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Education Reform and Services to Poor Students: Can the Two Policies Be Compatible?

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March 1987

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Executive Summary

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This paper discusses the interaction between comprehensive education reforms and curricular services for special-needs students-mainly economically disadvantaged students eligible for state and federal compensatory education services.

Concern about interaction between current education reforms and past categorical programs fuses several central issues that have evolved with federal and state educational program implementation, such as: (1) can top-down initiatives for change work, (2) what rules and regulations are needed to ensure faithful implementation of key programmatic goals, (3) what local discretion is needed to ensure local commitment to substantive program elements, and (4) what central government strategies are needed to produce high program quality?

Experience during the first 15 years of federal and state categorical program implementation demonstrated that central government initiatives to provide extra services to selected students can work but implementation takes time (10-15 years) and a clear regulatory structure is needed to ensure faithful implementation and to maintain the redistributive and targeted nature of the programs.

Yet regulations beyond those needed to ensure program integrity can encroach on the decision-making domain of teachers delivering services to students and can upset the balance between regulation and local autonomy that is needed to ensure both program integrity and program quality. Categorical program regulation ensured program integrity, not program quality. In fact, quality had eroded from regular program curricula and had never been firmly developed for most categorical programs. The education reform movement emerged in 1983 to focus on education quality issues.

The irony behind the concern that the education reform movement might derail education equity programs is that the dilemma for equity programs was precisely the issue addressed by the excellence movement: how to improve the quality of local school programs and the performance of students.

California has addressed these issues by adopting a relatively complex set of strategies designed to increase local capacity and leeway for reconciling and integrating the demands of education reform and categorical program reform. In short, California has adopted strategies that: (1) fuse categorical program curricula with the core academic curricula; (2) include top-down mandates for the structure of the core curriculum program, the content for school site education improvement, and the targeted and redistributive nature of categorical programs including compensatory education programs; and (3) place responsibility for the details of program quality design, implementation, and evaluation in the hands of local school and district educators.

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These initiatives represent a strategic mix of compliance and assistance mechanisms and of top-down and bottom-up mechanisms. They retrieve categorical program services from the periphery of the regular school program and integrate them fully and directly into the core of schools. Both the mix of strategies and their interconnectedness is relatively unique across the 50 states. 1

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Data from nine schools in three California school districts provide encouraging evidence that the strategies seem to be taking hold at the school level including the intended effects on students receiving compensatory education services.

• First, all districts and schools are in compliance with federal, Chapter I, and state rules and regulations, and nearly all local respondents supported the rules and regulations.

• Second, in all districts and schools visited, significant curriculum change was at either the beginning or intermediate stages of implementation.

• Third, all districts and schools visited had developed procedures to align compensatory education service with their new core curriculum program.

• Fourth, nearly all local respondents were aware that the academic learning goals of the eduation system were the same for all students, that students eligible for categorical program services were expected to master the regular curriculum, and that all teachers--regular program and categorical program teachers--need to feel responsible for students' learning the curriculum program.

• Fifth, local school and district educators believe the School Improvement Program gave them sufficient leeway for tailoring the state mandated curriculum to the specific needs and context of their schools and expressed satisfaction with the requirement to align the compensatory education program to the overall school curriculum program.

• Finally, there was little if any evidence suggesting that state education reform initiatives had diluted local attention to or interests in special-needs students.

This evidence suggests that excellence and equity are not necessarily incompatible, and, in fact, are quite compatible. A mix of top-down and bottom-up tactics, regulations, and assistance mechanisms are the key to education improvement for both regular and categorical program students. These strategies seem to be grafting categorical services to the regular curriculum program, but whether the tactics improve student performance is as yet unclear.

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Policy Analysis for California Education

Policy Analysis for California Education, PACE, is a university-based research center focusing on issues of state educational policy and practice. PACE is located in the Schools of Education at the University of California, Berkeley and Stanford University. It is funded by the William and Flora Hewlett Foundation and directed jointly by James W. Guthrie and Michael W. Kirst. PACE operates satellite centers in Sacramento and Southern California. These are directed by Gerald C. Hayward (Sacramento) and Allan R. Odden (University of Southern California).

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Education Reform and Services to Poor Students: Can the Two Policies be Compatible?

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The impact of new education programs depends on implementation patterns in districts and schools, and a key issue has arisen regarding the local implementation of California's comprehensive education reforms: how do these reforms interact with the array of state and federal categorical programs for special-needs students that were designed and implemented in the equity era of the 1960s and 1970s? Behind this issue is the question of whether education reform, with its emphasis on excellence, might ignore or push aside the equity issues on which education policies were targeted from 1963 to 1983.

This paper discusses the interaction between education reform and curricular services for special-needs students--mainly economically disadvantaged students eligible for state and federal compensatory education services. The analyses are based on knowledge of California's education reforms and a California case study of changes in administrative policies and practices that resulted from the 1981 federal change in Title I of the Elementary and Secondary Education Act to Chapter I of the Education Consolidation and Improvement Act. Data were gathered during the 1985-86 school year from field interviews in three districts and nine schools and from several days at the State Department of Education.

The paper is divided into four sections. Section one discusses the evolution of knowledge about program implementation and impact, drawing heavily from research on Title I. This section includes a discussion of the difficulties of integrating program compliance and program quality issues. Section two describes California's strategies: (a) of how simultaneously to improve the quality of the regular academic program and the quality of categorical programs for special-needs students, (b) of the strategic mix of regulations to ensure redistributive program integrity and of professional autonomy to encourage local engagement, and (c) of integrating the excellence goals of education reform with the redistributive goals of categorical programs for special-needs students. Section three describes how three districts and nine schools structure compensatory and regular curriclum program services. The last section discusses how the California strategies of simultaneously improving the regular curriculum program and categorical program services are working, based on findings from the districts and schools visited.

