How It Actually Works

We now look more closely at the actions of three jurisdictions to see how several of these interventions played out on the ground—SURR Schools in New York, Comprehensive School Reform in Memphis, Tennessee, and school reconstitution in Prince George's County, Maryland.

Schools Under Registration Review (SURR) in New York

The Registration Review process is the primary method by which New York's Board of Regents, the state-level education governing body, holds schools accountable for performance. By law "no school district may operate a public school whose registration has been revoked."[50] In its 1999 publication setting forth the Registration Review process, the New York State Department of Education (executive arm of the Board of Regents) indicated that schools identified as farthest from meeting the state's performance standards, or as providing poor learning environments, are in danger of being placed under Registration Review and having their registration revoked if they fail to show adequate improvement within three years.[51]

The Registration Review process has six steps. First, based on annual test results, the State Department of Education (DOE) identifies the worst performers among schools that fail to attain the minimum registration standard: 90 percent of students meeting or exceeding the state performance benchmark. These schools are placed under Registration Review and their respective local boards of education are notified that the schools are at risk of having their registration revoked. This notification includes a summary of the specific performance gains the school must achieve to lift the SURR designation.[52]

Second, the local board of education, upon learning of a school's designation, is required to notify the parents of students who attend the school and to disclose the information at the next public board meeting.[53]

Third, after public notification, the State DOE forms teams, led by district superintendents and comprised of teachers, board members, curriculum specialists and other education experts, parents, and state staff, to conduct a "resource, planning and program audit" of the school. This audit leads to a report that provides the offending school with improvement recommendations in the areas of instruction, curriculum, assessment, management, and leadership; staff qualifications and professional development; parent and community involvement; discipline; safety and security; instructional supplies and materials; the physical plant and facilities; and district-level support for school improvement efforts.[54]

Fourth, the districts in which the failing schools are located must develop "corrective action plans" to address the audits' findings. The State DOE expects these plans to be developed in consultation with school staff, parents, and community members, and, in the case of New York City schools governed by community school boards, with the district

superintendents and staff. This plan is submitted to the State DOE and revised annually while the school is under registration review. Similarly, the school, in consultation with State DOE and district staff, including the superintendent who leads the review team, is required to develop a "comprehensive education plan" based on its district's corrective action plan. This plan, too, is submitted to the State DOE and revised annually while the school is under registration review.[55]

Fifth, the State DOE periodically monitors the progress at the district and school levels to ensure successful implementation of both plans. The school is given up to three years to demonstrate improved student results. If it does, the local board of education may request that the State DOE remove the school from Registration Review status.[56]

Sixth, and finally, if the school does not make progress, "and if no extenuating circumstances exist," the State Commissioner of Education recommends to the Board of Regents that its registration be revoked. The school is shut down and its students sent to other schools based on a plan developed by the Commissioner.[57]

While schools are in the Registration Review process, they receive support and technical assistance from the State DOE and from their local districts. Thus, for example, in 1999-2000, all New York City SURR schools (which typically make up 90 percent of all SURR schools in the state[58] had the following resources available to them:

- New York Technical Assistance Center (NYTAC) at New York University, which provided curriculum-based parent training and support to parents;
- State DOE-sponsored reading and mathematics institutes for school staff;
- Access to a State DOE- and New York City Board of Education-sponsored pre-kindergarten conference;
- Technical assistance to compete for state-funded learning technology grants;
- Signing bonuses, performance pay, and loan forgiveness programs to recruit and retain qualified teachers and principals; and
- Mandated professional development days at the beginning of the school year, plus an onsite Teacher Center in each school to coordinate professional development.[59]

In addition, a subset of the New York City SURR schools was entrusted to the Chancellor's District, an administrative entity created in 1996 by then Chancellor Rudolph Crew to consolidate the City's most challenging schools—55 of them at the outset—under one administrative entity.[60] In 1999-2000, Chancellor's District schools received additional assistance consisting of a 45-minute extension of the school day, and class size reductions to 20 students in grades K–3 and 25 students in grades 4–8.[61]

Thus, in the formal SURR process and in the specific supports provided to SURR schools, one can see several intervention strategies at work simultaneously: identification, planning, technical assistance, profes-

sional development, more time, and the threat of closing schools. In addition, several New York City SURR schools have undergone a version of reconstitution, termed "redesign," in which the school administration and at least half the staff changes.[62]

Does SURR work?

Since its inception in 1989, 243 schools have received SURR designation. Of these, 116 schools (48 percent) have improved enough to be removed from the list (that is, they met the state criteria for sufficient performance improvement), 100 (41 percent) are currently on the SURR list, and 27 (11 percent) have been shut down.[63] Thus, about half of the schools that are designated SURR show healthy improvement.

Of the 243 schools that have received SURR designation, 116 schools have improved enough to be removed from the list

This success rate must be viewed in light of the fact that the standards for "graduating" from SURR are quite low. When comparing the performance of students in SURR schools that make it off the list with the performance standards on statewide tests, we see a bleak picture. Achievement tests in New York State have four performance levels—Level 1: Serious Academic Deficiencies; Level 2: Needs Extra Help; Level 3: Meets the Standards; and Level 4: Exceeds the Standards. As of January 2000, 81 percent of 4th graders in "graduated" SURR schools were still at Level 2 or below in English Language Arts (compared with a state-wide average of 40 percent), and 64 percent were at Level 2 or below in Mathematics (compared with a statewide average of 35 percent). At the eighth-grade level, the figures were 77 percent at Level 2 or below in English Language Arts (compared with 55 percent statewide), and 85 percent in Mathematics (compared with 60 percent statewide). Thus, among the 116 schools that improved enough to be removed from the SURR list, over 80 percent of their students still "need extra help" to meet state standards or have "serious academic deficiencies" in the two core subjects being monitored under NCLB.[64] Indeed, it is not clear that the standard for removal from the SURR list is enough progress to move that same school toward the performance levels envisioned in No Child Left Behind.

