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Pacific Resources for Education and Learning

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Comprehensive School Reform Demonstration Program: The Third Wave and Its Preliminary Effects

By Mary B. Church, Ph.D.*

third wave of school reform has crested in the United States and arrived on the shores of our Pacific region. The first wave occurred in the 1980s and was directed at forestalling the U.S. educational crisis described in "A Nation At Risk" (National Commission on Excellence in Education, 1983). This reform movement was initiated by governmental mandate and resulted in increased teacher salaries, core-subject requirements, and an expanded academic calendar. The second wave of reform focused less on the systemic features of education and more on its providers (Darling-Hammond, 1997). This led to improved teaching conditions, with greater emphasis on professional development and teacher retention.

Innovations resulting from the first two waves of school reform did not, however, result in a reorganization of the schools or a transformation of teaching practices. The foundation of education—curricula and instructional practice—was left unchanged while important educational support structures were bolstered.

Unlike the first two reform movements, which targeted specific elements of the education system, the third is directed at the system itself, with special focus on schools with large populations of disadvantaged students. The Comprehensive School Reform Demonstration (CSRD) Program attempts to affect change in all aspects of low-performing (e.g., Title I) schools by creating a swell, rather than a ripple, of influence. CSRD is a federal educational initiative intended to improve student achievement by reorganizing schools.

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Research on Effective Schools

CSRD asks educators to redesign curriculum and instruction by incorporating in schools features established by research to result in effective instructional practices. Research shows that high-poverty schools—those most at risk for educational underachievement—engender high student academic performance when characterized by the following features:

- attainable and ambitious goals for students,
- a focus on student issues, rather than those of the faculty and administration,
- a sense of collective responsibility for student behavior and learning,
- the effective use of data in decision making,
- a focus on instruction,
- increased instructional time,
- standards-based curricula,
- time dedicated to teacher collaboration (U.S. Department of Education, 1999).

CSRD creates a society-large education experiment in which schools with low-performing students are offered incentives to initiate programs found by empirical research to be effective. Schools select or develop a research-based program of instruction, the effects of which are observed empirically at the federal, state, and local levels.

The purpose of this paper is to inform the reader about CSRD and its application and evaluation in the Pacific region. While it is still too early to determine the student-performance effects of these reforms, some preliminary findings regarding the implementation of CSRD at the national and local levels are covered. Readers further interested in comprehensive reform and evaluation are invited to visit the CSRD websites identified throughout this brief.

Definition of CSRD

In 1997 Congress authorized funding for incentive grants of at least \$50,000 per year to schools desiring to implement research-based reform models found effective in improving student performance. In July 1998 the first of a three-year series of grants made funds available to Title I (\$120) million) and non-Title I (\$25 million) schools. In 1999, an additional \$145 million in second-year funding was awarded. This was increased in year three (2000) to \$220 million. Each of the 50 states, the District of Columbia, Puerto Rico, the Virgin Islands, and three U.S. Pacific entities (American Samoa, the Commonwealth of the Northern Mariana Islands [CNMI], and Guam) were awarded this funding, which currently has been distributed to approximately 1,790 schools, nearly two-thirds of which are at the elementary level.

Role of Pacific-Based Departments of Education

In 1998, the Hawai'i State Department of Education (HIDOE) was the first Pacific-based recipient of CSRD funding. HIDOE received \$435,000 to implement CSRD in selected schools in the state. In 1998, American Samoa, CNMI, and Guam received \$121,000, \$66,000, and \$154,000 respectively in CSRD funding, HIDOE and the American Samoa Department of Education (ASDOE) opted to distribute these funds in the form of competitive grants to individual schools. CNMI and Guam received their CSRD funds in the form of block grants, which were supplied to schools at the discretion of their respective departments of education.

In distributing CSRD funds to individual schools, HIDOE and ASDOE are responsible for disseminating information on model programs, soliciting and reviewing CSRD grant proposals, awarding CSRD grants, and providing technical assistance and oversight on the conduct of CSRD activities. Public elementary and secondary schools electing to do so submitted competitive proposals to the

HIDOE and ASDOE detailing plans to implement school-reform models that had been shown to improve student achievement. CSRD grant proposals were received and reviewed, and schools selected as demonstration program sites were awarded funds to initiate these reforms. Eight schools were awarded funds in Hawai'i and two in American Samoa.