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The Evolution of Program Implementation

Concern about interaction between current education reforms and past categorical programs for special-needs students fuses several central issues that have evolved with federal and state educational program implementation, such as:

- 1. Can top-down--i.e., higher-level government--initiatives for change work?
- 2. What rules and regulations are needed to ensure faithful implementation of key programmatic goals?
- 3. What local discretion is needed to ensure local commitment and teacher focus on substantive program elements?
- 4. What central government strategies are needed to produce high program quality?

Regulating Program Integrity

Evolution of implementation research knowledge, especially for the federal program of compensatory education--Title I of ESEA and now Chapter I of ECIA--exemplifies the above issues and the stages through which implementation realities and problems move. Research in the late 1960s, the early years of Title I implementation, generally identified the difficulties states, districts, and schools had in developing and delivering a categorical program to serve a target group of students.¹ Other research showed that unresolved political ambiguities surrounding the goals of Title I² exacerbated local implementation problems.³ As a result, the 1970s became an era of regulation development during which federal policy makers and Office of Education officials attempted to define the nature and intent of Title I through an increasingly expansive and detailed set of rules and regulations.⁴ Because it was easier to regulate items with "hard data," regulations tended to focus on fiscal issues such as targeting dollars to low-income districts, to schools with concentrations of students from low-income families, to the lowest achieving students in

¹R. Martin and Phyllis McClure, *Title I of ESEA: Is it Helping Poor Children?* (Washington Research Project of the Southern Center for Studies in Public Policy, and the NAACP Legal Defense Fund, Inc., 1969).

²For example, was it a program of general aid for urban schools or a program of special services for poor students, both of which were goals, however conflicting, of political leaders?

³Jerome T. Murphy, "Title I of ESEA: The Politics of Implementing Education Reform," *Harvard Educational Review*, 41 (1) February 1971: 35-63.

⁴Paul Sabatier and Daniel Mazmanian, "The Conditions of Effective Implementation: A Guide to Accomplishing Objectives," *Policy Analysis*, 5, Fall 1979: 385-435.

EVOLUTION OF PROGRAM IMPLEMENTATION

those schools, and to ensuring comparability of regular school services as well as the supplemental nature of compensatory education services.⁵

Research in the mid-1970s concluded that while these regulatory mechanisms had begun to put Title I back "on track," i.e., to provide extra services for low-achieving students in schools with high concentrations of poor students, there was still inconsistency in the ways rules and regulations were interpreted in the context of several state and local situations.⁶ As a result, the latter half of the 1970s witnessed attempts to solidify the intent and meaning of rules and regulations, primarily by expanding their scope and size to eliminate ambiguity.⁷

Concurrently during the 1970s, and as an additional strategy for ensuring the integrity of Title I as a supplemental program, most states (and local school districts) created separate Title I administrative units, thus producing a "picket fence" administrative structure with separate administrative units for each categorical program in addition to the administrative unit for the regular curriculum program. While these strategies had the benefit of "protecting" Title I as a focused program, they also tended to separate Title I from the regular program of the district and school, overburden it with excessive regulations, and insulate it from substantive quality concerns.⁸

By the end of the 1970s, then, concern began to emerge about obtrusiveness of the federal (and state) categorical regulatory structure, the displacement of program quality and impact by regulatory compliance, paperwork and administrative overburden, the separation of Title I from the core curriculum program, and how structures could be changed to improve program quality and impact on students.⁹ Research in the early 1980s, though, showed that, despite regulatory complexity and inconsistency both within and across major categorical programs, local districts and schools had created procedures for ensuring that dollars were spent on services for the appropriate target students, had developed mechanisms for resolving apparent federal regulatory inconsistencies, had learned how to

⁵Stephen M. Barro, "Federal Education Goals and Policy Instruments: An Assessment of the 'Strings' Attached to Categorical Grants in Education," in Michael Timpane, ed., *The Federal Interest in Financing Schooling* (Washington, DC: The Rand Corporation, 1978).

⁶Robert Goettel, et al., A Study of the Administration of the Elementary and Secondary Education Act, Title I in Eight States, Report no. TGR77-564 (Syracuse, NY: Syracuse Research Coporation, October 1977).

⁷The 1978 Title I reauthorization is a good example. See also Michael Kirst and Richard Jung, "The Utility of a Longitudinal Approach in Assessing Implementation: A Thirteen Year View of Title I, ESEA," *Educational Evaluation and Policy Analysis*, 3 (3) May-June 1981: 21-32.

⁸Alan L. Ginsburg and Brenda J. Turnbull, "Local Program Coordination: An Alternative Structure for Federal Aid to Schools," *Educational Evaluation and Policy Analysis*, 3 (3) May-June 1981: 33-42.

⁹Richard F. Elmore and Milbrey Wallin McLaughlin, "The Federal Role in Education: Learning from Experience," *Education and Urban Society*, 15 (3) May 1983: 309-330; Bea Birman and Alan Ginsburg, "The Federal Role in Elementary and Secondary Education: New Directions and Continuing Concerns," *The Urban Lawyers*, 14 (3) Summer 1982: 472-500.

process most paperwork expediently, and had decided that the benefits of having the array of state and federal categorical programs far outweighed the complexities of administering them.¹⁰

During the first 15 years of federal and state program implementation, then, answers emerged to the questions of whether top-down initiatives can work and whether a regulatory structure is needed. Central government initiatives to provide extra services to selected groups of students can work, but implementation takes time (10 to 15 years) and a clear regulatory structure is needed to ensure faithful program implementation.

