

February 22, 2024

Dr. Michelle Daley, Group Leader
Program and Grantee Support Services
U.S. Department of Education, OESE
400 Maryland Ave. S.W.
Washington, DC 20202

Re: Proposed Priorities, Requirements, Definitions, and Selection Criteria—Comprehensive Centers Program ([Docket ID ED–2023–OESE–0209](#))

The undersigned education equity advocacy organizations are pleased to submit comments in response to the Department of Education’s notice of proposed priorities for the FY24 Comprehensive Centers Program competition. We submit these comments as a collaboration of national organizations seeking to advance shared education equity priorities through federal, state, and local policy and advocacy.

We support the Department’s proposal to use a combination of a National Comprehensive Center, Regional Centers, and four Content Centers to help meet the needs of state, local, regional, and tribal education agencies to improve instruction and outcomes for students. In particular, we believe the proposed Fiscal Equity Comprehensive Center is an important move to help address very challenging long-standing as well as new and emerging issues with helping states and districts improve equity and transparency in school funding.

We appreciate that the proposed priorities for the National Comprehensive, Regional, and Content Centers highlight the importance of improving outcomes for students in schools that are implementing comprehensive support and improvement (CSI) or targeted or additional targeted support and improvement activities (TSI and ATSI) under section 1111(d) of the Elementary and Secondary Education Act (ESEA). **However, it is not enough to merely signal the importance of conducting activities that support identified schools and the students they serve. The priorities for the National Comprehensive Center and Regional Centers should require that proposals include specific plans to address the most widespread challenges that state education agencies (SEAs) and local education agencies (LEAs) are facing in identifying and addressing resource inequities in identified schools, and in developing and implementing school improvement activities more broadly.**

School improvement and resource allocation review processes are foundational to the Comprehensive Centers Program’s goal of improving educational outcomes, closing achievement gaps, and improving the quality of instruction. Those processes require needs assessments and holistic reviews of resources that are best suited to be addressed through the National Comprehensive Center and Regional Centers, but the Content Centers—particularly the proposed Fiscal Equity Content Center—should also be utilized, as needed, to help identify best practices and answer emerging questions aligned with the topics covered by each Content Center. For example, because reviewing equity in spending is an important component of resource allocation reviews, the Fiscal Equity Content Center should be tapped to support the National and Regional Comprehensive Centers in their work with fiscal equity

components of the broader resource equity audits and resource allocation reviews required by the ESEA.

Considering the [recent report](#) from the Government Accountability Office (GAO) that found widespread noncompliance regarding SEAs' school improvement activities and the Department of Education's failure to monitor those SEA activities, we believe that the Comprehensive Centers Program priorities should reflect a much stronger focus on providing technical assistance to SEAs and LEAs to comply with the school improvement activities required by the ESEA. We appreciate the Department's [July 2023 Dear Colleague Letter](#) on identifying and addressing resource inequities and using evidence-based interventions. However, given the GAO's findings of noncompliance regarding the inclusion of needs assessments, evidence-based interventions, and identifying resource inequities in improvement plans, SEAs and LEAs need more support to implement ESEA school improvement requirements – both in terms of the broad school improvement process and, specifically, with regard to resource allocation reviews. SEAs and LEAs also need technical assistance to ensure adequate and equitable funding is available to schools identified for improvement to carry out improvement activities.

Improving the Whole School Improvement Process

The GAO study found that only 42% of CSI plans were based on a needs assessment, identified resource inequities, and included evidence-based interventions. This does not mean the plans did these things well or that implementation was successful – just that these three elements were included in the plan. In other words, at most, only four out of ten CSI school plans should be considered meeting the basic set of requirements of section 1111(d) of the ESEA. This is clear evidence that SEAs and LEAs need more support to develop more comprehensive school improvement processes. The proposed priorities make clear that the Comprehensive Centers must support SEAs and LEAs with identifying evidence-based interventions, but that is just one component of the school improvement process. A complete and coherent [process](#) includes diagnosing the most critical challenges identified schools face through a needs assessment, including identifying resource inequities the plan should correct; selecting appropriate evidence-based strategies and interventions to address the challenges and implementing the strategies with fidelity; and monitoring progress, and intensifying action, if goals are not being met.

- **Recommendation:** Add additional detail to Proposed Priority 1 for the National Comprehensive Center to support implementation of school improvement activities referenced in ESEA section 1111(d).