RESOURCES ON THE STATE AND DISTRICT ROLES IN REFORM

Consortium for Policy Research on Education (CPRE)

States and Districts and Comprehensive School Reform http://www.upenn.edu/gse/cpre/docs/pubs/ rb24.pdf

New American Schools

How to Create and Manage a Decentralized Education System

http://www.naschools.org/resource/howto/oddec.pdf

Federal Definition of School Reform

Federal legislation requires that CSRD projects include nine components deemed essential for a comprehensive school-reform effort. These components are:

- Use of effective research-based methods and strategies for improving student learning, instructional practices, and administrative functioning.
- Comprehensive and aligned design for school functioning, including instruction, assessment, classroom management, and professional development.
- High-quality and continuous professional development.
- Measurable goals and benchmarks for student performance.
- Support within the school among faculty, administrators, and staff.
- Parental and community involvement in reform planning and implementation.
- External technical support and assistance from a provider expert in schoolwide reform.
- Evaluation strategies for assessing reform implementation and outcomes.
- Coordination of financial resources to supplement grants and sustain reforms available to schools after the conclusion of the grant.

RESOURCES ON THE COMPONENTS OF A COMPREHENSIVE REFORM EFFORT

National Clearinghouse on Comprehensive School Reform

http://www.goodschools.gwu.edu

Northwest Regional Educational Laboratory

Comprehensive School Reform Self-Assessment Tool for Schools

http://www.nwrel.org/csrdp/tool2.pdf

School Reform Programs

Schools applying for awards are required to select or develop a "model" school-reform program established by empirical research as effective in improving students' academic performance. These models are the "heart" of CSRD and the basis of school-wide reforms. Schools are directed to base the selection or development of model programs on the needs of the particular school. These are identified through an initial evaluation of student-performance data.

Northwest Regional Educational Laboratory (NWREL) developed a *Catalog of School Reform Models* (1998) to provide schools and districts summary information regarding reform models. The models were selected on the basis of effectiveness, replicability, availability of implementation assistance, and comprehensiveness. The catalog with its addendum now contains sixty-four models which have been selected and reviewed by NWREL.

The models reviewed for application in CSRD can be differentiated according to the specificity of program prescription. Some models provide very specific directives regarding a school's curriculum and instructional practice, while others focus on a general philosophy toward education or a school's management style. In addition, of the 64 reform models, 33 are considered "entire-school" models and 31 are "skill- and content-based" (e.g., reading, math, science). The descriptions of models provided by NWREL include the following: ratings for the nine components, model origin and scope, general description, research results, technical-assistance provisions during implementation, costs, target populations, special considerations, selected evaluations, sample sites, and contact information. Over 200 model programs have been adopted by CSRD schools to date. Nearly three-quarters of the selected models, however, have been chosen from a list of 25. Table 1 lists the top ten models and their main features.

Table 1. Top Ten CSRD Model Programs, Main Features, and Yearly Cost

			First-Year
	Program	Main Features	Cost
		Provides reading and language-arts curriculum	
1	Success For All	and instructional strategies	\$70,000
		Provides "gifted and talented" curriculum to "at-	\$25,000 to
2	Accelerated Schools	risk" students	\$35,000
		Offers standards-based learning games and	\$75,000 to
3	Lightspan	family participation	\$140,000
		Focuses on curriculum and instruction by	
		setting out specific knowledge, skills, and	
4	Direct Instruction	instructional strategies	\$127,500
		Provides detailed, grade-specific core-subjects	
5	America's Choice	curriculum and standards-referenced exams	\$65,000
		Focuses on reading, mathematics, science, and	
6	Roots and Wings	social-studies curricula and instructional	\$70,000
		Key feature is a set of "common principles" that	\$50,000 to
7	Coalition of Essential Schools	focuses on curriculum and instruction	\$250,000
		Combines the content of traditional college-	\$25,000 to
8	High Schools That Work	preparatory studies with vocational studies	\$35,000
		technology into instruction, organizes lessons	
		around interdisciplinary projects, and	
		encourages reorganization of schools into	
9	Co-NECT	smaller learning communities	\$50,000
		Focuses on a curriculum that builds a common	
10	Core Knowledge	base of knowledge	\$10,000

Table 1 shows that the cost of applying a reform model can be substantially higher than the CSRD grant provision, requiring schools to leverage funds from other sources (e.g., Title I, Goals 2000) in order to subsidize the program cost.