Beyond Compliance to Impact

Nevertheless, the remaining and nagging issue was program quality. What had been accomplished over the first 15 years were capacities and procedures for developing programs to deliver services to targeted students with special needs. Dollars could be tracked to students, compliance with state and federal regulations could be accomplished, and audit questions could be answered satisfactorily. But the focus on administrative structure and procedure had been accomplished at the expense of attention to program substance, quality, and impact, which Title I originally had left almost completely to local discretion. For example, while most Chapter I students were "pulled-out" of regular classes to receive extra services, the effectiveness of such a program structure was questioned. In addition, curriculum in the pull-out program often was not aligned with the regular curriculum, thus requiring a Chapter I student to master two different curricula.

The goal of federal, state, and local policy makers, administrators, and teachers had been to improve Title I/Chapter I program quality while maintaining its integrity as a program of extra services for targeted students. Their dilemma was that improving program quality usually entailed a loosening of rules and regulations (or the almost complete lack of regulations on any quality issues) while ensuring program integrity usually entailed the developing of rules and regulations. Indeed, as noted above, regulations were developed during the 1970s precisely to protect Title I's integrity as a program of targeted services for low-achieving students in poor schools. Moreover, the Title I experience was mirrored by similar developments for several other state and federal categorical programs, such as those for limited-English-proficient and physically and

¹⁰Mary T. Moore, Margaret E. Goertz, and Terry W. Hartle, "Interaction of Federal and State Programs," *Education and Urban Society*, 15 (4) August 1983: 452-478. Michael S. Knapp, Marian S. Stearns, Brenda J. Turnbull, Jane L. David, and Susan M. Peterson, "Cumulative Effects at the Local Level," *Education and Urban Society*, 15 (4) August 1983: 479-499. See also Richard Jung and Michael Kirst, "Beyond Mutual Adaptation, Into the Bully Pulpit: Recent Research on the Federal Role in Education," *Educational Administration Quarterly*, 22 (3) Summer 1986: 80-109. For an analysis of how federal programs of different types function after 20 years of implementation and for the development of a new theory of federal program implementation see Paul Peterson, Barry Rabe, and Kenneth Wong, *When Federalism Works* (Washington, DC: The Brookings Institution, 1986).

mentally handicapped students. Indeed, the federal program for handicapped students was quite detailed on student diagnosis and placement and almost silent on the substance of services to be delivered.

In short, during the first 15 years of implementation research on programs for specialneeds students, the lesson learned was that some set of regulations was needed. These findings square with current political science theory that holds that redistributive government programs--of which educational categorical programs for special-needs students provide several examples--require a strong regulatory structure to maintain their redistributing nature.¹¹ Over time, redistributive programs across all functions experience political pressures to "spread" the program benefits over a wider population; tight regulations are needed to maintain the redistributive and targeted nature of the program. Thus, Title I and other categorical program administrators did not err simply by developing a set of needed regulations.

Balancing Regulation and Professional Autonomy

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The error was that regulations went beyond those needed to ensure program integrity (as one of targeted services for low-achieving students in poor schools) and into the decision-making domain of teachers delivering services to students.¹² It is not only impossible to regulate the continuous stream of decisions teachers make in determining how to deliver educational services,¹³ it is also unwise because it upsets the balance between regulation and autonomy that is needed to ensure both program integrity and program quality.¹⁴

Indeed, the state may be limited in its ability to "regulate" program quality. Elmore argues that the state should adopt a "backward mapping" perspective in addressing program quality issues.¹⁵ Backward mapping delegates the specifics of program quality decision-making authority to the level in the system where services are delivered--schools and classrooms in education. Thus, backward mapping puts teachers and school administrators in key, program quality decision-making roles and relegates other levels in the system,

¹⁴Richard Elmore and Milbrey McLaughlin, "Strategic Choice in Federal Policy: the Compliance-Assistance Trade-off," in Ann Lieberman and Milbrey Wallin McLaughlin, eds., *Policymaking in Education* (Chicago: Chicago University Press, 1981), pp. 159-194.

¹⁵Richard Elmore, "Backward Mapping: Implementation Research and Policy Decisions," *Political Science Quarterly*, 94 (4) Winter 1979-80: 601-616.

¹¹Erwin Hargrove, "The Search for Implementation Theory," in Richard J. Zeckhauser and Derek Leebaert, eds., What Role for Government? (Durham, NC: Duke University Press, 1983), pp. 280-294. See also Peterson, Rabe and Wong, When Federalism Works.

¹²Arthur Wise, Legislated Learning (Berkeley, CA: University of California Press, 1979).

¹³Richard Elmore, "Complexity and Control: What Legislators and Administrators Can Do about Implementing Public Policy," in Lee Shullman and Gary Sykes, eds., *Handbook of Teaching and Policy*, (New York: Longman, 1983), pp. 342-369.

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including state and federal levels, to a mode of assisting teachers and administrators in delivering services that reflect a state-of-the-art level of quality.

In short, Elmore argues, the state role for program quality is almost the antithesis of its role for program integrity. This, however, overstates the backward mapping case. A more balanced interpretation of Elmore's points is that there needs to be a combination of "top-down" and "bottom-up" initiatives.¹⁶ The administrative trick, of course, is to determine the appropriate mix of necessary regulations made at the top with the professional decisions made at the bottom. The trick also is to determine how the substance of programs for special-needs students relates to the regular curriculum program of the school.

