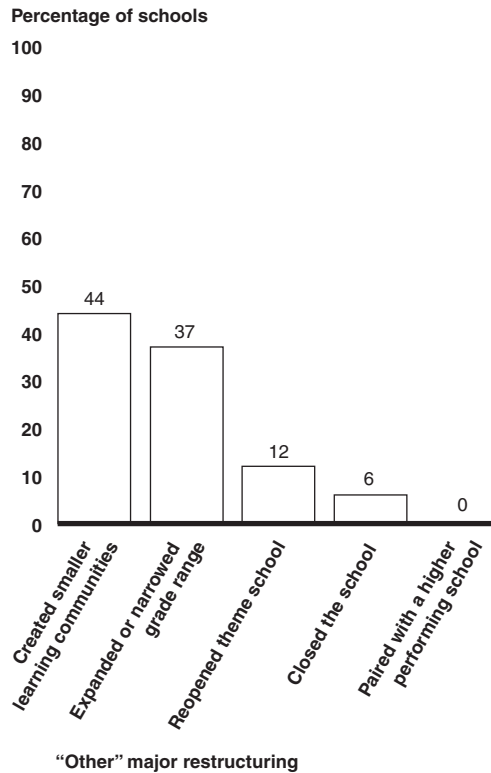
²⁶Another study found similar results for schools implementing restructuring in the state of California. See Center on Education Policy, *Beyond the Mountains: An Early Look at Restructuring in California* (Washington, D.C.: 2007).

Of the 40 percent of schools that selected “other” major restructuring of the school’s governance, 44 percent created smaller learning communities—an approach taken by some of the schools we visited.²⁷ For example, one middle school we visited created “academies” within the school. Each academy had its own theme, and students stay within the academy as they are promoted from grade to grade. Another 37 percent of schools that chose the “other” option narrowed or expanded the range of grades served within the school, for example, changing a kindergarten-through-grade-five elementary school to a kindergarten-through-grade-eight school. In one district we visited, officials reported that a kindergarten-through-grade-eight model creates a more positive learning environment than middle schools do as it creates a sense of family and relationships in schools. Figure 7 shows the various types of restructuring activities taken by schools implementing “other” major restructuring.²⁸

²⁷Margins of error for estimates pertaining to schools that implemented “other” major restructuring do not exceed 15 percent.

²⁸These categories reflect the examples of “other” major restructuring provided in Education’s 2006 guidance.

Figure 7: Among Schools Implementing “Other” Major Restructuring, Estimated Percentage of Schools Implementing Various Activities



Source: GAO survey.

In addition to the “other” major restructuring option, in an estimated 27 percent of restructuring schools, all or most of the staff (primarily teachers and principals) who were relevant to the failure to make AYP were replaced. The schools we visited that replaced staff varied in terms of whether teachers, principals, or both were replaced. Our survey indicated that for many of these schools, it was difficult or very difficult to recruit new teachers as replacements.

Very few schools in restructuring had contracted with an entity, such as a private management organization, become a charter school, or been taken over by the state. Some states may not have authorized all restructuring options under state law or policy, which may explain why fewer schools have taken these options. For example, according to a recent report, while some states have policies that permit districts to turn schools over to

private management or to reopen schools as charter schools, others do not.²⁹ In three of the five states we visited, state officials reported that their state educational agencies currently do not take over schools.³⁰ In one of these states, turning over school management to the state agency is permissible under state policy, but officials told us that the state does not have the capacity or expertise to do so.³¹ The amount of time it takes to plan for such a change may also be a factor in why these options are not often selected. For example, a district official reported that the district did not have sufficient time during the restructuring planning process to seriously consider reopening as a charter school, contracting with a private management company, or turning the operation of the school over to the state. In about 70 percent of schools, the district played a significant role in determining the restructuring option taken.

Although a majority of schools implemented a restructuring option, about 40 percent of the schools that were in restructuring did not take any of the 5 restructuring options prescribed under NCLBA, according to our survey results. Several principals of schools that had not restructured did not know why an option was not taken. In other cases, principals believed that the school board or district had decided not to restructure. In addition, one of the surveyed schools and some school and district officials we visited did not believe restructuring was necessary when student achievement was improving. For example, officials at one of the schools we visited that was planning for restructuring indicated that the district and school administration had determined that no changes were needed because they were confident that the actions already taken were helping students.

Nonetheless, about half of the schools that did not take one of the five restructuring options engaged in a variety of school improvement efforts. Some of these efforts may fall under the “other” major restructuring option, while others do not appear to be consistent with NCLBA

²⁹*Education Week* (Editorial Projects in Education), “Quality Counts: 2007. From Cradle to Career: Connecting American Education from Birth to Adulthood,” (Bethesda, Md.: January 2007).

³⁰According to the same report, many states currently authorize turning over school management to the state educational agency through state policy. (*Education Week* (Editorial Projects in Education), (January 2007).

³¹Another state educational agency we visited attempted to take over schools, but state officials told us that the state legislature prevented it from doing so.

requirements for restructuring. For example, one school implemented a new curriculum as a restructuring option, while at another school extra funding was used for small group instruction and after-school programs, both of which more closely resemble corrective action under NCLBA. In addition, in two districts we visited, officials allowed schools that were improving to continue efforts started under prior stages of improvement. However, we could not determine based on the information reported by survey respondents whether these activities would be considered restructuring under NCLBA. Further, several Education officials we spoke with could not determine whether or not the actions schools reported taking were in compliance without more information from the schools, such as other on-going districts efforts.

Similar to our finding that many schools may not be implementing a restructuring option, Education's 2006 interim report on Title I stated that very few schools in restructuring status implemented a restructuring option prescribed by NCLBA, though many implemented actions NCLBA specifies for the corrective action stage of school improvement.³² Despite these findings, department officials told us that they did not have any monitoring findings related to restructuring requirements, nor did they know whether any states had found districts that had not implemented restructuring requirements, although they did find deficiencies in some districts' review of school improvement plans.

Education's monitoring tools and reporting requirements do not fully address issues of compliance. While Education's state monitoring tool includes questions about how states monitor the implementation of school improvement plans, Education officials acknowledged that the department may be able to strengthen its monitoring tool to determine whether state oversight of districts is adequate to ensure compliance. Also, since states are not required to report district noncompliance to Education and Education does not require states to report on the specific corrective actions and restructuring options taken to address the achievement problems of each school, federal officials have limited information on areas in which there are compliance issues as well as the extent to which districts are complying.