Note, too, how the SURR process is faring with respect to closing schools that have lingered in failure. One could argue that, if SURR cannot lead to great success, perhaps it can at least halt abject failure. As of August 2001, 19 SURR schools (19 percent) had been under review for more than five years.[65] The state's established standard expects action within three years, but this target is being missed by a considerable margin.

Thus, one can look at the results of the SURR process as promising—it seems to promote improvement in almost half of the failing schools that enter it. This promise, howev-

er, is hollow, as another half of its schools do not improve and, for those that do, these improvements do not assure that anywhere near enough of their students possess sufficient academic skills to pass, much less excel, in state tests. The SURR process does not make enough schools sufficiently better for the students they serve. It is undoubtedly better than no effort at all, but much more needs to be done to exact the improvements that New York's failing schools really need.

Comprehensive School Reform (CSR) in Memphis, Tennessee

Memphis is the 21st largest school district in the United States and the largest in Tennessee. It has 115,000 students in 164 schools. That 70 percent of all pupils participate in the federal free and reduced lunch program attests to the city's widespread poverty.[66]

In 1992, Gerry House was appointed superintendent of schools, after serving seven years in that capacity in Chapel Hill, North Carolina. She promptly set about the task of boosting student achievement in the Memphis schools,[67] and in so doing, developed a partnership with New American Schools (NAS).[68] In 1995, NAS selected Memphis as one of the ten "scale-up" jurisdictions across the country where its new school designs would be implemented.[69]

These designs resulted from a process that began in 1991 when 686 proposals were submitted to NASDC (as NAS was then known) for consideration. After almost a year of review, nine designs were selected, tested, and refined in approximately 150 schools.[70] While NAS funded the testing and development of these nine models, many other designs found other resources to support their development. Today, hundreds of different designs comprise the universe of Comprehensive School Reform (CSR) models.

As noted earlier, CSR models are designed to change multiple elements and processes of schools, including curriculum, planning, communications, instruction, and assessment, in order to boost student achievement. As the RAND Corporation indicated in a review of NAS models after 10 years, "[A] critical assumption underlying the designs is that coherent, focused, and sustained implementation of key design components (including professional development, curriculum and instructional materials, content and performance standards, assessments, organization and governance, and parent and community involvement) will eventually change school and classroom learning environments and thereby students' academic outcomes."[71]

At a system-wide principals meeting in the spring of 1995, House presented information on eight models—six NAS models and two independent models. Steven M. Ross of the University of Memphis, the foremost researcher on the Memphis CSR experience, described them as follows:

- *ATLAS* establishes a pathway across feeder schools while promoting use of "authentic learning" activities (e.g., real-world events affecting learners' lives).
- *Audrey Cohen College* orients learning activities around specific "purposes"

(e.g., "technology to meet human needs") for each semester in each grade.

- *Co-NECT* emphasizes integrating computer technology with project-based learning.
- *Expeditionary Learning Outward Bound* engages students in "expeditions" consisting of cooperative learning projects that integrate content from different subjects, such as mathematics, language arts, social studies, and art.
- *Modern Red Schoolhouse* individualizes student progress through different educational levels (as opposed to conventional grades), while using the Core Knowledge curriculum.
- *Roots and Wings* is distinguished by its inclusion of the widely used Success for All Reading Program along with a learner-centered math program (Math Wings) based on cooperative learning and problem solving, and integrated curriculum units (WorldLab).
- *Accelerated Schools* involves teachers in defining and addressing major goals for the schools, using collaborative decisionmaking, and engaging students in "powerful learning" (i.e., learning that is active and meaningful to students).
- *Paideia* also strongly emphasizes student-centered learning (as opposed to teacher-directed instruction), featuring teachers as "coaches" and students engaging in Socratic questioning.[72]

Thereafter, teams of teachers, parents, and community representatives from each school, led by their principals, reviewed the models. Fifty-four schools applied to participate in the first year of this effort and 34 were selected to launch the models in the fall. Fourteen more schools launched in fall 1996 and 19 did so in fall 1997.[73] As implementation in Memphis progressed, the program evolved from one in which schools opted to take part, to one in which adopting a design model became mandatory for every school. Thus, by the fall of 1998, all Memphis schools were implementing CSR.[74]

Does CSR work?

Steven Ross, William Sanders, and others have extensively analyzed student achievement during the CSR initiative in Memphis.[75] Making use of the sophisticated Tennessee Value-Added Assessment System (TVAAS) developed by Sanders and colleagues at the University of Tennessee, the research team analyzed student scores on Tennessee's statewide tests of math, reading, language, science, and social studies, which were administered in grades 4 and 5.[76] TVAAS is used to estimate annual gains in student performance—a measure of the value added by one year of instruction for a given student or set of students.[77] The team compared the value added by the early-adopting CSR schools with the value added by a set of demographically similar schools in Memphis that were not early adopters of CSR.[78]

These researchers found that the very first set of elementary schools to implement CSR added more value within two years after implementation than control group schools,

but that the schools that implemented in 1996 and 1997 did not demonstrate similar gains within their first two years.[79] Moreover, the researchers found that the first set of schools continued to demonstrate greater value added after the initial two years of reform.[80]

The very first set of schools to implement CSR added more value than control group schools, but the schools that implemented later did not demonstrate similar gains.

