

Council of the Great City Schools

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Great City Schools**

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February 27, 2012

The Honorable John Kline  
Chairman  
Education and the Workforce Committee  
U.S. House of Representatives  
Washington, D. C. 21015

The Honorable George Miller  
Ranking Member  
Education and the Workforce Committee  
U.S. House of Representatives  
Washington, D.C. 21045

Dear Chairman Kline and Ranking Member Miller:

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, opposes reporting the pending Elementary and Secondary Education Act (ESEA) reauthorization bills (H.R. 3989 and H.R. 3990). Our organization acknowledges the Committee's efforts to streamline and simplify this overly prescriptive federal statute. But, the bills have a number of fundamental problems that adversely impact the Great City Schools and the disadvantaged students nationwide who rely on these critical programs.

A major concern with H.R. 3989 lies in the lack of clear linkage between the academic performance of traditional (sub)groups of students and the accountability, intervention, and improvement actions that should follow. Moreover, delegating the bulk of accountability and improvement determinations to the state departments of education ignores the very limited instructional capabilities of most states and the historic mistreatment by many states of schools and communities with concentrations of poor and minority students. The initial round of state waiver applications from No Child Left Behind (NCLB) requirements underscores how easily states can evade accountability for critical low-performing student (sub)groups – low-income, racial and ethnic minorities, limited English proficient, and students with disabilities. The House Committee bill delegates even more discretion to state agencies than under the current NCLB waiver process, and will erode the essential ESEA focus on disadvantaged children and the schools they attend.

The lack of traditional "authorization of appropriations" provisions for important ESEA programs, such as for the English Language Acquisition Program and Indian Education Program, is an additional concern. And, the new authority under the bill to allow federal funds for English Language Learners or Native American students to be spent on other students does not reflect the type of flexibility or consolidation sought by the Great City Schools. In addition, H.R. 3989 would allow schools to spend Title I funds on non-disadvantaged students without the current "schoolwide" requirement of high concentrations of poverty.

Another major problem with the bill involves the significant reduction in the proportion of funds allocated to states and school districts on the basis of student poverty, thereby diverting sizeable amounts of federal funds away from the neediest students, including those in central city school districts. Moreover, H.R. 3989 increases the state set-aside under section 1003 of the Title I program by 150 percent, further reducing local school district formula grants by over three-quarters of a billion dollars annually. The Council also cannot support the creation of a \$2.6 billion block grant for state departments of education in H.R. 3990, providing states with nearly unfettered discretion over how the funds will be used or which schools and districts would receive a grant. The Council would prefer that the vast majority of the \$2.6 billion reserved for this purpose be allocated by an annual and predictable local formula grant to school districts. And finally, both of the Committee bills undercut the Elementary and Secondary

Education Act by eliminating the “maintenance of effort” provisions of the Act, which could allow states to lower their state education expenditures and use ESEA funds as an offset -- just as occurred with portions of the 2009 Stimulus funds.

The Council also strongly opposes a possible amendment by Representative Thompson to the Title I funding formula. The formula change would reduce funding for approximately 1,300 of the 14,000 eligible Title I school districts by some \$500 million upon full implementation. Nearly 70 percent of those reductions would be taken from the 100 largest school districts enrolling the greatest numbers of children in poverty. Ironically, some 2,200 school districts with “single digit” poverty rates would be among the beneficiaries of this formula change. The reduction in funds would fall disproportionately on the 1 percent of districts nationally that serve 32 percent of the country’s persistently lowest-achieving schools, three times the proportion of African-American and Hispanic students as rural schools, and 30 percent of the nation’s poor students. The Title I formula change, as introduced by Rep. Thompson in H.R. 2485, would weaken the fundamental purpose of the original Title I Program to assist not only poor students, but also low-achieving students and minority students.

The Council of the Great City Schools, therefore, is requesting a NO vote from members of the Committee on the two pending ESEA reauthorization bills (H.R. 3989 and H.R. 3990). The often divisive nature of the debate over federal authority versus state authority diverts attention from the most important local-level functions of teaching and learning. The Council would be pleased to work with the Committee to find a better balance between the overly prescriptive language under No Child Left Behind, the relatively unfettered state discretion under the pending ESEA bills, and the critical local instructional practices that are the basis for strong and effective academic improvement and the narrowing of achievement gaps. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Casserly". The signature is fluid and cursive, with a large initial "M" and a long, sweeping tail.

Michael Casserly  
Executive Director