³²Department of Education, *National Assessment of Title I Interim Report, Vol. 1: Implementation*, Institute of Education Sciences (Washington, D.C.: February 2006). Education explained its findings in part by noting that the survey did not specify whether schools were planning restructuring or implementing restructuring.

A Higher Percent of Schools That Fully Implemented Improvement Activities Made AYP

We estimate that over a third of schools that fully implemented a corrective action or restructuring option made AYP, as opposed to 16 percent of schools that had mostly or partially implemented improvement activities.³³ Several officials noted, and research shows, that school improvement efforts take more than a year to affect student achievement, so it is possible that these activities will help these schools make AYP over the next several years. Many district and school officials we interviewed told us that implementing a new curriculum takes time and that other improvement efforts can take several years to fully implement and to see results. Other factors also can affect school improvement efforts. For example, among the schools that made AYP, 76 percent of principals believed teacher quality helped or greatly helped school improvement activities in their school, opposed to only 53 percent among schools that had not made AYP.³⁴ In addition to teacher quality, around 80 percent of school officials believed that instructional support and resources, such as teacher aides and computers, helped or greatly helped their school improvement efforts. Schools lacking such support may find implementation of corrective action and restructuring more challenging.

Based on our survey results, none of the specific corrective actions or restructuring options was associated with making AYP, nor was making AYP associated with the number of activities undertaken, and these findings are consistent with recent research on school improvement.³⁵ Many school officials believed that other factors affected student achievement and therefore, the schools' ability to make AYP. About 80 percent of school principals believed that community poverty impeded student achievement, while two-thirds believed community violence

³³Our findings throughout this section are based on analyses that did not allow us to determine whether the type of school improvement activity, level of implementation, or number of activities taken caused schools to make AYP. However, we did test for whether these factors were related to making AYP, and found no statistically significant relationships. The RAND Corporation has conducted a study that emphasizes the importance of implementation of school reform efforts. See RAND, *Evaluating Comprehensive School Reform Models at Scale: Focus on Implementation* (2006), Arlington, VA.

³⁴Among schools that made AYP, the 95 percent confidence interval for this estimate ranges from 65 percent to 87 percent of principals who believed teacher quality helped or greatly helped school improvement activities in their school.

³⁵Mintrop, H. and Trujillo, T., "Corrective Action in Low-Performing Schools: Lessons for NCLB Implementation from First-Generation Accountability Systems," *Education Policy Analysis Archives*, Vol. 13, Issue 48 (December 2005) and Ronald C. Brady, *Can Failing Schools be Fixed?* (Thomas B. Fordham Foundation, Washington, D.C.: January 2003).

impeded achievement. We found similar views during our site visits.³⁶ For example, at two schools we visited, officials noted that the presence of gangs in the neighborhood affected student achievement, and teachers at one school commented that it was unsafe for students to visit the community library after dark. Several school and district officials observed that poverty affected students' academic efforts. School officials noted that many poor students cannot stay late at school because they have family obligations, such as taking care of younger children. In addition, about two-thirds of school principals believed that student mobility (moving from one school to another) impeded student achievement, and several officials said that districtwide or statewide curricula had been implemented, in part, to address widespread student mobility by establishing a consistent instructional approach across schools. Moreover, we estimate that nearly half of school officials believed that low student attendance impeded student achievement at their school. This finding was more prevalent among schools that had not made AYP compared to schools that had made AYP. Finally, several activities were undertaken by very few schools, such as state takeover or extending the school year, so these activities' association with AYP could not be accurately assessed in this study.

Many Schools in Corrective Action and Restructuring Did Not Receive All Required Assistance through Their School Districts; However, Most Received Assistance from Their State

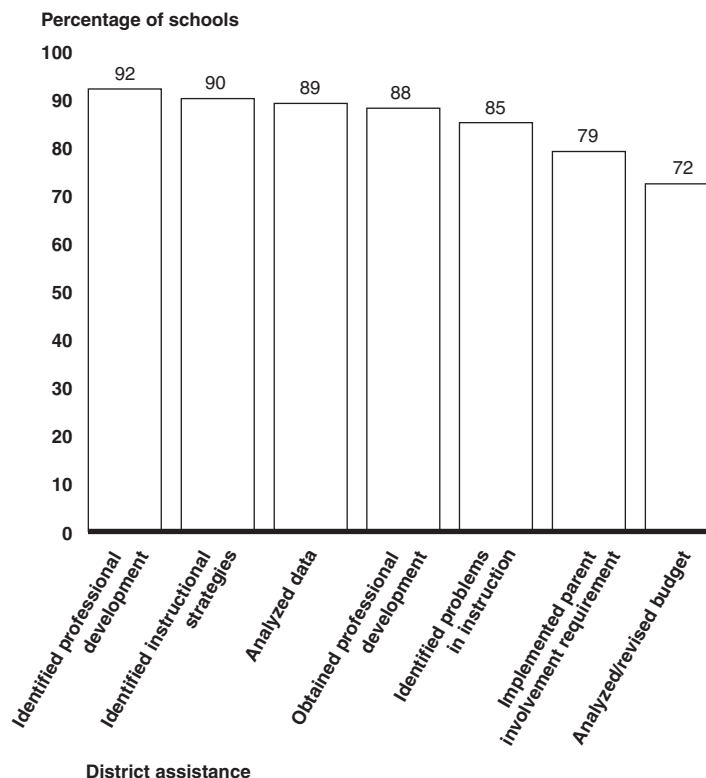
We estimate that more than 40 percent of the schools in corrective action and restructuring did not receive all of the required technical assistance, such as data analysis and professional development, through their school district, but most of the schools received some technical assistance from their state. While states generally are not required to provide specific kinds of assistance to schools, they are required to develop a statewide system of support that is available to schools and districts and to provide technical assistance to schools if the district fails to do so. Most schools reported receiving technical assistance from their state educational agency, such as help from instructional experts or highly skilled educators.

³⁶Our prior work has also documented some administrative challenges associated with student mobility. See [GAO-05-879, No Child Left Behind Act: Education Could Do More to Help States Better Define Graduation Rates and Improve Knowledge about Intervention Strategies](#) (Washington, D.C.: Sept. 20, 2005).