Indeed, the backward mapping argument often overlooked the decline in local education program quality (the regular curriculum) that occurred in the 1970s. At times, moreover, it was used to support a relatively unfettered "bottom-up" control over program substance and quality issues. But the generic intent of backward mapping is to identify the set of effective practices that need to be implemented in classrooms and schools to deliver both good categorical and good regular educational programs, and to formulate policies that support implementation of those practices. The error in citing backward mapping to justify an unfettered bottom-up approach is that during the 1960s and 1970s central governments had delegated the content and character of educational program quality to the local level, but quality had eroded from the regular curriculum program and had never been firmly developed for most categorical programs.

Merging Equity and Excellence Issues

Implementation research at the close of the 1970s had not yet answered the questions of what types of local discretion were needed to ensure teacher engagement on subtantive program issues nor of what more was needed to produce good program quality--either for categorical programs or for the regular education program. The education excellence movement emerged in 1983 precisely to focus on such education quality issues.

The irony, then, behind the concern that the education excellence movement might derail education equity programs, such as Title I/Chapter I, is that the dilemma for education equity programs was precisely the issue addressed by the excellence movement: how to improve the quality of local school programs and the performance of students. Thus, the issues that were joined at the onset of the education reform movement were how

¹⁶Elmore and McLaughlin, "Strategic Choice in Federal Policy." See also William Lowe Boyd, "Policy Analysis, Educational Policy and Management: Through a Glass Darkly?" in Norman J. Boyan, ed., *The Handbook of Research on Educational Administration* (New York: Longman, forthcoming).

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to improve the regular education program of the local education system and how to improve the quality of extra services provided to special-needs students (since their integrity as targeted programs had been resolved by regulations).

While the data analyzed in this study were collected for the purpose of assessing changes in Chapter I (or compensatory education) administrative policies and practices as part of a nationwide, Congressionally mandated study, the study also gathered data on the major purposes of California's education reform program and its strategies of linking the delivery of categorical services to the education reform agenda. Thus, the study also addressed the issues of program quality and regulatory compliance in the objects of state categorical program administration. Since data for the study were collected during the 1985-86 school year, the third year implementation of California's 1983 comprehensive reform program, the data also include information on both the impact of education reform locally and its interaction with the administration and delivery of compensatory education program services.

The California Strategy

Over the past 15 years, California has adopted a relatively complex set of strategies that include a heavy dose of both top-down regulation and bottom-up program quality improvement components, targeted on both categorical programs and the regular curriculum program. Indeed, there has been a shift from state to local control over planning and monitoring, a shift coinciding with recent education reform initiatives. While the Congressionally mandated study of Chapter I administrative policies and practices found that states tended either to focus on compliance or quality issues in Chapter I (or compensatory education) administration,¹⁷ California has mixed both an extensive compliance and rich program improvement orientation.

First, California has a full set of state categorical programs for special-needs students, many of which were enacted before similar federal programs. Approximately 20 percent of 1985-86 public K-12 education revenues (\$3.4 billion of \$17 billion) were provided for categorical programs. The Economic Impact Aid Program, which includes both a state compensatory education (SCE) and limited-English-proficient student component, totaled close to \$200 million, with \$100 million for compensatory education. The federal Chapter I grant for California was approximately \$300 million.

Second, key regulations for the compensatory education component of Economic Impact Aid parallel those for Chapter I including targeting schools and students, supplement not supplant, definition of "greatest need," comparability (until eliminated by

¹⁷Eleanor Farrar and Mary Ann Millsap, State and Local Administration of Chapter I (Cambridge, MA: Abt Associates, 1986).

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Chapter I), fiscal audits, and compliance monitoring. The size, scope, and quality regulations, i.e., those regulations addressing program quality, are, as Chapter I, silent on the substance of program quality per se. The multiplicity of special-needs programs and the strong regulatory structure reflect California's historic concern for students with special needs. Both the set of categorical programs and their regulatory structure, then, reflect implementation research conclusions that extra services for special-needs students require special program structures and attendant rules and regulations, both initiated by a government above the local district.

Local Initiatives Through the School Improvement Program

Prior to the 1983 education reform initiatives, California also had created a bottom-up program focused on program quality improvement. California's 14-year old School Improvement Program (SI), funded at \$225 million in 1986-87, provides about \$100 per pupil to local schools for the purpose of engaging in local education improvement initiatives. About 90 percent of districts and 50 percent of all schools participate in the program.

School Improvement requires the creation of a school site council comprised of parents, teachers, administrators, and students in high schools, which *governs* school use of SI funds. Schools need to engage in a data collection and analysis process to identify issues as the foci for SI activities. There must be a written SI plan; an evaluation of the implementation and impact of the plan, called a program quality review, is conducted every three years by individuals external to the school and district. This program and its generous funding reflect California's historic recognition of the need for "bottom-up" education improvement initiatives,¹⁸ and is working quite well.¹⁹ Its major weakness prior to 1983 was the lack of attention to curriculum and instruction in most site-level education improvement plans.²⁰

Four additional and relatively recent initiatives complete the list of strategies California now employs for program quality and redistributive program integrity. These include omnibus reform legislation, administrative and management reform within the State Department of Education, and major changes in the administration of federal and state categorical programs.

¹⁸Allan Odden, "California State Case Study," analysis of state level fieldwork conducted for the Education Commission of the States' study of state strategies supporting local school improvement, July 1984.