The findings of Ross and colleagues regarding Memphis' CSR are echoed in other research on the effects of CSR in other parts of the country. From its inception in 1992, New American Schools has been meticulously studied by the RAND Corporation. Over ten years, RAND has published 13 different studies on NAS CSR implementation and effectiveness. In 2002, RAND issued a study that summarized its key findings. With respect to student achievement in 163 schools, of which Memphis was a subset, RAND found that 81 schools (50 percent) made gains relative to district averages in mathematics, and 76 schools (47 percent) made gains relative to district averages in reading.[81]

Another important element of the Memphis experience is what happened after 1999. Late that year, House resigned as superintendent. She was succeeded by Johnnie Watson, who had served as deputy superintendent prior to House's arrival but had retired when she was appointed. Upon her departure, Watson came out of retirement and was appointed superintendent. After a year of review, Watson decided to completely shut down the CSR process in Memphis. Based on an internal study, he concluded that the process had failed to secure improvements in district schools. The study's methodology fails to support such a sweeping conclusion[82] and is not supported by analyses of performance in Memphis undertaken by more objective parties. Nevertheless, the superintendent, with the support of Memphis' new mayor (who also happened to be the superintendent House had replaced in the district), and the leadership of the Memphis Education Association, abruptly pulled the plug on the six-year, $12 million dollar CSR effort.

Thus, as an intervention strategy, CSR can and does work, but the best evidence suggests that it does so about half the time.[83] Furthermore, the costs and challenges associated with implementing it well are such that its existence can be fragile when circumstances—new district leadership in the case of Memphis—change.

Reconstitution in Prince George's County, Maryland

School reconstitution typically takes place in four steps:

1. Identifying schools that are significantly underperforming on a set of measures defined by the state or district;

2. Vacating or granting the authority to vacate staff and administrative positions;

3. Sometimes appointing a new principal; and

4. Hiring back a proportion of incumbent teachers and filling the rest of the positions with new staff.[84]

Why do this? Decision makers undertaking school reconstitutions typically work from these assumptions:

- That reconstitution will create more capable (skilled) and committed (willing) school faculty and staff;
- That the new faculty and staff will, based on their skills and commitment, redesign the failing school; and
- That the redesigned school will improve student achievement.[85]

In 1997, Jerome Clark was superintendent of the Prince George's County, Maryland Public Schools, a district with 125,000 students in 164 schools located in the suburbs of Washington, DC. He had served in this capacity for two years.[86] The district had a mixed population of middle class suburbs and urban poor, represented by a federal lunch program participation rate of 40 percent. Its enrollment is largely African-American.

By early 1997, Maryland had identified over 50 schools as "reconstitution eligible."

During the mid-1990s, Maryland was taking aggressive action to hold low-performing schools accountable. The state had a two-step process for intervening in failing schools. The first step was to deem a school "reconstitution eligible." This placed schools in a probationary period during which the school and district were expected to make changes while under increased state monitoring.[87] If the probationary schools did not improve, they became subject to State Board reconstitution (as noted earlier in the example of the state takeover and outsourcing of three Baltimore City schools in 2000). By early 1997, Maryland had identified over 50 schools as "reconstitution eligible." At that point, no Prince George's County school had been named to the state list. Nevertheless, prompted by the state's new focus and believing that "we should not wait for the state to come in and tell us to do something," on May 30, 1997, Clark announced he would reconstitute six county schools himself: Glassmanor, Ridgecrest, Riverdale, and Thomas Stone Elementary Schools; and Benjamin Stoddert and Drew Freeman Middle Schools.[88] All of the staff in the schools, from principal to janitor, were relieved of their positions, though they were also invited to reapply. If not interested in returning to their schools or not rehired, they were guaranteed jobs in other district schools.[89] Clark's intent "was to send a strong message that we couldn't do business as usual."[90]

By mid-July, 1997, the process of considering staffers for their former jobs was complete. Clark rehired the principal of Glassmanor Elementary School, who had only been there for two years. The five other prin-

cipals were reassigned within the district, and two principals, two vice principals, and a dean of academic affairs from other district schools were selected to lead the reconstituted schools. Throughout this process, the Prince George's County Educators' Association, the local teachers' union, took a neutral stance on Clark's efforts. [91]

Over three years of reconstitution, two of the six schools strongly outpaced the average gain for the state.

Among the teaching staff, 157 of the 246 released teachers reapplied for their old jobs, and 108 were rehired. Thus, 44 percent of the teaching force of the reconstituted schools returned for the 1997-98 year.[92]

During the summer, restructuring teams from each school, consisting of teachers, parents, and other community members, created improvement plans. By fall, the reconstituted schools, deemed "21st Century Reform Schools," made several programmatic changes. For example, Stoddert Middle School implemented block scheduling, increasing the amount of time spent on core subjects by 50 percent.[93] Glassmanor Elementary revamped its library and departmentalized instruction to have one teacher teach reading, language arts and social studies, and another teach math and science. Riverdale Elementary improved its computer lab, began after-school tutoring, and hired a full-time youth development coordinator.[94] In addition, a central office "instructional content team" was assigned to devise special programs for these schools.[95]

Was reconstitution an effective strategy to raise student achievement? At the time, Maryland administered tests in reading, writing, language usage, mathematics, science, and social studies in grades 3, 5, and 8 as part of the Maryland School Performance Assessment Program (MSPAP). From student test scores, the state calculated a Composite Index (CI) as an indicator of the average performance of a school's pupils across all six MSPAP content areas.[96] Relevant CIs are noted in Table 2.[97]