Many Schools in Corrective Action and Restructuring Did Not Receive All Required Assistance through Districts

We estimate that 42 percent of the schools in corrective action and restructuring had not received all of the required assistance in school year 2005-2006 while about 56 percent did. Schools most frequently received technical assistance related to professional development (92 percent) and instructional strategies (90 percent). However, only about 70 percent received assistance with analyzing the school budget to ensure that resources were allocated toward improving student achievement. We also found, based on our survey results, that 7 out of 313 schools (about 2 percent) in corrective action and restructuring received no assistance. (See fig. 8 for the percentage of schools receiving each type of required technical assistance.)

Figure 8: The Estimated Percentage of Schools in Corrective Action and Restructuring That Received Each Form of Required Technical Assistance through Districts in School Year 2005-2006



Source: GAO survey.

Education officials noted that through their monitoring site visits they found that some districts had not provided all of the assistance required. In these instances, Education officials said states could withhold Title I

funds from the districts that are out of compliance. However, Education could not tell us how often states take actions against districts for not providing required assistance, because according to one Education official, Education did not collect this information from states.

Generally, school officials we met with told us that the district was actively involved in providing assistance to their schools. Almost all school principals and teachers that we interviewed specifically emphasized district efforts to train their administrators and teaching staff to analyze and use student testing data to target their instruction to areas of academic weakness and to students that needed additional assistance. In addition, they said that districts had targeted resources to provide professional development and implement effective instructional practices. For example, in most districts we visited, school officials said that literacy or math coaches had been hired to provide staff development or to work with teachers to identify instructional practices to improve instruction. Also, in some schools we visited, officials told us that districts assisted the schools in their efforts to increase parental involvement. For example, in New York City, the district helped some schools by approving a parent coordinator position to get parents more involved in their schools. Officials in some districts also reported reviewing school budgets to ensure that resources are allocated to programs that target student performance. In regard to budget assistance, district officials in Chicago told us that they must approve budgets of all schools in restructuring. In addition, principals in two California schools reported that the district reviewed their budgets and recommended expenditures that targeted school improvement activities.

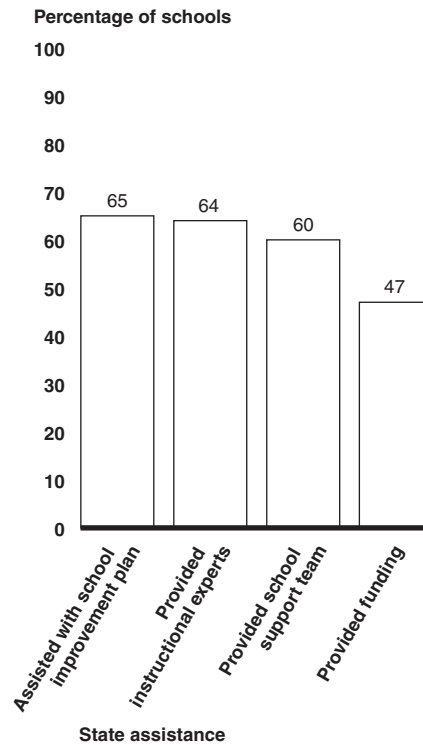
Most Schools Received Some Assistance from State Educational Agencies, and Almost Half of Schools Received State Funds for School Improvement

Most schools received some assistance from their state educational agency, and almost half received state funds for school improvement. States are required to develop a statewide system of support that is available to assist districts. As a part of this system, states must create school support teams, which are composed of various participants, including highly qualified or distinguished educators, such as teachers and principals who can assist the school in strengthening its instructional program to improve student achievement. We estimate that about 65 percent of schools received assistance from their state educational agency in developing the school improvement plan, and 60 percent received assistance from a school support team (fig. 9). Although state educational agencies generally are not required to provide specific kinds of technical assistance to schools in corrective action and restructuring, they are required to ensure that districts are providing all of the required

assistance to schools identified for improvement, and if the district has not, state educational agencies must step in and provide the assistance.

An estimated 47 percent of the schools in corrective action and restructuring received state funds for school improvement activities in addition to federal Title I funds. While state funds were used for many different kinds of school improvement activities, more than 75 percent of the schools surveyed used the funds for professional development activities, classroom support such as instructional and resource materials, or both. In addition, officials in four of the five states we visited told us that schools received state funds for school improvement activities. Maryland provides its schools guidelines on how the funds can and cannot be used and the guidelines emphasize that whenever possible, the funds should be used to improve instruction, such as purchasing textbooks or hiring more school staff. Schools in California and New York apply for state funds and must include a plan for how the funds will be used.

Figure 9: Estimated Percentage of Schools in Corrective Action and Restructuring in 2005-2006 That Received State Assistance



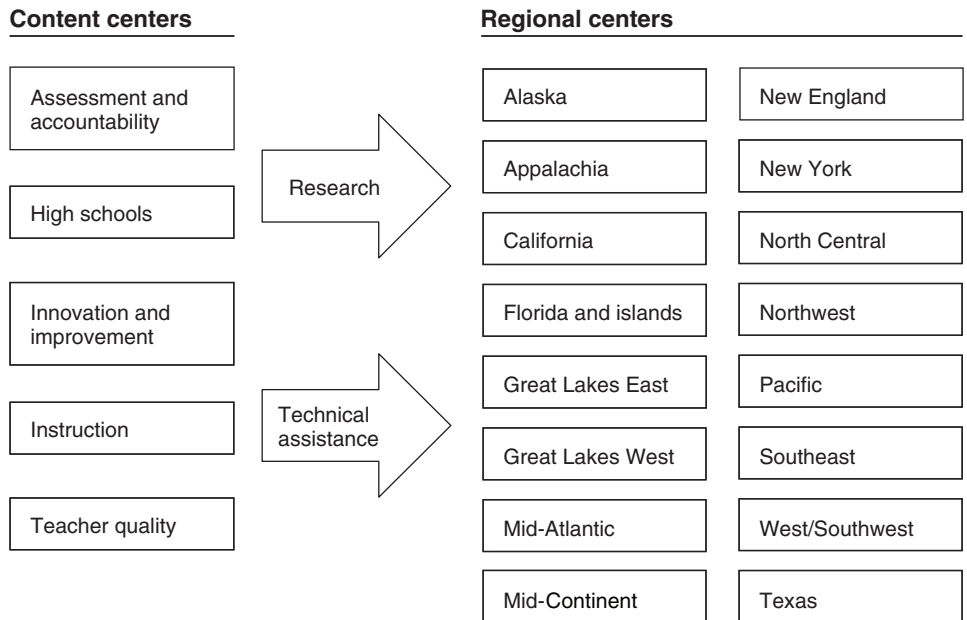
Source: GAO survey.