¹⁹Allan Odden and Beverly Anderson, "How Successful State Education Improvement Programs Work," *Phi Delta Kappan*, 67 (8) 1986: 582-585.

²⁰Paul Berman and Tom Gjelten, *Improving School Improvement*, Vol. 2 (Berkeley, CA: Berman, Weiler Associates, 1984).

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State Initiatives Through Omnibus School Reform Legislation

Senate Bill 813, California's comprehensive education reform, was enacted in July 1983. This reform was designed specifically to improve California's overall education system. One of its hallmarks is its attention to curriculum improvement.

Indeed, a central element of SB 813 is the definition of a core curriculum program for all students and the complementary set of mechanisms designed to ensure that the core curriculum is delivered to all students. SB 813 mandated minimum high school graduation requirements.²¹ It required the State Department of Education to develop model curriculum standards in several areas, and standards, generally acknowledged to represent state-of-theart thinking in mathematics, science, history, and fine arts, have been developed. It required changes in guidelines for textbook adoptions; the state requires new texts to be substantively sound and to emphasize analytic thinking skills. The controversy surrounding the adoption of new science textbooks in the fall of 1985 and the rejection of nearly all mathematics materials in 1986 reflect this emphasis. SB 813 also established several regional curriculum implementation centers across the state to help local educators implement the new curriculum.

Further, SB 813 created 11 Administrator Training Centers and charged them with training current and aspiring principals in the substance needed to provide curriculum and instructional leadership in schools. SB 813 also revised and expanded the state testing program, increasing the number of subjects tested (to include mathematics, reading, social studies, and science) and the number of grades at which tests will be administered, and deepened the content of the tests to reduce factual recall and emphasize application of knowledge, critical thinking, and analytic skills.

In short, SB 813 was initiated by the state to focus attention on curriculum and instruction (the core of what would define program quality), and included several interconnected elements designed to improve the central, academic curriculum of the education program. The idea, moreover, was that all students needed to master the core curriculum program, and that mastery was a reasonable goal for regular students as well as students in special-needs, categorical programs, including students in compensatory education programs.²²

²¹Three years of English, 2 years of mathematics, 2 years of science, 3 years of social studies, 2 years of physical education, and 1 year of either foreign language or fine arts.

²²Bill Honig, Last Chance for Our Children (Reading, MA: Addison-Wesley, 1985).

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Leveraging Local Change Through Program Quality Review

After SB 813 came revision of the SI program quality review document, a document key to the functioning of local school SI activities. Local respondents in two major studies identified the program quality review document as having a critical influence on the shape of the local program²³ because it was the document that structured the three-year evaluation. Thus, revision of the document offered significant leverage for changing local SI activities. The state changed both the *nature* of the program quality review to reflect greater emphasis on curriculum and the *responsibility* for program review by shifting it to the local level.

Prior to 1983, the program quality review document required detailed information on how SI affected individual categorical programs, such as compensatory, bilingual, and special education programs, and left the substantive focus of SI entirely to local discretion. As a result, most schools focused on issues other than improving the core curriculum program.²⁴ In 1984 and 1985, the program quality review document was completely revised around two driving objectives: first, that SI should focus on curriculum change as the core of education improvement, and, second, in part as a result, that SI could be reconceptualized as a major implementation vehicle for SB 813.

Thus, the new program quality review document highlights curriculum as the key issues on which evaluation should focus and includes separate sections on reading, mathematics, science, English, and history. Rather than highlighting categorical programs as separate entities, the document includes an overall section on categorical programs and requires local schools to demonstrate how they structure categorical programs to help Chapter I-eligible students learn the regular, core academic curriculum. In short, the new document identifies curriculum improvement as the central component of any SI activity, thus specifying the substance of local SI plans, and seeks to restructure categorical programs to help core curriculum program, thus integrating the focus of categorical program services with the regular education program.

In addition, California eliminated the state role in both SI plan review and program quality monitoring. Today, only central office district staff review individual school SI plans, and the review is mainly for compliance with rules and regulations. Further, consortia of local educators perform the program quality review function, whereas state department staff conducted it for the first 12 years of the program. Both of these changes

²³Berman and Gjelten, *Improving School Improvement*; Allan Odden, "California Local Analytic Memorandum," prepared for the Education Commission of the States' study supporting local school improvement, February 1984.

²⁴Berman and Gjelten, Improving School Improvement.

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remove the state from any detailed involvement in local program quality issues. In other words, California has structured the content of the core curriculum program through state law and regulation but has delegated authority for designing, implementing, and evaluating program quality to the local school and district level.

Toward Local Compliance Monitoring

The consolidated application form was developed in the late 1970s to address the issue of rising regulatory and paperwork overburden for local categorical program administration. The consolidated application form merged the application procedure for several large categorical programs, including both state and federal compensatory education programs, and reduced the data required for submission to the state. During the past three years, moreover, the state has automated large portions of data needed for the application and now sends the application to districts with the bulk of the form already completed; districts need only check for accuracy and make marginal changes. The state is piloting a consolidated application form for all 79 federal and state categorical programs. In addition, the state has eliminated requirements for submission of detailed SI and Chapter I plans to the state. These changes, combined with elimination of both state review of SI plans and involvement in program quality reviews, allowed the state to reduce by 50 FTE the number of staff in compliance monitoring. These changes also have significantly reduced administrative and paperwork overburden in the local administration of federal and state categorical programs.