None of the model programs currently available adequately encompasses each of the nine components of comprehensive reform as defined by the federal government. "Entire school models" tend to fit these criteria better than skill- and content-based models because they provide a mechanism for school-wide reform; however, it is necessary to augment model features with others developed by the school. Model programs are therefore an essential part of the reform process but do not subsume it.

RESOURCES FOR CHOOSING REFORM MODELS

Northwest Regional Educational Laboratory

Catalog of School Reform Models

http://www.nwrel.org/scpd/natspec/catalog

American Institutes for Research

An Educator's Guide to Schoolwide Reform http://www.aasa.org/Reform

Following the initial selection of a reform model, it becomes necessary to instruct school personnel about the model and to determine their level of commitment to reform. Because school reform is demanding, long-term, and often complex, it is feasible only when school faculty and administrators are committed to it. To increase commitment and promote informed decision-making, NWREL (1998) suggests the following process:

- Assess school needs for instructional improvement and school readiness for reform.
- Obtain initial information about a number of school-reform models.
- Develop understanding of selected models that may match school-reform needs.
- Discuss selected models with the full school community.
- Focus on a small number of models with the potential to meet school-reform needs. Hold
 in-depth discussions with the model developers to determine the extent to which the
 model/school match is strong and model use is feasible.
- Hold final discussions to confirm the decision to use one or more models and gain commitment to action on the part of the full school community (p. 2).

RESOURCES ON PLANNING FOR COMPREHENSIVE SCHOOL REFORM

WestEd Regional Education Laboratory

Comprehensive School Reform: Research-Based Strategies to Achieve High Standards http://www.wested.org/csrd/guidebook

U.S. Department of Education

Implementing Schoolwide Programs: An Idea Book on Planning http://www.ed.gov/pubs/Idea_Planning/

Technical Assistance

One of the features of CSRD that promotes its effectiveness is the presence of key technical-assistance providers, both at the program and national levels.

Model Developers. Model-program providers serve as an important resource for schools. In addition to offering a model, developers routinely provide technical assistance, aiding schools in their efforts

RESOURCES ON ARRANGEMENTS WITH MODEL DEVELOPERS

U.S. Department of Education

Guide to Working with Model Providers http://www.ed.gov/offices/compreform/model.pdf

American Institutes for Research

An Educator's Guide to Schoolwide Reform http://www.aasa.org/Reform

at program understanding, training, and implementation. This service, in the form of external schoolwide reform expertise, is a core component of CSRD.

Regional Educational Laboratories and Comprehensive Service Centers. In February 1998, Regional Educational Laboratories (REL) and Comprehensive Service Centers across the country began working with state departments of education, schools, and service providers to assist in CSRD implementation. Laboratories aided state educational agencies in designing the application process and provided other assistance, including program evaluation. Regional labs co-sponsored reform-model showcases, provided workshops and presentations, and disseminated related guides, products, and resources, including the Catalog of School Reform Models (NWREL, 1998) and Making Good Choices (NCREL, 1998). Regional labs have developed Internet websites with links to sources of information, like databases of funded schools and interactive listserves.

The REL and the Comprehensive Service Center at Pacific Resources for Education and Learning (PREL) provide technical expertise to assist individual schools in activities such as determining needs and readiness for reforms, selecting appropriate reform models, writing and submitting grant proposals, developing program-implementation plans, and evaluating the degree of program implementation and outcomes.

Evaluation of CSRD

Social programs, including educational programs, are developed to solve or ameliorate important social problems. Program evaluation focuses on whether or not the relevant problems have been positively affected. When programs are evaluated, two fundamental questions are addressed: "Was the program implemented as planned?" and "Did the program result in the planned improvements?" The goal of CSRD evaluation is to determine which program elements are working in order to inform administrative decisions regarding program improvements. The purpose of evaluation is not to simply monitor a program but to encourage its greater success by collaborating in the problem-solving process.