Education Provides Technical Assistance and Research on School Improvement, Including Some Specific Information on School Restructuring

Education provides technical assistance and research results to states primarily through its Comprehensive Centers Program, consisting of 16 regional centers and 5 content centers (fig. 10). The department replaced its former assistance centers and various education consortia to meet the requirements of the Education Sciences Reform Act of 2002.³⁷ The primary task of the content centers is to provide knowledge and assistance by experts in school improvement to regional centers. The regional centers are to provide technical assistance to states on a wide range of topics related to NCLBA, in part based on information provided by the content centers.

³⁷The comprehensive centers under this program replaced the former Comprehensive Regional Assistance Centers, the Regional Technology in Education Consortia, the Eisenhower National Clearinghouse for Mathematics and Science Education, and the Regional Mathematics and Science Education Consortia.

Figure 10: Education’s Content and Regional Centers



Source: GAO Illustration of Education’s Comprehensive Centers Program.

One content center, the Center on Innovation and Improvement, provides a variety of services related to school improvement. The center developed a guide, *Handbook on Restructuring and Substantial School Improvement*,³⁸ which it has disseminated to regional centers, state educational agencies, and other organizations. The handbook provides information on using student data to identify a restructuring option and focusing instruction on state standards, among other topics. Other services include the center’s annual 2-day training for representatives from the regional centers and additional workshops throughout the year on various improvement topics. The center produced a series of Web-based seminars during the spring and summer of 2007, also based on the handbook, for use by the regional centers. In addition, each regional center has developed an annual work plan, negotiated with the states for which it is responsible. For example, the New York Regional Center provides assistance to the state of New York and has negotiated a work plan with several goals related to school improvement. One goal is to help

³⁸See Herbert J. Walburg, editor. “*Handbook on Restructuring and Substantial School Improvement*” (Center on Innovation and Improvement, Lincoln, Ill.: 2007).

the New York State Education Department build its school improvement capacity by assisting with delivery of research-based professional development related to adolescent literacy.

Education developed the What Works Clearinghouse to review studies of educational interventions to determine which studies were conducted with a sound methodology and to what extent the interventions are effective. The clearinghouse has reviewed studies on topics such as preventing dropouts and increasing elementary and middle school achievement in mathematics. While these topics are likely to be of interest for schools in corrective action and restructuring, the clearinghouse has not reviewed studies that specifically deal with practices employed by schools in corrective action and restructuring. Moreover, several state, district, and school officials we interviewed indicated that they needed more information on practices for improving schools in corrective action and restructuring. For example, an official in one district told us that they had been attempting to create their own approaches to improve schools, but said that there was insufficient information, from federal or other sources, on improvement practices. Recognizing the need for information that may be more suited for teachers, principals, and other educators, Education officials reported that the department will launch a Web site in September 2007 related to their initiative, Doing What Works. Through this initiative, Education would review studies identified by the clearinghouse and develop materials, called “practice guides” for educators. According to Education, a practice guide on school restructuring is in development and may be available by the end of 2007.

In addition to the Comprehensive Centers and What Works Clearinghouse programs, Education implemented a variety of other initiatives that may assist officials in their efforts to improve schools. The department revised its guidance in July 2006 to provide more information on school restructuring. In addition, Education operates 10 Regional Education Laboratories that provide research on a variety of topics. For example, the Northwest Regional Education Laboratory is currently examining statewide systems of support and the factors that have helped schools make AYP. The laboratories are also available to provide assistance to any entity, such as school districts or schools, that may request information from them. Other resources include the Support for School Improvement newsletter, developed by the Council of Chief State School Officers and funded in part by Education. The newsletter focuses on topics such as school improvement policies and closing achievement gaps among student groups. Education also funds a clearinghouse for Comprehensive School Reform, which disseminates research on effective approaches to school

reform through publications such as a recent report on what improvement practices might work for schools in restructuring.³⁹

Conclusions

Schools that reach corrective action and restructuring status face many challenges in raising the achievement levels of their students. These schools typically serve low-income students, and many report that factors such as neighborhood violence and student mobility pose additional challenges to engaging students and improving their academic performance. While most of these schools have implemented activities that are required by NCLBA, it is possible that a significant number of schools have not. Although Education has made efforts to provide guidance to districts on what actions are required and when, the department's efforts do not address several specific issues that would allow states, districts, and schools to make well informed decisions that are in compliance with NCLBA. For example, many schools in corrective action continued efforts implemented previously but did not implement a new action. While this course of action may be a reasonable and appropriate path for some schools to take, Education has not provided guidance to districts delineating when continuing a corrective action—and not taking an additional one—is appropriate and when it is not. Without written guidance, some districts and schools that are not demonstrating sustained improvement may continue previous efforts in order to avoid having to make more changes. On the other hand, some districts may not know they can comply with NCLBA by continuing an action that is moving their schools forward and instead may be struggling to choose another prescribed activity that is not needed.

While Education monitors states to ensure compliance with NCLBA—and has found deficiencies in some districts' reviews of schools' improvement plans—department officials told us that they were unaware that some districts may not be implementing the required corrective action and restructuring activities because they do not collect that specific information. Collecting information on the activities of schools in corrective action and restructuring and on compliance issues identified by states would better position Education to target its guidance and monitoring on areas of greatest need.

³⁹Learning Point Associates, *School Restructuring Under No Child Left Behind: What Works When? A Guide for Education Leaders*. (Naperville, Ill.: 2007).

Finally, our review indicates that many schools may not be receiving all the types of assistance that they are supposed to receive through their districts. However, Education officials told us that they have not found any instances in which schools in corrective action and restructuring have not received required assistance, and officials noted that Education does not track the extent to which states also have found such incidences. Schools that are not receiving this assistance might not be able to make the kinds of dramatic improvement needed for their students, in part because they may not be receiving the resources to improve as envisioned by NCLBA.

Recommendations

The Secretary of Education should:

- Ensure that guidance is provided to states and districts about when it may be appropriate to allow schools to continue corrective action implemented in earlier years of improvement and not take a new activity as the school moves into corrective action status.
- Obtain more specific information from states on district implementation, such as the primary activity that each school in corrective action and restructuring is implementing as well as more specific information on compliance issues states have identified as part of their monitoring activities. This information should be analyzed to identify areas where further federal guidance is needed and to ensure that areas of noncompliance are being addressed by states.
- Take additional steps through Education’s monitoring process to ascertain whether states are ensuring that districts provide the assistance required by NCLBA.