Coordinating Compliance Review

Finally, the state is implementing a major change in compliance monitoring of federal and state categorical programs. The separate compliance monitoring units that had been part of each separate categorical administrative unit have been abolished and a new unit, that will conduct the monitoring function for nearly all categorical programs, has been created. The new Coordinated Compliance Review (CCR) is a system in which all consolidated applications programs as well as child development, gifted and talented, migrant education, special education, vocational education, and adult education are monitored *simultaneously* for compliance once every three years. The state developed a 200-page CCR manual which identified key elements in law, regulation, and U.S. Office of Civil Rights requirements which would be reviewed in local CCR visits and the tests that would be made for each element. The new manual eliminates several unproductive items that had crept into previous monitoring procedures, so the new CCR process not only coordinates local compliance reviews but also streamlines them to include only required issues.

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CCR also strongly suggests that local administrators conduct a self review before the arrival of the state monitoring team. Many districts have responded. This procedure helps to make the state review a more collegial activity, with the focus on identifying strategies both for resolving problem areas and for determining how to integrate services funded from several programs in ways that respect the local need to deliver coherent services in a high-quality manner and state needs to ensure regulatory compliance.

The integrated program element of CCR specifically requires local districts to describe how they link categorical program services to the regular, core curriculum program. The integrated program element requires local districts to ensure that services provided by categorical programs are designed to reinforce learning of the regular curriculum and requires materials purchased with categorical funds to be aligned with and supplementary to the texts and materials used for the regular curriculum. The intent is to eliminate the separate curricula that had been part of categorical programs in the past and to emphasize the goal of categorical programs as reinforcing the core academic program. The integrated program element also requires local districts to define the base academic program and to verify that categorical services are provided on top of the base, i.e., as supplemental services.

A Strategic Mix of Compliance and Assistance Mechanisms

Taken in combination, these developments are designed to increase local capacity and leeway for reconciling and integrating the demands of education reform and categorical program reform. There are several facets of these state policies that should be underscored in thinking analytically (and strategically) about how they address the issues outlined at the beginning of this paper.

First, California is attempting to address several issues simultaneously: improving the core curriculum program, improving the quality of categorical program services, ensuring the integrity of the targeted and redistributive nature of categorical programs, and streamlining and reducing administrative and paperwork overburden. Second, California's strategies are integrated and interrelated by design; rules and regulations for categorical programs have been modified to "force" the alignment and fusion of categorical and regular program services, and the multiple strategies for improving the core curriculum seek to align curricular objectives, curricular guides, textbooks, and texts. Third, California has adopted a rich mix of strategies that include both top-down and bottom-up components, with several dimensions hitherto untried in any state.

The state drew upon several lessons from the 1970s to produce the current array of strategies:

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• Regulatory overburden is not solved simply by loosening or eliminating regulations, or by switching from categorical to block grants. Thus, unlike the federal government which loosened regulations in Chapter I and transformed several categorical grants into the Chapter II block grant, California maintained its array of categorical programs but streamlined the regulatory structure to key issues and elements.

• Program quality also is not solved simply by diluting regulations or just by letting local educators identify education improvement goals. Thus, California both added regulations and mandates to define the core academic program for all students and required that this curriculum be the major focus of local school improvement agendas.

• Substantially sound categorical program services are not resolved just by altering components within the categorical program because categorical program quality depends primarily on the core curriculum program, which had been ignored or forgotten for over a decade and had deterioriated in substance and quality. Thus, California designed its education reform to improve the core curriculum program and then changed categorical program regulations to ensure that categorical educational services were aligned with and designed to support students' learning the regular curriculum.

In short, California has adopted strategies that: (1) fuse categorical program curriculum with the core academic curriculum; (2) include top-down mandates for (a) the structure of the core curriculum program, (b) the content for school site education improvement, and (c) the targeted and redistributive nature of catgegorical programs including compensatory education programs; and (3) place responsibility for the details of program quality design, implementation, and evaluation in the hands of local school and district educators. These initiatives represent a strategic mix of compliance and assistance mechanisms and of top-down and bottom-up mechanisms, and, finally, retrieve categorical program services from the periphery of the regular school program and integrate them fully and directly into the core of schools. Both the mix of strategies and their interconnectedness is relatively unique across the 50 states.

The California Strategies as Implemented in Districts and Schools

Three districts and nine of their schools selected at random on a stratified basis were studied to determine how these state policies actually were implemented: a large, urban district with over 100,000 students, a medium sized, rural district with almost 20,000 students, and a small, suburban district with 4,000 students. The study used a detailed quantitative and qualitative case study outline that prescribed types of information needed at the state, district, and school level. Data were collected by a research team of two persons at three different time periods over the 1985-86 school year and included 12 days of field

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data collection: four days at the state level, three days in the large and medium districts, and two days in the small district. Approximately 15 people in the State Department of Education were interviewed, from the deputy superintendent to Coordinated Compliance Review monitors. In each district, key central office Chapter I and curriculum and instruction staff were interviewed. At each school, the principal, assistant principal(s), Chapter I coordinator, and Chapter I as well as several other teachers were interviewed. Documentary data also were gathered and reviewed. Detailed case studies of the state, each local district and each school were produced as internal case studies for the Chapter I study.²⁵

Implementation in a Large, Urban District

In the large district, which was 51 percent minority and one-fourth Chapter I-eligible, the central office had developed a strong, core curriculum program (closely aligned with state curriculum standards and frameworks) in all basic subjects for both elementary and secondary levels. The prevailing philosophy was that all students, including Chapter I students, should be exposed to and learn the core curriculum and that categorical program services, such as those funded by Chapter I, should be designed to reinforce and support the learning of that core curriculum. Central office curriculum themes were academic rigor, curriculum alignment (of curriculum content, texts, and tests), and core curriculum for all students.