There are many collaborators in the educational problem-solving process, since CSRD evaluation occurs at many levels: national, state, and school. Though each level of evaluation addresses the central questions noted above, each applies unique research approaches and focal perspectives.

National Evaluation Plan. The CSRD national evaluation process employs multiple research approaches in order to track program implementation and effects. The first research approach applies the National Longitudinal Survey of Schools (NLSS) to a representative sample of CSRD schools. The NLSS explores the implementation of research-based models and their impact on instructional quality, and compares CSRD schools and non-CSRD schools on these and other factors.

The second approach investigates the integrity of reform implementation using in-depth "fieldfocused case studies" for a small sample of CSRD schools. This methodology allows for an exploratory investigation of the reform process, including its implementation, context, and causal relationship to school improvements.

Ultimately, national evaluation efforts measure the effectiveness of the reform process in terms of student-performance outcomes. To gather this information, longitudinal state-assessment data is also collected, and student achievement in CSRD schools is compared to matched comparison groups from non-CSRD schools over time.

State Evaluation Plan. States are also required to evaluate the implementation and impact of CSRD programs. Findings are reported to the federal government in Year 2 and 3 performance reports.

In the Pacific, the state evaluation of CSRD is a three-year project conducted by PREL in collaboration with HIDOE and ASDOE. Both formative and summative evaluation components are included in this project. The *formative* evaluation furnishes information on the match between the program as implemented and as planned, providing a basis for decisions to improve, replace, or augment specific aspects of the program. Multiple phases of program implementation are addressed including; technical assistance, demonstration-program site selection, demonstration-site program implementation, and program satisfaction.

The *summative* evaluation provides information related to CSRD goals and objectives, including student and school effectiveness. This information is collected over the three-year program period. The Year 1 summative evaluation focuses on collecting baseline data related to schools' Adequate Yearly Progress (AYP). This includes SAT-9 Reading, SAT-9 Mathematics, attendance rates, and school effectiveness, as reported by staff, parents, and students. These figures will serve as a baseline for future comparisons, both within CSRD schools longitudinally and with a comparison group of similar schools.

RESOURCES ON THE EFFECTIVE USE OF DATA

Northwest Regional Educational Lab Comprehensive Center

Evaluating Whole-School Reform Efforts: A Guide for District and School Staff http://www.nwrac.org/pub/whole-school.html

Mid-Continent Regional Educational Lab

Evaluating for Success: An Evaluation Guide for Schools and Districts http://www.mcrel.org/products/csrd-eval.asp

School Evaluation Plans. Individual schools are also required to conduct internal evaluations to address questions of program-implementation integrity and outcomes. Many model programs have inherent evaluation plans and provide guidance for monitoring program activities and measuring student outcomes. Checks on the way intended program activities have been conducted are often assessed according to a timeline for activities established by programs prior to CSRD initiation. The most common intended student outcomes proposed by CSRD schools in the state of Hawai'i and in American Samoa are improvements in SAT-9 math and reading and in attendance rates. The degree to which these outcomes are realized is measured over time, from baseline prior to program inception throughout the period of funding.

Early Findings of CSRD Evaluation: Lessons Learned

Though it is still too early to describe the initial impact of CSRD on the educational attainments of students, it is possible to provide information about program features and contexts that do or do not favor reform. Some of the major features of state assistance, school structures, and professional development that serve to foster or inhibit the integrity of CSRD implementation both nationally and in the Pacific region are described below. These findings provide early "lessons learned" for policy makers to apply in future waves of reform-funding decisions.

SEA Technical Assistance

Proposal Planning Time. Technical assistance from the state can provide tremendous initial influence on the quality of CSRD planning and implementation. National research shows that one of the main obstacles to adequate CSRD planning is the often short timeline during which schools are expected to prepare and submit proposals for funding. The insufficient time allotted for program planners to assess the needs of their schools, to match these needs against the models, and to obtain the informed commitment of school personnel has often made it difficult for schools to realize the fullest advantage of CSRD. Adequate planning and preparation for programs—especially major reform programs—is conducive to the realization of lasting improvements. Some states and districts have obtained planning grants for proposal development. Where the proposals were successful, these were followed by implementation grants.