Agency Comments and Our Evaluation

Education provided us with written comments on a draft of this report. Education agreed with our three recommendations to provide more guidance to states and districts, obtain more information on district implementation of corrective action and restructuring activities, and take additional steps to determine whether districts are providing assistance required by NCLBA. Specifically, Education agreed to explore options for sharing guidance on when schools may continue a corrective action while not taking a new one and commented that it will explore sharing guidance that address other issues related to schools in corrective action and restructuring that it has asked states to identify. While Education noted that it is generally informed on the actions taken in schools in corrective action and restructuring, it agreed that more information is needed from

states on district implementation of corrective action and restructuring activities and that it will consider options for gathering additional evidence on how states ensure that districts are complying with corrective action and restructuring requirements. Finally, Education agreed to consider ways for revising its monitoring procedures in order to obtain more information on how states determine whether districts are providing technical assistance to these schools, the types of assistance they provide, and the actions states take to address areas of noncompliance. See appendix III for Education's comments. Education also provided us with a few technical comments that we incorporated.

We are sending copies of this report to the Secretary of Education and other interested parties. We will also make copies available to others upon request. In addition, the report will be made available at no charge on GAO's Web site at <http://www.gao.gov>.

Please contact me at (202) 512-7215 if you or your staff have any questions about this report. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Major contributions to this report are listed in appendix IV.



Cornelia M. Ashby
Director, Education, Workforce,
and Income Security Issues

Appendix I: Scope and Methodology

To address the objectives of this study, we used a variety of methods. To obtain a national perspective, we conducted descriptive analyses of characteristics of schools in corrective action and restructuring and compared them to all other Title I schools nationwide. We selected a nationally representative sample of these schools and conducted two Web-based surveys—one of principals whose schools were in corrective action and another for schools implementing restructuring—to obtain information on implementation of corrective action and restructuring and school district and state assistance to such schools. We also conducted site visits during which we interviewed state, district, and school officials representing 5 states and 10 school districts within these states, and we conducted phone interviews with state officials from 4 other states. We spoke with officials at Education involved in oversight and implementation of corrective action and restructuring in schools and reviewed Education’s data on schools identified for improvement. We also interviewed several experts in the field of school improvement. We reviewed federal laws, regulations, and agency guidance. We conducted our work from August 2006 through August 2007 in accordance with generally accepted government auditing standards.

Objective 1: Analysis of School Characteristics

To address the first objective, we obtained lists of schools in corrective action, planning for restructuring, and implementing restructuring status and their school districts from Education. States submitted these lists to Education through the No Child Left Behind Act (NCLBA) Consolidated State Performance Reports (CSPR) for school year 2004-2005, which contained each school’s improvement status for the 2005-2006 school year, among other data. Because states provided the names of schools in corrective action and restructuring in their 2004-2005 CSPRs, these schools comprised the national population of such schools. In some cases, states used different labels for identifying schools in corrective action and restructuring. For example, one state identified schools in corrective action by labeling them as “Year 3” schools. When states used terms other than corrective action and restructuring to indicate schools’ improvement status, we contacted state officials to clarify the label the state used. Education also provided us with numbers of schools in corrective action and restructuring for the 2006-2007 school year, which we compared to numbers from prior years. On the basis of our review of the data on improvement status for school years 2005-2006 and 2006-2007, we determined these sources to be sufficient for the purposes of our work. We used the lists of schools in corrective action and restructuring for the 2005-2006 school year to develop our survey samples and for comparisons with other Title I schools not identified as needing improvement.

Also in the CSPR, states provided each school’s nationally unique identification number, allowing us to link data on these schools with data provided in Education’s Common Core of Data (CCD). The CCD is a database of Education’s National Center for Education Statistics, which annually collects data from state educational agencies about all public schools, public school districts, and state educational agencies in the United States. At the time we began our analysis, the latest CCD data available were from the 2004-2005 school year. Although we based our analysis on schools in corrective action and restructuring in 2005-2006, the characteristics were based on one year prior. Upon linking schools identified in the CSPR to those in the CCD, we obtained data on the following characteristics:

- locale: whether the school was located was in an urban, suburban, or rural area or town;
- minority status: the percent of students in the school classified as American Indian/Alaskan Native, Asian/Pacific Islander, Black/Non-Hispanic, or Hispanic;
- poverty status: the percent of students in the school who qualified for free- or reduced-priced meals; and
- grade levels served: whether primary, middle, or high school grades. To define these levels, we used the definitions provided in the CCD, as listed in table 9.

Table 9: Grade Level Definitions

Grade level served	Low grade	High grade
Primary	Pre-kindergarten to 3	Up to 8
Middle	4 to 7	4 to 9
High	7 to 12	12

Source: Common Core of Data.

Schools that did not fit these grade-level configurations were classified as “other,” meaning any other combination, from the low grades of prekindergarten, kindergarten or first grade up to twelfth grade, consistent with the CCD definition.

We compared the percentage of schools in corrective action and restructuring with all other Title I schools within each category of the

characteristics of locale and grade levels served. For minority status and poverty status, we compared schools in corrective action and restructuring with all other Title I schools by comparing the characteristics of the median school within each group.¹ The median is the school in the middle of a list of schools when they are listed from highest to lowest along any given characteristic, such that one-half of the schools are listed above and the other half are listed below that school. For example, when all corrective action and restructuring schools were listed from highest to lowest in terms of poverty status, the school in the middle of that list had a poverty rate of 96 percent. In contrast, when all other Title I schools were listed from highest to lowest, the school in the middle of that list had a poverty rate of 37 percent. We chose to use the median school instead of calculating the average for all schools or all students, because so many schools had high rates of poverty and minority student representation, that the median more accurately characterized the typical school in our dataset than did the average.

We performed a series of tests and took additional steps as needed to assess the reliability of the data used. For the lists of schools obtained in the CSPR and the CCD, we checked to ensure that data were consistent, that subtotals added to overall totals and that data provided for 1 year bore a reasonable relationship to the next year's data and to data reported elsewhere, including state education reports. We also spoke with Education officials about their follow-up efforts to verify the data. At the time of our review, Education reported that the 2004-2005 data had been verified.