Chapter I-eligible students were those students scoring below the 50th percentile on a standardized achievement test, and all eligible students were served. The district urged schools to hire certified teachers instead of classroom aides with categorical funds but did not strongly enforce this suggestion since most teacher aides were either part-time, fully certified teachers or university students in teacher training programs.

The central office was strongly equity oriented, actively suporting compliance with all Chapter I rules and regulations, reorganizing the district into four areas, each of which included a similar portion of low, middle, and high SES schools, and faithfully implementing a strong desegregation court mandate. The court mandate had, moreover, spawned a curriculum reform prior to the new state curriculum emphasis; the desegregation reform emphasized student achievement of basic skills through a structured program based on mastery learning, direct instruction, and time-on-task research. This program, used in most Chapter I schools, included clear curriculum scopes and sequences, specific initial teaching strategies, and alternative teaching strategies for students not successfully learning the objectives from the initial teaching.

²⁵For additional details, see Allan Odden and Tyson Reyes, "California Case Outline" and "Local District Case Outline 1, 2 and 3," local fieldwork and analysis for the Abt Chapter I study.

IMPLEMENTATION IN DISTRICTS AND SCHOOLS

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The three schools studied in this district, two of which were 100 percent Chapter Ieligible and one of which was 60 percent Chapter I-eligible, were all actively implementing the district's core curriculum program and/or the desegregation-mandated curriculum. In all schools, both administration and faculty emphasized Chapter I services as reinforcing the learning of the regular school curriculum program and used a combination of certified, resource teachers for pull-out, small-group intensive work and in-class aides (most being part-time, certified teachers or university students) for individual tutoring during regular seatwork. While the schools focused Chapter I services on mathematics, reading, and language arts, the philosophy at all three schools was that all students should be exposed to a broad, core curriculum and expected to learn it.

Implementation in a Rural Setting

The medium sized, rural district administered the Chapter I and School Improvement programs in a curriculum and instruction division that included general curriculum staff, staff development, and categorical programs; the district signal was that these three components of the local education program were inextricably linked. The district had a particularly strong staff development program in clinical teaching, supervision of clininal teaching, and the Bay Area writing program. The central office curriculum themes were instructional improvement, academic rigor, a sound core curriculum program, and increased high school graduation requirements.

Three years prior to SB 813, the district had developed districtwide, K-12 curriculum scopes and sequences which all schools were expected to implement and which all students were expected to master. There was ongoing work on aligning curriculum content with texts and tests. The district linked Chapter I to School Improvement; the message was to use SI to implement the district's core curiculum and to design Chapter I programs to supplement the core. Students scoring below the 50th percentile were potentially eligible for Chapter I service; the goal was to serve all students. If funding was insufficient to meet that goal, the district policy was to reduce the cutoff score to ensure service to the lowest achieving students.

Following state advisories, the central office suggested that decreased use of teacher aids and increased use of certified teachers was the preferred structure for staff use of Chapter I funds. The district was very serious about complying with Chapter I rules and regulations and was organized and diligent in ensuring a compliant Chapter I program design, at both district and school levels. The superintendent was a strong supporter of programs for special-needs students, especially Chapter I, and developed mechanisms to make sure education reform implementation in the district did not disadvantage specialneeds students.

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The three schools studied in this district also echoed the themes of curriculum alignment and core curriculum for all students. In all schools, administrators and teachers articulated a Chapter I philosophy of extra services to help students learn the regular, core curriculum program; at no school was there a separate curriculum for Chapter I students. In all schools, Chapter I services helped students learn curriculum objectives presented by the regular teacher. One school used certified teachers to work individually within the classroom with Chapter I students during regular seatwork. Another school used teacher aides to provide within-classroom tutorial services, but most of the aides were certified teachers. The middle school had developed reading and writing laboratories for Chapter I students; at district expense, all students needing remedial mathematics or reading were provided instruction by a specialist in a small class of 15 students. Twelve such classes were funded. In one school, Chapter I students were those scoring below the 25th percentile, in another the cutoff was the bottom third.

Schools, thus, sought to serve the most needy students. The middle school, moreover, expanded Chapter I services beyond reading, mathematics, and language arts into social studies, science, vocational education, and expository writing. All schools, moreover, were very conscious of rules and regulations and worked to maintain the integrity of Chapter I as a targeted program of services for a small group of students.

Implementation in Suburbia

The small, suburban district was located in a relatively affluent and very conservative community, yet here, too, equity concerns were strong. The new superintendent had changed all school attendance boundaries to ensure a balanced economic and racial mix at all schools in the district. In addition, the district had decided to provide Chapter I services only to students in grades 3-8, since those were the grades with the largest number of students scoring in the bottom quartile on a standardized achievement test. This district also was actively involved in implementing a revised curriculum and instruction program: K-12 curriculum scopes and sequences had been developed and aligned with new districtwide textbooks and both district and state tests; the district was actively implementing a program of clinical teaching, clinical supervision, and higher-level-thinking-skills staff training program; and School Improvement was being used as an implementation vehicle for both the new curriculum program and Chapter I services.

