

Passage of the Every Student Succeeds Act (ESSA) presents an opportunity for Colorado to explore innovation in service of student learning. While many of the conversations on the Hub Committee and at the State Board of Education meetings have focused on aligning Colorado's implementation plan with State and Federal law, more can be done to advance opportunities that serve Colorado students in chronically low performing schools. We believe it is in the best interest of students for the state to include the optional 3 percent set-aside of Title I dollars for Direct Student Services (DSS) in the plan they submit for approval from the United States Department of Education.

This optional set-aside would help ensure that both Comprehensive Support and Improvement (CSI) schools, as well as Targeted Support and Improvement (TSI) schools, have the resources necessary to improve outcomes for students. Taking advantage of this optional set-aside would offer pathways for improvement that go beyond professional development, leadership training, curricular support, and other adult and school-focused interventions, and focus school improvement efforts directly on supporting opportunities for students. While DSS are clearly part of school improvement strategies, a dedicated Title I program focused on these services would ensure that school improvement dollars are spent on services for students, and provide them with the potential for rapid improvement in schools and districts that have consistently failed them. These funds could be spent to increase access to career and technical education (CTE), advanced course work, school choice transportation, credit recovery, and components of personalized learning (which may include tutoring, competency based progression, and other strategies).¹

While districts are facing a decrease in formula disbursed Title I dollars due to the increase of state set-aside for school improvement and a pause on the hold harmless provisions of the Elementary and Secondary Education Act, districts that have schools identified as needing improvement are no longer required to reserve 5 to 20% of their Title I allocation to provide Supplemental Educational Services.² While SES requirements did not affect all schools, it does point to legislative support for dedicated funds for direct student services as a method to improve outcomes for kids. This optional set-aside would represent both a smaller decrease in funding than the pause on hold harmless, and a would be a smaller amount of required funds reserved for student services by districts with schools identified for improvement. CDE estimates that all districts would lose \$30 to \$40 per Title I student, an amount that wouldn't pay for a single administration of an AP test.³ Colorado should focus on an equitable

¹Chiefs for Change. "Implementing Change: Rethinking School Improvement Strategies Under the Every Student Succeeds Act (ESSA)." May, 2016. 20-21. See also Thomas B Fordham Institute "ESSA: The Potential of Direct Student Services" May 2016. Accessed January 31, 2017.

²Chiefs for Change. "Implementing Change: Rethinking School Improvement Strategies Under the Every Student Succeeds Act (ESSA)." May, 2016. 24.

³ College Board, AP Central. "Exam Fees" Accessed January 31, 2017.

distribution of funds, and instead of merely providing districts with a small per pupil disbursement, set aside and award resources to districts that have schools with the most need of support. This optional set-aside would allow CDE to establish a specific pathway, within the hybrid needs-based grant model they are proposing, for disbursement of school improvement funds and would further ensure an adequate amount of funds per student is awarded to the districts that need the most help to truly make a difference.

The DSS three percent set-aside is an opportunity that Colorado cannot miss in our efforts to improve outcomes for kids. It must be part of the state plan submitted to the US Department of Education. It represents the kind of flexibility that was promised to states and districts when ESSA was signed into law in 2015, and it allows Colorado to continue its reputation as a leader in innovative education policy. While the Hub Committee and the State Board of Education have a responsibility to ensure that the plan supports districts and addresses their concerns, the mission of the Colorado Department of Education is to ensure that all students are prepared for success in society, work, and life.⁴ This Title I set-aside is an important step towards ensuring the success of that mission.

Sincerely,

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⁴ Colorado Department of Education “About the Colorado Department of Education (CDE)” Accessed January 31, 2017.