Aligning Models with State Goals, Standards, and Assessments. In a literature review of 24 reform models, the American Institute for Research (2000) found that reform programs closely allied to school needs had a greater likelihood of successful implementation. However, selection of reform models is not determined by school needs alone. Factors such as state goals, standards, and assessments must also be considered. As states like Hawai'i develop content and performance standards and mandate their use within the public schools, the alignment of these standards with model-program elements becomes increasingly important. Some states provide liaisons to help align school and state goals.

In their concluding field-focused evaluation remarks regarding state and district considerations for CSRD the national evaluation office noted that "states need to play an active role in helping districts and schools become prepared for comprehensive school reform—through making connections among schools, districts, and model providers; giving schools and districts adequate planning time and resources; and cultivating strong leadership at the school level" (U.S. Department of Education, 2000, p. 40).

At the same time state departments of education are attempting to assist schools with reform, another reform is taking place in the processes by which states consider and enact school improvements. In instructing schools about empirically-based models of education reform, state administrators have gained expert knowledge in the research base of model programs. Some states, including Hawai'i, are using other sources of federal funds to encourage the continuation and expansion of CSRD in Title I schools. For example, Hawai'i provided \$200,000 in Title I carryover funds to schools interested in implementing CSRD programs. Goals 2000 funds have also been directed to this purpose. Research-based and comprehensive programs have become the exemplars from which states may ground decisions for future school-improvements funding.

Features of Schools

Features of schools which serve to assist or hinder the application of CSRD include leadership, organizational commitment, and parental involvement.

Leadership. Early evaluation of CSRD highlights the critical role of school leadership in the success of reforms. The principal's understanding of program elements, requirements, and consequences, and his or her commitment to carry out reforms over time are important advantages. Schools with ineffective and/or new leadership were found in the Hawai'i evaluation to have lower levels of implementation and staff support than similar programs with strong, continuous leadership. National evaluation efforts have also highlighted the importance of strong, visible, and supportive leadership to the successful implementation of reforms (American Institute for Research, 2000).

Strong leaders unify a faculty and motivate the necessary majority of teachers to engage in reform activities. An engaging principal can affect a faster initiation; a stable principal can provide the continuity of leadership necessary for program maintenance and improvement.

Organizational Commitment. The commitment of school personnel—especially teachers—to the process of reform is crucial, both when the model is selected and when the reform is being carried out. Reforms, like revolutions, are not easy. Successful implementation requires knowledge, time, effort, and a willingness to change. For teachers to invest in an innovation, they need to believe that the investment will pay off in terms of positive student outcomes. However, evidence of these outcomes is usually delayed while teachers struggle with learning, adapting, and applying new curricular and instructional practices.

Research on CSRD implementation has illuminated the complexities associated with gaining and maintaining organizational commitment, and the importance of its influence on programmatic change. In order to affect change at the institutional, whole-school level, it is necessary that a majority of teachers are sufficiently engaged in the activities that comprise the reform.

RESOURCES ON BUILDING AND SUSTAINING SCHOOL-LEVEL SUPPORT FOR REFORM

RAND

Lessons from New American Schools' Scale-Up Phase http://www.rand.org/publications/MR/MR942/MR942.pdf/

Parental Involvement. The importance of parental involvement in predicting students' academic success is a long-standing finding of educational research. For this reason, parental involvement is included in the nine core components defining comprehensive reform. In this way, legislation encourages the continuous participation of parents, beginning with the selection of schoolwide reforms and ending with the fullest application in their children's education.

CSRD evaluation work in Hawai'i indicates that parental involvement is the one feature of the nine CSRD components that is universally neglected or inadequately developed. In many cases, schools do not seem to know how to usefully involve parents beyond traditional avenues such as PTA, openhouses, and newsletters.

Professional Development

A key component of CSRD is the sustained provision of professional development and training in regard to program reform. This is important both in providing direction to teachers and administrators as they implement the reforms and later guidance as sequential aspects of the reform unfold. Models vary in levels of curricular and instructional specificity, and the time allotted to professionaldevelopment activities should adequately match the prescriptions.

RESOURCES ON FAMILY INVOLVEMENT

U.S. Department of Education

Compact for Learning http://www.ed.gov/pubs/Compact/

Strong Families, Strong Schools

http://eric-web.tc.columbia.edu/families/strong

In schools with high turnover rates for both staff and teachers, professional-development activities need to be routinely provided at the introductory level and beyond. One school in Hawai'i experiencing a transfer of teachers to a newly created school provided the new teachers with training from a cadre of teachers already "expert" in the program.