Table 2. Progress made by reconstituted schools

School	1996	1997	1998	1999	2000	Difference (1997-2000)
Benjamin Stoddert Middle	18.9	22.2	18.1	23.9	25.8	+3.6
Drew Freeman Middle	15.8	21.8	16.7	12.1	19.1	-2.7
Glassmanor Elementary	11.2	14.0	12.8	26.6	16.0	+2.0
Ridgecrest Elementary	12.2	14.0	23.3	22.2	29.8	+15.8
Riverdale Elementary	13.0	13.5	15.4	11.4	15.4	+1.9
Thomas Stone Elementary	12.0	17.4	12.8	14.8	46.0	+28.6
District	29.6	29.5	32.1	31.1	31.0	+1.5
State	40.7	41.8	44.1	43.8	45.3	+3.5

The 1996 data represent the school performance on which Clark based his decision to reconstitute the schools, and 1997 data represent the schools' performance for the final year prior to reconstitution. Over three years of reconstitution, two of the six schools strongly outpaced the average gain for the state. A third school, Benjamin Stoddert, gained ground commensurate with the state gain. But the remaining three schools lagged behind statewide gains. Thus, one of the six schools was able to "catch up" with its peer schools by virtue of the strong performance gains it made, one made substantial gains and appeared to be on a path to catching up with its peers, while the remaining four remained far behind the state average. In Prince George's County, at least, the results of this particular reconstitution turned out to be decidedly mixed.

This result mirrors the results from reconstitution efforts in other locations where it has been implemented—effective in improving student achievement in some schools, but yielding little or no improvement in others.[98] In a study on reconstitution for the Joyce and Spencer Foundations, Kent Peterson of the University of Wisconsin, draws seven lessons:

1. That reconstitution is "an enormously complex and difficult process of school reform";

2. That implementing states and districts have taken widely different approaches to reconstitution;

3. That student achievement results vary among reconstituted schools;

4. That reconstitution "takes an enormous amount of resources, skills, knowledge, and leadership" and that districts "need to commit some of their best people and many resources to support reconstitution";

5. That care is required in each stage of reconstitution—preparing, during, after the initial buzz subsides—in order for it to have a chance to succeed;

6. That "highly qualified, skilled school leadership remains critical to success"; and

7. That districts need to consider the many unintended consequences attendant to reconstitution efforts (e.g., low teacher morale and political conflict).[99]

Returning to Prince George's County, it is important to note two important elements of the interventions there. First, a key assumption of reconstitution is that a more skilled and committed school staff will replace the old staff. In Prince George's County, however, only two of the six new principals hired to run the reconstituted schools had any meaningful principal experience, and the majority of the staff in the new schools came from outside the district. Second, upon reconstituting the schools, there is little evidence that major programmatic changes accompanied the new staff. This is not surprising given how much of the reconstituted staff was new—they likely spent a great deal of time acclimating themselves to each other, to relatively inexperienced school leaders, and, for some teachers, to the district itself. An interesting question for further research is whether those districts that

hew most closely to the initial assumptions of reconstitution noted above find greater success when they move to reconstitute schools.

Thus, as an intervention strategy, reconstitution can work and has worked in some instances, but its success rate is limited.

Conclusions and Implications

Conclusions

The intervention experience offers several lessons as we look toward the promise of No Child Left Behind.

1. Some turnaround efforts have improved schools

There are examples of successful turnarounds. Dozens of schools have benefited from the technical assistance efforts of various states: half the schools in Memphis improved under Comprehensive School Reform, two of Prince George's County's schools have benefited meaningfully from being reconstituted, and several New Jersey schools' test scores improved, prompted by the district takeover. The intervention experience shows that some schools can go from failure to success.

2. Success is not the norm

While there have been successful turnarounds, the intervention experience is marked more by valiant effort than by notable success. Among many of the intervention types, a "success rate" of 50 percent is high and most interventions yield positive outcomes at lower rates. For efforts such as the New York SURR process, moreover, any assessment of the success rate of the intervention needs to take into consideration not just whether there is improvement, but also how much improvement is taking place. This concern might legitimately bear on other places and interventions, too.

3. No particular intervention type appears clearly more successful than any other

Among the 17 intervention types reviewed, there was no specific strategy that resulted in compelling evidence that it is superior to other interventions in terms of effectiveness. In the more than 100 books, journal articles, research briefs, presentations, websites, newspaper articles, and reports on interventions reviewed for this paper, there is, at present, no strong evidence that any particular intervention type works most of the time or in most places. To the contrary, the research base offers many instances where interventions that are successful in one setting fail in another.

4. Standard cost-benefit analyses of interventions may be misplaced

Since one cannot make major distinctions among the success rates of interventions, one might wonder if we can use a cost-benefit analysis to inform the use of intervention strategies. That is, one might ask which interventions offer the most bang for the buck. Standard cost-benefit analyses cannot work with interventions because it is the severity of the school's or district's failure that determines which intervention is most appropriate. In many states, strong intervention strategies are reserved for use after moderate and mild strategies have failed. This process typically results in the most broken schools and districts being subject to the most severe interventions. (After all, mild and moderate strategies should "work" for the schools that have much of the will and skill needed to fix themselves.) Accordingly, trying to compare costs and ben-

efits reveals little. The most severe school or district failures typically face the strongest interventions, which, as described earlier, typically carry with them the highest political and financial costs. Thus, while mild and moderate strategies appear to offer the most bang for the buck, they are least likely to work on the severest school and district failures.

5. School leadership is a common thread in successful turnarounds

While no particular intervention strategy leads to a high success rate, upon careful examination there is a common thread found in successful turnaround efforts: good school-level leadership. In most instances where a school made real gains, a strong and typically experienced principal was part of the effort. This sentiment was echoed in conversations with several superintendents who have undertaken turnaround efforts.[100]

6. Stronger intervention strategies are difficult and costly

Barbara Byrd-Bennett's frequent plane trips, Jersey City's dust-up over the Copernican Plan, and New York decision makers being the subject of protests over their actions to close failing schools demonstrate that turnaround efforts are not easy. They carry high political costs, and there are often backlash and unintended consequences associated with trying to improve the lot of failing schools.