(2) Implement and scale up evidence-based programs, practices, and interventions that lead to the increased capacity of SEAs and LEAs to address the unique educational challenges and improve outcomes of schools implementing comprehensive support and improvement activities or targeted or additional targeted support and improvement activities as referenced in Title I, Part A of the ESEA (ESEA sec. 1111(d)) and their students, to include:

- diagnosing the most critical challenges in identified schools, including consistently reviewing resource inequities, with a needs assessment,
- identifying and implementing evidence-based strategies and interventions to address the challenges, and
- monitoring progress and taking corrective action as needed

Better Resource Allocation Reviews

The GAO study found that only 52% of plans identified resource inequities, the most commonly missing CSI plan element of the three examined. Further, only 13% of plans evaluated whether district or school funding was equitably distributed. **Most concerning is that some plans instead evaluated problems that school, district, and state leaders have limited control over – such as students experiencing homelessness.** SEA and LEA staff need more concrete technical assistance and capacity building to understand how to identify resource inequities in CSI plans. This includes (a) identifying which resources are both within the locus of control of education decision-makers and have been shown to influence student outcomes – especially for the students who are underserved by the school and (b) sharing best practices for examining the distribution of those resources, with a focus on identifying patterns that shortchange students of color, students from low-income backgrounds, multilingual learners, and students with disabilities. If CSI plans, which are approved by SEAs, at best often fail to identify resource inequities that can be influenced by education leaders and, at worst, do not even examine resource inequities, we are also concerned that SEAs lack the capacity to complete effective resource allocation reviews among LEAs with significant numbers of schools identified for CSI, ATSI, and TSI. Further, in 2022 and 2023, all of the SEAs for which ED conducted [performance monitoring](#) of Title I, Part A requirements were found to be noncompliant with this requirement.

- **Recommendation:** Revise one of the services included in Proposed Priority 1 for the National Comprehensive Center to ensure that plans support SEAs to implement resource allocation reviews.

(3) Implement State accountability and assessment systems consistent with Title I, Part A of the ESEA (ESEA section 1111(b)–(d)), [including the requirement for States to conduct resource allocation reviews required by ESEA section 1111\(d\)\(3\)\(A\)\(ii\) in a consistent manner and aligned with the U.S. Department of Education’s Dear Colleague Letter dated July 11, 2023 on State Resource Allocation Review and Identifying and Addressing Resource Inequities in CSI and ATSI Plans](#);

- **Recommendation:** Revise one of the services included in Proposed Priority 2 for the Regional Comprehensive Centers to ensure that plans support SEAs to implement resource allocation reviews.

(1) Carrying out Consolidated State Plans (approved under the ESEA, with preference given to the implementation and scaling up of evidence-based programs, practices, and interventions that directly benefit recipients that have high percentages or numbers of students from low-income families as referenced in Title I, Part A of the ESEA (ESEA sec. 1113(a)(5)) and recipients that are implementing comprehensive support and improvement activities or targeted or additional targeted support and improvement activities as referenced in Title I, Part A of the ESEA (ESEA sec. 1111(d)), [including the requirement for States to implement resource allocation reviews consistent with ESEA section 1111\(d\)\(3\)\(A\)\(ii\) and aligned with the U.S. Department of Education’s Dear Colleague Letter dated July 11, 2023 on State Resource Allocation Review and Identifying and Addressing Resource Inequities in CSI and ATSI Plans](#);

- **Recommendation:** Revise one of the services within Proposed Priority 2 to ensure the Regional Centers support SEAs and LEAs to address corrective actions from Title I, Part A program monitoring.

(4) Improving implementation of ESEA programs by addressing corrective actions or results from audit findings and ESEA program monitoring, conducted by the Department, that are programmatic in nature, at the request of the client, at the request of the Department of Education, or based on recommendation by the Regional Center.

Ensuring Fiscal Equity Considers the Unique Needs of Identified Schools

In addition to the lack of capacity among school, LEA, and SEA leaders to implement school improvement activities revealed by the GAO, new data from [All4Ed](#) show that an alarming share of identified schools are spending significantly less per pupil following their identification for CSI, ATSI or TSI, despite the availability of federal funds for such purposes under section 1003 of the ESEA. While many of these schools were spending less from federal sources, declines in per pupil spending were more often driven by changes in spending from state and local sources, according to the analysis.

- **Recommendation:** Update the proposed priorities of the new Center on Fiscal Equity to also include a focus on ensuring adequate and equitable school funding strategies for schools identified for support and improvement.

(3) Fiscal Equity: The Center on Fiscal Equity must provide universal, targeted, and, as appropriate and in partnership with Regional Centers, intensive capacity-building services designed to support SEAs and LEAs in strengthening equitable and adequate school funding strategies, including the allocation of State and local funding; improving the quality and transparency of fiscal data at the school level; and prioritizing supports for students and communities with the greatest need, including schools implementing comprehensive, targeted, and additional targeted support and improvement plans under ESEA section 1111(d). The Center must support the selection, implementation, and scale-up of evidence-based programs, policies, and practices that promote responsible fiscal planning and management and effective and permissible uses of ESEA formula funds, including through combining those funds with other available and allowable Federal, State, and local funds (“blending and braiding”) and considering how ESEA funds may interact with and complement other Federal programs, such as IDEA, Medicaid, and Head Start to improve student opportunities and outcomes.

Thank you again for the opportunity to provide feedback on these proposed changes to the Comprehensive Centers Program, and for your commitment to building the capacity of state, local, and school leaders to improve educational experiences and outcomes for students – especially those who are underserved.

Sincerely,

All4Ed

Education Reform Now

National Center for Learning Disabilities

The Education Trust