Allowing teachers the time to plan, conduct, and collaborate is another important and commonly overlooked aspect of professional development. To learn a new approach to education takes time; adapting the approach to the classroom is even more time-consuming. In nearly every Pacific school visited, the teachers cried out for time to learn, plan, and apply. Reviews of literature on the successful application of reform models also highlights the essential role of time in teacher training and planning (American Institutes for Research, 2000).

Summary and Conclusions

A third wave of educational reform is upon us. CSRD provides start-up funding for state-of-the-art education in school communities across the country and far into the Pacific. As a result of this endeavor, teachers, administrators, and departments of education are being instructed in empirically based reforms meant to affect entire school curricula and instructional practices.

We have demonstrated CSRD's grounding in educational research through the nine core components and reviewed the model programs that serve as the organizing framework of reform. An overview of evaluation designs at the national, state, and school levels has been presented along with early findings.

Findings from CSRD evaluation are currently limited to what we can discern about its implementation. However, important discoveries with implications for future reforms and for understanding measured outcomes have been made. We know that sufficient time for planning reforms is important, as is model-program relevance to state educational goals. A strong leader and universal commitment to the reform throughout the school community, including parents, increase the likelihood of successful implementation. Allotting time to teachers for planning and collaboration and for professional development is also important. These findings are consistent with those derived from evaluations of other school-reform efforts, such as *The Change Agent Study* (Berman & McLaughlin, 1978). Parallels include the importance of observing implementation before outcomes; providing professional-development opportunities specific to the reform; garnering support among a majority of teachers; maintaining strong leadership from the principal; and obtaining strong technical support from the state and/or district.

Full implementation of CSRD and assessment of the outcomes will take time, perhaps five years or more (Desimone, 2000). Ultimately, CSRD's most positive impact may be opening the minds of educators to the vast array of high-quality instructional and curricular practices, encouraging their application. CSRD opens up the field of education to the best that social science currently has to offer.

These are exciting days for educators as CSRD provides them with opportunities to ride the wave of comprehensive school reform into the future of education.

RESOURCES ON ALLOCATING TIME AND RESOURCES

Consortium for Policy Research in Education (CPRE)

Rethinking the Allocation of Teaching Resources: Some Lessons from High-Performing Schools http://www.upenn.edu/gse/cpre/docs/pubs/pb-03.pdf

U.S. Department of Education

Prisoners of Time

http://www.ed.gov/pubs/PrisonersOfTime/

References

- American Institutes for Research. (2000, August). *What we know about comprehensive school reform models.* Draft report prepared for the U.S. Department of Education Planning and Evaluation Service. Washington, DC: Author.
- Berman, P., & McLaughlin, M. W. (1978). *Federal program supporting educational change*. (Vol. 8). Santa Monica, CA: RAND. (ERIC Document Reproduction Service No. ED 159 289)
- Charles A. Dana Center, University of Texas. (1999). *Hope for urban education*. Washington, DC: U.S. Department of Education. Available: http://www.ed.gov/PDFDocs/urbaned.pdf
- Darling-Hammond, L. (1997). *The right to learn: A blueprint for creating schools that work*. San Francisco: Jossey-Bass. (ERIC Document Reproduction Service No. ED 418 090)
- Desimone, L. (2000). *Making comprehensive school reform work*. (Urban Diversity Series No. 112). New York: ERIC Clearinghouse on Urban Education.
- Hassel, B. (1998). *Comprehensive school reform: Making good choices*. Oak Brook, Illinois: North Central Regional Educational Laboratory.
- National Commission on Excellence in Education. (1983). *A nation at risk: The imperative for educational reform.* Washington, DC: Author. (ERIC Document Reproduction Service No. ED 226 006)
- Northwest Regional Educational Laboratory. (1998). *Catalog of school reform models* (1st ed.). Portland, Oregon: Author.
- U.S. Department of Education. (2000). *Early implementation of the Comprehensive School Reform Demonstration (CSRD) Program*. Washington, DC: Author. Available: http://www.ed.gov/offices/OESE/compreform/csrdimprpt.doc