7. Most decisionmakers accept failure rather than intervene

One of the ironies of the intervention experience is that those superintendents, education commissioners, governors, state boards of education, and others who have had the courage to aggressively address failing schools are far more likely to receive criticism for their lack of success than praise for their efforts. While it is important to know that turnaround efforts have not had high success rates, it is equally important to recognize that those who make the effort to change a weak principal, find the resources to support quality professional development, or take on the challenge of implementing comprehensive school reform are typically the exception, not the norm. While there are over 8,000 failing schools in this country, the relative paucity of examples provided by the intervention experience shows just how infrequently real action has been taken. Indeed, criticism is more properly directed at the many who have failed to act than at those who have shown the gumption to do so.

8. Interventions are typically implemented as packages, not discrete actions

As noted previously, interventions are typically implemented as groups, not individually. Furthermore, these groups vary as decisionmakers facing different contexts mix and match various strategies to form the response they feel most appropriate to their particular failing school.

9. Interventions are hard to sustain

As illustrated in Memphis and New Jersey, it is very difficult to sustain the momentum behind a turnaround effort as political circumstances change. Too often, it is the initial

act of intervention itself that captures most attention, not the hard sustained work of improving performance that the intervention is designed to support.

10. Interventions are uneven in implementation and unpredictable in practice

This report has described a set of discrete interventions and laid out a three-tiered typology that allows one to better understand how to think about them. NCLB has similarly offered a menu of potential interventions. The intervention experience has taught us, however, that the implementation of these interventions is uneven and unpredictable in practice.

Implications

Two major sets of implications flow from the intervention experience and the conclusions outlined above. First, there are implications for decisionmakers who will consider when, how and with what strategies to intervene in a failing school. These are:

1. The specific intervention strategy is not important. What's important is having the right mix of people, energy, timing, and other elements—particularly school leadership—that together contribute to success.[101]
2. Interventions come in many forms and flavors, and for each circumstance a different package might be appropriate.
3. Don't hesitate to mix and match.
4. Stick around (i.e., don't pass judgment too fast). Where interventions have been associated with success, it is typically two to three years before these results manifest themselves in test scores.
5. You will be criticized and sometimes vilified. Your efforts may be discarded when you leave. But know that you do have colleagues who are fighting the same fight and taking on the same battles.
6. Don't expect anything to work every time or everywhere.

The second set of implications concerns No Child Left Behind. The intervention experiences of the last decade suggest that there are three ways in which we ought to recognize the significant limits of what that ambitious law promises:

1. The law may expect too much too fast. If successful interventions take two to three years to *begin* to manifest results in terms of AYP, then the *measures* of success may prove slower than many of the law's timelines tolerate. There may need to be some give in the current process to prevent jarring changes in schools where success is on the horizon, but where the performance measures are not sufficiently sensitive to provide real-time evidence of this. That "give" should not be allowed to lead to the type of list-lingering one finds with SURR schools, but should take care to avoid throwing successful turnarounds off track.

2. States and districts should prepare for the challenge of widespread changes among a large number of schools by the 2007-08 school year. Since we have only seen a limited success rate for interventions to date, unless districts and states miraculously improve on what they've done, we can plan to see thousands of schools undergo the significant upheavals envisioned by the "restructuring" requirements of NCLB. State and local decisionmakers will need to begin considering how to handle the changes that these restructurings will prompt.

3. Some children will still need more than NCLB promises. While "restructuring" is the final step in NCLB intervention process, the experience in states and districts over the past decade indicates that restructuring will not always lead to improved schools. Reconstitutions and takeovers have resulted in many changes, but not all of their predicted—or needed—improvements. If we know this now, then we can project that even in those states and districts that implement the law most aggressively, there will still be children suffering in failing institutions. We need to consider other, more, and better options than we have to date concerning how to address these needs.

Thus, No Child Left Behind will force many districts and states to move more forcefully to meet the needs of students in failing schools. These actions should yield improved opportunities and better educational quality in some instances. If, however, we are genuinely concerned about the needs of children left behind, more—much more—will need to be done. The intervention experience provides little evidence to suggest that NCLB will lead to the revolution that failing schools need and that the children in them most assuredly deserve.

APPENDIX A

Interventions Mandated in the No Child Left Behind Act of 2001[102]

By Districts Into Schools

School Improvement

1. Provide students with the option to enroll in another school within in the district or a charter school within the district[103]
2. Develop or revise a school improvement plan[104]
3. Implement a comprehensive school reform model[105]
4. Provide targeted professional development for the teachers and principal[106]
5. Provide technical assistance to failing school[107]
6. Promote parental involvement in the school[108]
7. Provide before and after school activities, summer learning, and/or an extended school year[109]
8. Implement a teacher mentoring program[110]
9. Provide students with the option of tutoring services[111]

Corrective Action

10. Replace school staff who are the cause of the continued low performance[112]
11. Institute a new curriculum[113]
12. Significantly decrease management authority at the school[114]
13. Appoint an outside expert to advise the school[115]
14. Extend the school day or year[116]
15. Restructure the internal organizational structure of the school[117]

Restructuring

16. Reopen school as a public charter school[118]
17. Replace all or nearly all of the school staff—"reconstitution"[119]
18. Outsource school to a for-profit or other outside provider[120]
19. Turn over operation of the school to the state[121]

