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Implementation of School Level Program Provisions of Title I As Key to Ensuring Quality Education for All Students

Although the school-level program provisions of Title I/NCLB set forth what are key components of a high-quality education for *all* students [§§1114, 1115, 1116, 1118], the U.S. Department of Education has failed to focus on these critical elements and to ensure their implementation at the school level. It is the highest priority for students with disabilities, as all other students, that these components of the system of accountability supported by the billions of federal dollars in the Title I/NCLB program are, in fact, implemented *as required by law* to assist in improving the *school level programs*, so that students achieve in the first place. That program money comes attached to program provisions (particularly in sections 1114, 1115, and 1118) - for designing and implementing key program components of a quality education (i.e., an accelerated and enriched curriculum aligned with state standards; effective instructional methods; timely and effective assistance whenever any individual student is having difficulty mastering particular standards; and highly qualified teachers who receive on-going professional development to enable every child to learn to high levels) – through a plan jointly developed with the parents of the school, under a process spelled out in a jointly developed and approved parent involvement policy which also must spell out a variety of necessary components for building parents' capacity to participate effectively.

Recognition of these provisions of Title I/NCLB for building a *high-quality program* at the front end of the accountability system is critical to restoring the focus on the long-ignored but most important part of the system of accountability. Moreover, it is important to underscore that these programmatic requirements of the statute whose implementation is critical to ensure school and district level changes necessary for all students to learn what they are expected to know and be able to do are NOT currently perceived as legal mandates, and *must be* in order to ensure that all students learn. Similarly, it is important to recognize that what is *not* actually a legal requirement for schools – to hit the AYP targets – is currently treated as if it were and distorts the focus of school reform efforts.

Recommendation: The Department ought to give high priority to implementation and enforcement of the key school level program provisions of Title I (§§ 1114, 1115, 1116, 1118) that are designed to ensure high-quality education for all students, including students with disabilities.

Sections 1111 and 1112 of Title I/NCLB spell out state and district responsibilities in 1114, 1115, and 1118 for ensuring both that schools comply with these provisions that are so critically linked to all students including those with disabilities receive high quality education, *and* that schools have the capacity to do so. Additional recommendations: The U.S. Department of Education ought to ensure capacity and compliance by, *inter alia*, distributing information, providing technical assistance and program assessment, monitoring, and enforcement; providing annual reports on its implementation; establishing a grant program to strengthen state and district capacity for both school capacity-building assistance and enforcement; providing for an independent study of the extent of implementation at school level and of district, state, and federal capacity-building assistance for schools and enforcement of school-level provisions; building of independent capacity of parent and community organizations to assist parents in participating in these provisions; expanding and strengthening the Parent Information and Resource Centers (and local family information centers) so that they are robust, independent, proactive, unconstrained, and highly skilled sources of assistance for enabling parents to be the real partners the law envisions in implementing these local quality provisions and for effectively bringing attention to problems in their implementation.