On the basis of our review of these data, we determined these sources to be sufficiently reliable for the purposes of our work. We also considered school improvement-related findings from Education studies, including the *National Assessment of Title I Interim Report, Vol. 1: Implementation (2006)*. To ensure the findings from these studies were sufficiently reliable, we reviewed each study's methodology, including data sources and analyses, limitations, and conclusions. We found these studies to be sufficiently reliable for the purposes of our work.

¹We also used locale (urban, suburban, town/rural) to enhance our analyses of minority status and poverty status in order to account for the clustering of minority students and students who are poor in urban areas.

Objectives 2 and 3: Implementation of Corrective Action and Restructuring and State and District Assistance

To address the second objective on school's implementation of corrective action and restructuring and the third objective on district and state assistance, we designed and administered two Web-based surveys to a nationally representative sample of school principals: one for schools in corrective action and one for schools in restructuring, as of the 2005-2006 school year. The surveys were conducted between January and March 2007. To obtain the maximum number of responses, we sent follow-up e-mail notifications with a link to the surveys to those who had not completed the survey approximately 1 week after the initial launch and additional six follow-up notifications every week thereafter. In addition, approximately 3 weeks after the Web surveys began, we provided a mail survey to those who had not responded. The surveys included questions about corrective actions or restructuring options the school had taken. Both surveys included questions about factors that may have influenced student achievement and assistance provided by the state and district. We also conducted site visits to 5 states and 10 school districts and 20 schools within these states, during which we conducted interviews and obtained documentation on school improvement efforts and related topics. Finally, we reviewed Education's regulations, guidance, and monitoring tools and interviewed department officials about monitoring and guidance related to corrective action and restructuring. Specifically, we reviewed the NCLBA, associated regulations, Local Education Agency and School Improvement Guidance (revised July 2006), monitoring tools and indicators used during Education's site visits, and selected monitoring reports and findings.

Corrective Action Survey

Sample Design and Errors

Based on data obtained from the CSPR, the study population of 1,163 schools consisted of all public Title I schools that were in corrective action in the 2005-2006 school year. We selected a random sample of schools in the population and calculated the sample size to achieve a precision of plus and minus 8 percent at the 95 percent confidence level for an expected proportion of 50 percent.² To ensure the sample sizes were adequate, we set the sample size assuming we would obtain a 70 percent response rate. The total sample size was 240 schools. In the sample, each school in the population had a known, nonzero probability of being selected. Each selected school was subsequently weighted in the analysis

²Since the margin of error for a proportion estimate with a given sample size is greatest at 50 percent, we were conservative when planning the sample size.

to account statistically for all the schools in the population, including those that were not selected.

Because we surveyed a sample of schools, survey results are estimates of a population of schools and thus are subject to sampling errors that are associated with samples of this size and type. Since we followed a probability procedure based on random selections, our sample is only one of a large number of samples that we might have drawn. As each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as a 95 percent confidence interval (for example, plus or minus 8 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples we could have drawn. As a result, we are 95 percent confident that each of the confidence intervals in this report will include the true values in the study population. We excluded 8 of the sampled schools, because they were not in corrective action status in the 2005-2006 school year, were not Title I schools or had closed, and therefore were considered out of scope. All estimates produced from the sample and presented in this report are representative of the in-scope population. All percentage estimates included in this report have margins of error of plus or minus 8 percentage points or less, unless otherwise noted.

We took steps to minimize nonsampling errors that are not accounted for through statistical tests, like sampling errors. In developing the Web survey, we conducted several pretests of draft instruments. We pretested the survey instrument with school officials in Aurora, Illinois; Berkeley, California; and Orange, New Jersey, between October and November 2006. We selected schools in these states because they contained large numbers of schools in corrective action and thus it was likely that schools from these states would be included in our sample. In the pretests, we were generally interested in the clarity of the questions and the flow and layout of the survey. For example, we wanted to ensure definitions used in the surveys were clear and known to the respondents, categories provided in closed-ended questions were complete and exclusive, and the ordering of survey sections and the questions within each section was appropriate. We revised the survey on the basis of information we gathered in the pretests.

A second step we took to minimize nonsampling errors was using a Web-based survey. By allowing respondents to enter their responses directly into an electronic instrument, this method automatically created a record for each respondent in a data file and eliminated the need for and the errors (and costs) associated with a manual data entry process. To further minimize errors, programs used to analyze the survey data and make

estimations were independently verified to ensure the accuracy of this work.

While we did not fully validate specific information that school officials reported in our survey, we took several steps to ensure that the information was sufficiently reliable for the purposes of this report. For example, data from mailed surveys were double-keyed to ensure data entry accuracy, and the information was analyzed using statistical software. We obtained corroborating evidence of schools' improvement status when the information provided by the school conflicted with the information we had received from the Department of Education. In addition, we verified the responses of those schools that reported that the school had made AYP. When survey responses did not align with the information that we obtained from state Web sites and school report cards, we made changes to the survey responses based on documentary evidence. After the survey was closed, we also made comparisons between select items from our survey data and another national-level data set.³ We found our survey data were reasonably consistent with the external sources. On the basis of our checks, we believe our survey data are sufficiently reliable for the purposes of our work.

Response Rate

We received survey responses from 68 percent of the Title I schools in corrective action in our sample. After the survey was closed, we analyzed the survey respondents to determine if there were any differences between the responding schools, the nonresponding schools, and the population. We performed this analysis for four characteristics—percentage of minority students, percentage of students with free lunch, region, and locale. We found no significant differences between the estimates for the survey respondents and the overall population values for these characteristics. On the basis of the 68 percent response rate and this analysis, we chose to include the survey results in our report and produce sample-based estimates to the population of schools in corrective action in the 2005-2006 school year.

³We compared our district survey data to data on schools in corrective action reported by Education in the *National Assessment of Title I Interim Report , Vol. 1: Implementation*, Institute of Education Sciences (Washington, D.C.: February 2006).

Restructuring Survey

Sample Design and Errors

The study population of 920 schools consisted of public Title I schools that were implementing restructuring in the 2005-2006 school year. This population was obtained from the CSPR data provided by Education, as described above. We used the same sample design for the restructuring Web survey as the design used for the corrective action survey. The total sample size was 230 schools.

We determined that 12 of the sampled schools were out of scope because they were not implementing restructuring in the 2005-2006 school year. All estimates produced from the sample and presented in this report are representative of the in-scope population. All percentage estimates included in this report have margins of error of plus or minus 8 percentage points or less, unless otherwise noted.