By States Into Districts

District Improvement

20. Develop or revise a district improvement plan[122]
21. Dedicate at least 10 percent of district Title I funds to teacher professional development[123]
22. Provide before and after school activities, summer learning, or an extended school year[124]
23. Provide technical assistance to failing district[125]
24. Promote parental involvement in the district[126]

Corrective Action

25. Defer funds or reduce district administrative funds[127]
26. Impose new curriculum on district[128]
27. Replace district personnel deemed relevant to low-performance[129]
28. Remove schools from district jurisdiction[130]
29. Replace superintendent and school board[131]
30. Abolish or restructure the school district[132]
31. Permit students to transfer to a school in another school district[133]

APPENDIX B

The Intervention Experience

This chart summarizes all of the interventions described in the print and electronic literature reviewed for this report. While no list of this sort can be exhaustive, it aims to be comprehensive. The autor welcomes information from readers about additional interventions and/or additional examples of the interventions described below. Please send information to him at rbrady@alumni.bowdoin.edu.

MILD		
Intervention Type	**Example(s)**	**Application**
Identification: Place school(s) on Low Performing Schools, Watch, or Failing Schools list	• 17 states place low-performing schools on a formal list[134]	Frequent
Planning: Require school(s) to create an improvement plan, or require district(s) to engage in district-wide planning process(es) (e.g., Strategic Planning, Baldridge, etc.)	• Pinellas County, FL[135] • Baltimore County, MD[136] • Chicago, IL[137]	Frequent
Technical Assistance: Provide technical assistance to school(s) or hire an outside expert to do so	• Baltimore, MD • Chicago, IL • Los Angeles, CA • Dade County, FL • Kentucky • Iowa • Mississippi • Bureau of Indian Affairs Schools[138] • North Carolina[139] • Oregon[140] • New York, NY • Alabama[141]	Frequent
Professional Development: Increase staff development, including teacher mentoring	• Boston, MA[142] • Green Bay, WI[143]	Frequent
Parent Involvement: Mandate creation of programs to increase parental involvement	• Atlanta, GA[144]	Frequent
Tutoring: Provide students with supplemental educational services	• Chicago, IL • Hillsborough County, FL[145]	Frequent

MODERATE

Intervention Type	Example(s)	Application
Add School Time: Create before & after school programs, Saturday learning opportunities, extended school year, programs, and/or reorganize use of time, such as block scheduling	• Cheverly, MD[146] • Jersey City, NJ	Frequent
Reorganize School: Change organizational structure within the school, for example school-based decision making	• Smithland, KY[147]	Limited
Comprehensive School Reform: Impose or require the selection and implementation of a Comprehensive School Reform model	• Memphis, TN[148] • New Jersey	Limited
Change Principal: Change school principal	• Chicago, IL[149] • Brevard County, FL[150]	Limited

STRONG

Intervention Type	Example(s)	Application
Reconstitution: Complete or near complete change in staff	• Brevard County, FL • Chicago, IL[151] • Cleveland, OH[152] • Denver, CO[153] • Houston, TX[154] • New York, NY[155] • Portland, OR[156] • Prince George's County, MD[157] • San Francisco, CA[158]	Limited
School Takeover: Takeover of school by state/removal of school from district jurisdiction	• Baltimore, MD • Gadsen City, AL • Montgomery County, AL • Anniston City, AL • Bessemer City, AL[159]	Limited

STRONG		
Intervention Type	**Example(s)**	**Application**
District Takeover: State (or its designee) removes and replaces school board and superintendent	• Baltimore, MD • Chicago, IL • Compton, CA • Detroit, MI • Hartford, CT • Jersey City, Paterson, and Newark NJ • Philadelphia and Chester Upland, PA • Roosevelt, NY • Washington, DC	Limited
Close School: Close school & remove accreditation, registration, etc.	• New York	Limited
Choice: Permit & fund students to choose another school within district, in another district, a charter school, or a private school	• Florida	Limited
Curriculum Change: Impose new curriculum on school(s)	• Paterson, NJ	Limited
Outsource: Outsource school to for-profit provider, non-profit provider, or college or university	• Chelsea, MA • Baltimore, MD[160] • Philadelphia, PA	Limited
Redirection of Funds: State defers some expenditures or cuts district administrative budget		Never Used
Withholding of Funds: Withhold funding to low-performing school		Never Used
Close District: State abolishes or restructures the district		Never Used

NOTES

[1] Neither the No Child Left Behind Act nor the United States Department of Education in its communications about the Act's provisions refers to schools as "failing." Rather, to recognize that these schools are not failing on all measures and to bring focus to the improvement effort, both refer to schools "in need of improvement." In this report, I will often use the term "failing" as it provides a more vivid picture of the circumstances the students who attend these schools are facing.

[2] Joseph P. Viteritti and Kevin Kosar, *The Tip of the Iceberg: SURR Schools and Academic Failure in New York City*, Civic Report, No. 16 (New York: Center for Civic Innovation at the Manhattan Institute, July 2001), 9.

[3] PL 107-110, 115 Stat. 1446 (Jan. 8, 2002), United States Department of Education, "Fact Sheet on Title I, Part A, July 2001" – http://www.ed.gov/offices/OUS/PES/esed/title_i_fact_sheet.doc.

[4] The most evergreen and thorough source of information on state-by-state policies on school accountability is maintained by Todd Ziebarth, Program Director of the Education Commission of the States National Center on Governing America's Schools. Please see ECS State Notes, *Accountability – Rewards & Sanctions*, http://www.ecs.org/clearinghouse/18/24/1824.pdf and the Commission's recent report "State Interventions in Low-Performing Schools and School Districts," published in August 2002.