The themes of a sound, core regular curriculum program for all students, with categorical services reinforcing and supporting the core again was echoed. During the past three years, moreover, the district had eliminated all teacher aides for all categorical programs and replaced them with fully certified, resource teachers. Chapter I was administered at the central office by two people who were relatively new to the district and

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who had been hired to "clean up" the district's categorical program structure and administration, further evidence of a strong equity orientation even in this conservative community. Finally, the central office Chapter I coordinator monitored the academic and social progress of each Chapter I-eligible student every 20 days to ensure good program implementation and identification of emerging problems.

Are the Strategies Changing Education Delivery, Especially for Poor Students?

This data from local fieldwork provided encouraging evidence that the strategies seemed to be taking hold *at the school level* including the intended effects on students receiving compensatory education services.

First, all districts and schools are in compliance with federal, Chapter I, and state rules and regulations, and nearly all local respondents supported the rules and regulations.

Second, in all districts and schools that were visited, major curriculum change was at either the beginning or intermediate stages of implementation. One district had begun to implement a more academic curriculum program before California's education reform; the reform intensified the effort. The other two districts began their curriculum reform efforts after SB 813 was enacted. One district was developing a K-12 scope and sequence for the entire academic curriculum, including aligning texts and tests with the new program. One high school, with more than a 50 percent Chapter I student enrollment, was planning to implement the new state curriculum standards beginning in 1986-87, and would be one of the first high schools in the state to do so. In short, curriculum reform was taking hold in a substantial way in all districts and schools visited.²⁶

Third, all districts and schools visited had developed procedures to align compensatory education services with their new core curriculum program. One district had developed teaching and reteaching sequences in which the reteaching components used a different teaching strategy but for the same curriculum objectives: the goal was to have the student learn the core curriculum. If mastery was not learned in the first round of teaching, a new teaching strategy was used but for the same curriculum content objective. Another district had drawn a tree showing the trunk as the core curriculum and the branches--supported and fed by the trunk--as categorical programs. In all districts, central office staff needed to

²⁶See also Pam Grossman, Michael W. Kirst, Worku Negash, and Jackie Schmidt-Posner, *Curricular Change in California Comprehensive High Schools: 1982-83 to 1984-85* (Berkeley, CA: Policy Analysis for California Education, PACE, July 1985). Ffor a more comprehensive report concluding that California's education reforms seem to be on track see James W. Guthrie and Michael W. Kirst, eds., *Conditions of Education in California: 1986-87* (Berkeley, CA: Policy Analysis for California Education, PACE, October 1986).

approve materials purchased with categorical funds; the programmatic test for approval was whether the materials were aligned with and appropriate for the objectives and texts used for the regular curriculum program.

Fourth, nearly all local respondents were aware that the academic learning goals of the education system were the same for all students, that students eligible for categorical program services were expected to master the regular curriculum, and that all teachers--the regular teacher and the categorical program teacher--needed to feel responsible for students' learning the curriculum program. In other words, the linkage between the regular school program and categorical education services had begun to unify the expectations for all students and to broaden the responsibility for compensatory education student learning to all teachers in the school. Not only were the Chapter I-supported teachers responsible for Chapter I student performance, but so also were the regular teachers. Indeed, all districts had placed primary responsibility for categorical program students' learning on the shoulders of the regular teachers, not the teachers supported by categorical funds.

Fifth, local school and district educators believed SI gave them sufficient leeway for tailoring the state-mandated curriculum to the specific needs and context of their schools and expressed satisfaction with the requirement to align the compensatory education program to the overall school curriculum program. In addition, local respondents expressed satisfaction with curriculum improvement as the key element of local school improvement plans: "What else would it be?" they queried when asked if the state's fixing the substance of improvement was too confining. The combinaton of top-down broad curriculum definition and bottom-up specific curriculum implementation seemed to be working, for regular as well as compensatory education students.

Finally, there was little if any evidence suggesting that state education reform initiatives had diluted local attention to or interest in special-needs students. All three districts and nearly all nine schools identified several recent and key initiatives to strengthen services for compensatory education students. One district had completely reorganized school attendance boundaries to produce a more balanced socio-economic mix in its schools in order to halt a growing concentration of poor students in two schools. Another district had developed a set of teaching strategies that were particularly effective in improving the academic achievement of poor and minority students. Another district had changed the way they used compensatory education funds, switching from spending dollars on classroom aids to spending them on resource teachers, staff development in effective teaching, and a variety of effective school strategies.²⁷

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²⁷This strategy effectively contends that improving the overall school program is more effective than improving just isolated categorical services. Research suggests it is a powerful strategy. See the series of articles in *Elementary School Journal*, 87 (2) November 1986 on the Napa Valley, Madeline Hunter follow-through training program.

CONCLUSION

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Clearly, more research needs to be conducted on the implementation and impact of California's education reform initiatives to determine whether they actually improve local program quality over the long term. More research needs to be conducted to determine whether special-needs students actually learn the new core curriculum. The above results, though, indicate that California is at least trying to link education reform with categorical program improvement and that a change in delivery of categorical program services was evidenced in the three districts studied.

Conclusion

California's strategies for addressing the quality of educational programs and services by integrating education reform and programs for special populations suggest that excellence and equity are not necessarily incompatible, and, in fact, are quite interrelated. The strategies assert that a mix of both top-down and bottom-up tactics, regulations, and assistance mechanisms are the key to education improvement for both regular and categorical program eligible students. Preliminary evidence suggests the strategies seem to be working, at least in terms of grafting categorical services to the regular curriculum program. Whether the tactics improve student performance, however, is as yet unclear. Final conclusions, however, should be based on more comprehensive research both on the effect of California's education reform and the performance of students in special-needs programs.