As with the corrective action survey, we took steps to minimize nonsampling errors. We pretested the survey instrument with school officials in Detroit, Michigan and Syracuse, New York, between October and November 2006. We selected schools in these states because the states contained large numbers of schools implementing restructuring and thus it was likely that schools from these states would be included in our sample. The pretests were conducted in the same manner as those done for the corrective action survey. On the basis of the pretests, the Web instrument underwent some revisions. Again, use of a Web-based survey also minimized nonsampling errors as did independently verifying programs used to analyze the survey data and make estimations.

Steps taken to ensure that the information was sufficiently reliable for the purposes of this report mirror those taken for the corrective action survey, including obtaining corroborating evidence of schools' improvement status when the information provided by the school conflicted with the information we had received from the Department of Education. When a survey response did not align with the information that we obtained from state Web sites and school report cards, we made changes based on our documentary evidence. We checked a sample of schools that claimed to have made AYP to verify these responses and found that the responses were accurate. Again, we made comparisons between select items from

our survey data and other national-level data sets,⁴ and found our survey data were reasonably consistent with the external sources. On the basis of our checks, we believe our survey data are sufficient for the purposes of our work.

Response Rate

We received survey responses from 74 percent of the Title I schools implementing restructuring in our sample. After the survey was closed, we analyzed the survey respondents to determine if there were any differences between the responding schools, the nonresponding schools, and the population, as was done for the corrective action survey. We found no significant differences between the estimates for the survey respondents and the overall population values for these characteristics. On the basis of the 74 percent response rate and this analysis, we chose to include the survey results in our report and produce sample-based estimates to the population of schools in restructuring in the 2005-2006 school year.

Combined Surveys

Many of the questions on the corrective action survey and restructuring survey were the same. For example, on both surveys we asked about the assistance provided by the state and district, the factors that impeded or facilitated student achievement, and the factors that helped or hindered implementation of school improvement efforts. For such questions, we combined the survey responses for reporting purposes. We weighted the respondents so that the estimates are for the in-scope combined population of corrective action and implementing restructuring schools. Because we surveyed a sample of schools, our results are estimates of a population of Title I schools in corrective action and implementing restructuring and thus are subject to sampling errors that are associated with samples of this size and type. All percentage estimates included in this report have margins of error of plus or minus 8 percentage points or less, unless otherwise noted.

⁴We compared our district survey data to data on schools in restructuring reported by Education in the *National Assessment of Title I Interim Report, Vol. 1: Implementation*, Institute of Education Sciences (Washington, D.C.: February 2006). We also compared our survey data to data on schools in restructuring reported by the Center on Education Policy in *Wrestling the Devil in the Details: An Early Look at Restructuring in California* (Washington, D.C.: February 2006).

Site Visits

To understand corrective action and restructuring implementation at the local level, we conducted site visits to 5 states and 10 districts and 20 schools within these states between October 2006 and March 2007. The 5 states we chose were: California, Illinois, Maryland, New York, and Pennsylvania. Together, these 5 states had 59 percent of schools in corrective action and restructuring nationwide in the 2005-2006 school year and are located in a variety of geographic regions. We interviewed state officials on state efforts to oversee and assist schools in corrective action and restructuring.

Within each of the 5 states, we visited 2 school districts, for a total of 10 school districts, as shown in table 10. The 10 districts were selected because they had experience implementing corrective action and restructuring. When viewed as a group, the districts also provided variation across characteristics such as geographic location and district size.

Table 10: School Districts Selected for Site Visits

School District	City, State
Baltimore City Public School System	Baltimore, Md.
Brentwood Union Free School District	Brentwood, N.Y.
Chicago Public Schools	Chicago, Ill.
East Aurora School District #131	Aurora, Ill.
Los Angeles Unified School District	Los Angeles, Calif.
New York City Department of Education	New York, N.Y.
Pomona Unified School District	Pomona, Calif.
Prince George’s County Public Schools	Upper Marlboro, Md.
School District of Philadelphia	Philadelphia, Pa.
York City School District	York, Pa.

Source: GAO.

During the site visits, we interviewed state and district officials as well as officials representing 20 schools, including principals, teachers, and other school staff involved with school improvement activities in order to provide in-depth information and illustrative examples of our more general findings. The selected schools resembled the population of schools in corrective action and restructuring in terms of the grade levels served, and the students’ racial, ethnic, and economic characteristics. While in many cases district officials selected the schools we visited, all of the schools had experience implementing corrective action or restructuring. Through

our interviews with state, district, and school officials, we collected information on corrective actions and restructuring options implemented, factors affecting student achievement, and state and district assistance provided to schools in corrective action and restructuring.

**Objective 4:
Education's Efforts to
Support State
Implementation**

To address the fourth objective on Education's efforts to assist states' implementation of corrective action and restructuring provisions, we conducted interviews with representatives of the offices of Title I, Planning, Evaluation, and Policy Development, What Works Clearinghouse, Comprehensive Centers Program, and General Counsel. We also interviewed officials with the Center on Innovation and Improvement, the California and New York Regional Centers, and the Northwest Regional Education Laboratory.

In addition, we interviewed experts in the field on school improvement, including those at the American Institutes for Research, Center on Education Policy, Council of the Great City Schools, Council of Chief State School Officers, Education Commission of the States, and RAND Corporation. We reviewed several studies on school improvement, corrective action, and restructuring.

Appendix II: Number of Schools in Corrective Action, Planning for Restructuring, and Implementing Restructuring, by State in 2005-2006 and 2006-2007

Table 11: Number of Schools in Corrective Action, Planning Restructuring, and Implementing Restructuring, by State in 2005-2006 and 2006-2007