[5] Kristin Cracium and Ravay Snow-Renner, "No Child Left Behind Policy Brief: Low-Performing Schools," Education Commission of the States, 2002.

[6] 34 CFR §200.18-19.

[7] 34 CFR §200.17.

[8] PL 107-110, 115 Stat. 1479 (Jan. 8, 2002).

[9] PL 107-110, 115 Stat. 1450 (Jan. 8, 2002).

[10] Lynn Olson and Erik W. Robelen, "Frustration Grows as States Await 'Adequate Yearly Progress' Advice," *Education Week* [electronic version], July 10, 2002.

[11] PL 107-110, 115 Stat. 1480 (Jan. 8, 2002).

[12] PL 107-110, 115 Stat. 1481 (Jan. 8, 2002).

[13] PL 107-110, 115 Stat. 1480 (Jan. 8, 2002).

[14] PL 107-110, 115 Stat. 1481 (Jan. 8, 2002).

[15] PL 107-110, 115 Stat. 1482 (Jan. 8, 2002).

[16] PL 107-110, 115 Stat. 1479 (Jan. 8, 2002).

[17] PL 107-110, 115 Stat. 1491 (Jan. 8, 2002).

[18] PL 107-110, 115 Stat. 1484 (Jan. 8, 2002).

[19] Data from PL 107-110 Stat. 1446-1490 (Jan. 8, 2002) and July 24, 2002. Dear Colleague Letter to education officials regarding implementation of *No Child Left Behind* and accountability, and providing guidance on adequate yearly progress, U.S. Secretary of Education, Rod Paige, http://www.ed.gov/News/Letters/020724.html.

[20] PL 107-110, 115 Stat. 1446 (Jan. 8, 2002).

[21] PL 107-110, 115 Stat. 1488 (Jan. 8, 2002).

[22] PL 107-110, 115 Stat. 1488-1489 (Jan. 8, 2002).

[23] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[24] *Turning Around Low-Performing Schools: A Guide for State and Local Leaders* (Washington, DC: United States Department of Education, May 1998), 1.

[25] National Center for Education Statistics, NAEP 1998 *Reading: Report Card for the Nation and the States* (Washington, DC: United States Department of Education, March 1999), 81 and National Center for Education Statistics, *The Nation's Report Card: Mathematics 2000* (Washington, DC: United States Department of Education, August 2000), 85-87.

[26] Ronald Edmonds, "Effective Schools for the Urban Poor," *Educational Leadership*, (October 1979): 22.

[27] Samuel Casey Carter, *No Excuses: Lessons from 21 High-Performing, High-Poverty Schools* (Washington, DC: The Heritage Foundation, 2000), 8-11.

[28] United States Department of Education, April 1983 - http://www.ed.gov/pubs/NatAtRisk/.

[29] http://www.myflorida.com/myflorida/education/learn/aplusplan/youKnow.html.

[30] Patricia J. Kannapel and Pam Coe, "Improving Schools and School Leaders," *All Children Can Learn: Lessons from the Kentucky Reform Experience*, Roger S. Pankratz and Joseph M. Petrosko, eds. (San Francisco: Josey-Bass, 2000), 159-176.

[31] USDOE, OESE, "School Improvement Report," 39.

[32] USDOE, OESE, "School Improvement Report," 41.

[33] ECS StateNotes, *Accountability – Rewards & Sanctions*, http://www.ecs.org/clearinghouse/18/24/1824.pdf.

[34] Carrie B. Chimerine, M. Bruce Haslam, and Katrina G. Laguarda, "Alternatives for Federally-Sponsored Technical Assistance for School Improvement: Lessons From Chapter 1 Program Improvement." Paper presented at the Annual Meeting of the American Educational Research Association, (New Orleans: April 1994) 1; Public School Forum of North Carolina, "Meeting the Challenge of Low Performing Schools," Policy Brief, March 1998; USDOE, OESE, "School Improvement Report," 38; Alabama Department of Education, Alabama Education News, August 2001.

[35] *Prisoners of Time: Report of the National Education Commission on Time and Learning*, April 1994 – http://www.ed.gov/pubs/PrisonersOfTime/.

[36] USDOE, OESE, "Turning Around Low-Performing Schools," 43.

[37] The National Clearinghouse for Comprehensive School Reform (NCCSR) – About CSR – http://www.goodschools.gwu.edu/about_csr/index.html.

[38] NCCSR – About CSR.

[39] Richard DiPatri, personal interview, November 20, 2002.

[40] Alabama Department of Education, Alabama Education News, August 2001 – http://www.alsde.edu/Archive/August2001_AEN.pdf; "2001 Stanford Nine Scores Show Intervention Works," Alabama Department of Education Press Release, June 28, 2001 –http://www.alsde.edu/general/2001_SAT9_%20NewsRelease.doc; "Questions and Answers About Academic Intervention" – http://www.alsde.edu/general/SAT9_QA_2001.doc.

[41] Darcia Harris Bowman, "Private Firms Tapped to Fix Maryland Schools," *Education Week* [electronic version], February 9, 2000.

[42] James A. Kadamus, "School Executive's Bulletin-February/March 2002," New York State Department of Education, Office of Elementary, Middle, Secondary and Continuing Education – http://222.emsc.nysed.gov/SB/feb02site/schlbltnf02.html.

[43] Alan Richard, "Florida Sees Surge in Use of Vouchers," *Education Week*, [electronic version] September 9, 2002 – http://www.edweek.org, https://www.opportunityschools.org/Info/OSP/osp_failing_schools.asp.

[44] Laval Wilson, "The Reality of Urban Education: A Position Paper Concerning the Need for Significantly More Instructional Time on Task to Improve the Achievement Skills of Paterson's Needy Urban Youth," [unpublished], (Paterson, New Jersey: June 1995), 7.