State	2005-2006				2006-2007			
	Corrective Action	Planning for Restructuring	Implementing Restructuring	Totals	Corrective Action	Planning for Restructuring	Implementing Restructuring	Totals
Alabama	0	13	27	40	3	5	18	26
Alaska	34	5	8	47	35	30	12	77
Arizona	25	20	4	49	36	12	14	62
Arkansas	4	1	0	5	54	19	4	77
California	406	153	247	806	482	343	357	1,182
Colorado	22	13	3	38	21	16	14	51
Connecticut	4	0	6	10	63	1	6	70
Delaware	2	0	0	2	3	0	1	4
District of Columbia	45	0	0	45	33	0	0	33
Florida	32	0	0	32	544	30	0	574
Georgia ^a	19	0	66	85	23	19	48	90
Hawaii	2	13	41	56	38	3	50	91
Idaho	0	0	0	0	12	0	0	12
Illinois	151	211	20	382	93	177	138	408
Indiana	10	9	6	25	18	6	9	33
Iowa	0	0	0	0	4	0	0	4
Kansas	0	2	0	2	3	2	0	5
Kentucky	3	6	0	9	56	1	5	62
Louisiana	23	0	6	29	3	4	0	7
Maine	0	0	0	0	4	0	0	4
Maryland	6	6	41	53	15	2	46	63
Massachusetts	32	10	19	61	129	24	26	179
Michigan	22	40	58	120	46	16	37	99
Minnesota	7	1	0	8	10	3	0	13
Mississippi	0	1	1	2	12	0	1	13
Missouri ^b	0	7	0	7				
Montana	0	0	30	30	4	1	31	36
Nebraska	0	2	0	2	0	1	0	1
Nevada	16	2	0	18	18	9	0	27
New Hampshire	1	0	0	1	2	0	0	2
New Jersey	34	61	0	95	100	16	49	165
New Mexico	16	28	24	68	29	17	48	94

Appendix II: Number of Schools in Corrective Action, Planning for Restructuring, and Implementing Restructuring, by State in 2005-2006 and 2006-2007

State	2005-2006				2006-2007			
	Corrective Action	Planning for Restructuring	Implementing Restructuring	Totals	Corrective Action	Planning for Restructuring	Implementing Restructuring	Totals
New York	95	43	147	285	67	77	166	310
North Carolina	12	5	0	17	59	10	2	71
North Dakota	3	2	3	8	3	2	14	19
Ohio	25	24	29	78	76	19	33	128
Oklahoma	3	3	4	10	10	3	2	15
Oregon	0	1	0	1	9	0	1	10
Pennsylvania	30	5	83	118	29	15	63	107
Rhode Island	6	2	0	8	9	2	2	13
South Carolina	26	6	7	39	69	27	10	106
South Dakota	13	0	2	15	7	12	2	21
Tennessee	0	13	24	37	10	1	19	30
Texas	3	0	0	3	33	2	0	35
Utah	1	0	1	2	0	0	1	1
Vermont	0	0	0	0	2	0	0	2
Virginia	9	3	0	12	12	2	2	16
Washington	6	9	0	15	26	4	8	38
West Virginia	1	0	1	2	6	0	1	7
Wisconsin	6	7	0	13	7	4	2	13
Wyoming	0	0	0	0	3	0	0	3
Totals	1,155	727	908	2,790	2,330	937	1,242	4,509

Source: GAO analysis of Education data.

^aFor the 2005-2006 school year, Georgia required schools in corrective action to plan for restructuring. We reported these schools as in status as corrective action.

^bFor the 2006-2007 school year, Missouri had yet to report which of its schools were identified for improvement, corrective action, or restructuring.

Appendix III: Comments from the Department of Education



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

July 25, 2007

THE ASSISTANT SECRETARY

Ms. Cornelia M. Ashby
Director, Education, Workforce
and Income Security Issues
Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Ashby:

I am writing in response to your request for comments on the Government Accountability Office's (GAO's) draft report (GAO 07-1035) dated September 2007, entitled "No Child Left Behind Act: Education Should Clarify Guidance and Address Potential Compliance Issues for Schools in Corrective Action and Restructuring Status." I appreciate the opportunity to comment on the draft report.

The following are responses to the recommendations in the report to take actions to support implementation of corrective action and restructuring in Title I schools required to take these actions:

Recommendation 1. Ensure that guidance is provided to states and districts about when it may be appropriate to allow schools to continue corrective action implemented in earlier years of improvement and not take a new activity as the school moves into corrective action status.

The Department agrees with this recommendation and will explore options for sharing not only the guidance recommended above but also guidance addressing other issues related to schools in corrective action and restructuring. Department staff discussed this issue at a meeting with State Title I directors in July 2007 and will also ask the State directors to identify other areas where guidance is needed.

Recommendation 2. Obtain more specific information from states on district implementation, such as the primary activity that each school in corrective action and restructuring is implementing as well as more specific information on compliance issues states have identified as part of their monitoring activities. This information should be analyzed to identify areas where further federal guidance is needed and to ensure that areas of noncompliance are being addressed by states.

The Department does have general information on the actions taken in schools in corrective action and restructuring, gathered as part of the National Assessment of Title I, and Federal monitors do interview staff of schools in corrective action and restructuring as part of the Department's on-site monitoring. However, we agree that there is a need

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for more information from States on district implementation of corrective action and restructuring. The Department will explore options for how this might be accomplished.

With regard to compliance, the Department's existing monitoring protocol requires States to provide evidence of how they monitor their school districts to ensure compliance with Title I, Part A requirements. Federal monitors examine State monitoring reports for the school districts visited on site. The Department will review its monitoring process and consider possible options for gathering additional evidence of how States are ensuring that school districts comply with corrective action and restructuring requirements and on the procedures States use for addressing areas of noncompliance.

Recommendation 3. Take additional steps through Education's monitoring process to ascertain whether states are ensuring that districts provide the assistance required by NCLBA.

The Department agrees with this recommendation. Our current monitoring process requires each school district receiving an on-site visit to provide evidence that it has provided, or provided for, technical assistance grounded in scientifically based research to schools in improvement, corrective action, or restructuring. As with recommendation 2, we will consider options for revising our monitoring procedures to gather additional information on: (1) how States determine whether districts are providing technical assistance to schools in corrective action and restructuring and what types of assistance they provide, and (2) the follow-up actions States take to address areas of noncompliance.

We appreciate the opportunity to share our comments and plans. Enclosed please find some recommended technical edits to the report for your consideration.

Please let me know if you need additional information regarding activities underway at the Department to help States implement corrective action and restructuring in schools.

Sincerely,



Kerri L. Briggs

Enclosure

Appendix IV: GAO Contacts and Acknowledgments

GAO Contact

Cornelia M. Ashby, (202) 512-7215, ashbyc@gao.gov

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Bryon Gordon, Assistant Director, and Elizabeth Morrison managed the assignment. Cara Jackson, Jason Palmer, and Nancy Purvine made significant contributions to this report in all aspects of the work. Susannah Compton, Nancy Hess, Jean McSween, and Jerome Sandeau provided analytical assistance. Sheila McCoy provided legal support, and Karen Burke developed the report's graphics.

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