[45] ECS StateNotes "Accountability – Rewards & Sanctions," http://www.ecs.org/clearinghouse/18/24/1824.pdf.

[46] ECS StateNotes "Accountability – Rewards & Sanctions," http://www.ecs.org/clearinghouse/18/24/1824.pdf.

[47] Rutgers University, Institute on Education Law and Policy, "Developing a Plan for Reestablishing Local Control in the State-Operated School Districts," May 23, 2002.

[48] Catherine Gewertz, "N.J. Asks Court to Back Changes to Camden District," *Education Week*, [electronic version], October 2, 2002.

[49] Elizabeth Hays, "Concord School is Saved: Protests Spur Compromise to Keep Alternative High School," *New York Daily News* [electronic version], February 14, 2002.

[50] "The Registration Review Process: A Successful Approach to School Improvement," New York State Department of Education, Office of Elementary, Middle, Secondary and Continuing Education, 1999, 3.

[51] "The Registration Review Process," 3.

[52] "The Registration Review Process," 4.

[53] "The Registration Review Process," 5.

[54] "The Registration Review Process," 5-6.

[55] "The Registration Review Process," 6.

[56] "The Registration Review Process," 7.

[57] "The Registration Review Process," 7-8.

[58] Viteritti and Kosar, 1.

[59] Kadamus, "Status Report on Schools Under Registration Review (SURR)," *Report to the Members of the New York State Board of Regents*, January 26, 2000, 10-11.

[60] Viteritti and Kosar, 2.

[61] Kadamus, "Status Report 2000," 10-11.

[62] Kadamus, "Status Report on Schools Under Registration Review," *Report to the Members of the New York State Board of Regents*, January 11, 1999, 8.

[63] Kadamus, "School Executive's Bulletin."

[64] Kadamus, "Status Report 2000," 3.

[65] "Schools Under Registration Review (SURR) List," As of 8/1/2001 – http://www.emsc.nysed.gov/nyc/PDFs/2001AugSURRList.PDF.

[66] Steven M. Ross, William L. Sanders, S. Paul Wright, Sam Stringfield, L. Weiping Wang, and Marty Alberg, "Two-and Three-Year Achievement Results From the Memphis Restructuring Initiative," *School Effectiveness and School Improvement*, Vol 12, No. 3 (2001): 328.

[67] Steven M. Ross, "Creating Critical Mass for Restructuring: What Can We Learn from Memphis," *AEL Policy Briefs*, Charleston, WV: Appalachia Educational Lab, 2001, 3.

[68] NAS was the successor organization to the New American Schools Development Corporation (NASDC). NASDC, in turn, was the "break-the-mold" schools development effort prompted by America 2000. Where NASDC helped select and fund the early development of a set of new school designs, NAS is responsible for disseminating the now established designs.

[69] Ross, "Creating Critical Mass," 3.

[70] Ross, "Creating Critical Mass," 3.

[71] Mark Berends, Susan Bodilly and Sheila Kirby, *Facing the Challenge of Whole School Reform: New American Schools After a Decade*, (Santa Monica, CA: RAND Corporation, 2002) xx.

[72] Ross, "Creating Critical Mass," 4.

[73] Lana Smith, Steven Ross, Mary McNelis, Martha Squires, Rebecca Wasson, Sheryl Maxwell, Karen Weddle, Leslie Nath, Anna Grehan, and Tom Buggey, "The Memphis Restructuring Initiative: Analysis of Activities and Outcomes that Affect Implementation Success," *Education and Urban Society*, Vol. 30, No. 3, (May 1998): 298.

[74] Ross, "Creating Critical Mass," 8.

[75] Steven M. Ross, William L. Sanders, S. Paul Wright, Sam Stringfield, L. Weiping Wang, and Marty Alberg, "Fourth-Year Achievement Results on the Tennessee Value-Added Assessment System for Restructuring Schools in Memphis," *Paper Presented at the April 2001 Meeting of the American Educational Research Association*, Seattle Washington, April 2001, 1.

[76] Ross, *et al.*, "Fourth-Year Achievement Results," 1.

[77] Ross, *et al.*, "Two- and Three-Year Achievement Results," 329.

[78] Ross, *et al.*, "Fourth-Year Achievement Results," 2.

[79] Technically, the 1996 and 1997 adopters did demonstrate growth compared with non-CSR schools, but these were not statistically significant. Ross, *et al.* "Fourth-Year Achievement Results," 25.

[80] As of the publication of the Ross, Sanders, *et al.* report, 3rd and 4th year data was not available for the schools that implemented in 1996 and 1997. Thus, no conclusions can be drawn about how these schools may or may not have added value in the third and fourth years of their implementation of CSR.

[81] Berends, *et al.*, 130; Among the individual models, only one design demonstrated differential gains in both Reading and Mathematics for more than half of the schools in which the design was implemented—Modern Red School House with 64% of its schools demonstrating differential gains in Reading, and 73% demonstrating differential gains in Mathematics.

[82] James E. McLean, "A Review of Evaluation of the Comprehensive School Reform Models in the Memphis City Schools" August 2001, report commissioned by New American Schools.

[83] Earlier in this paper, we examined the improvements made by New York SURR schools, deeming these gains inadequate in light of the state's standards. Analyzing the Memphis experience suggests that a similar assessment be conducted there. This however, cannot readily be done. New York uses criterion-referenced tests as part of its state testing system, which indicates how students perform compared with established standards of "shows serious academic difficulties," "shows partial achievement of the standards, needs to improve," "achieves all the standards," and "exceeds the standards." With criterion-referenced tests, we can therefore say how many students in a school, including those who have left the SURR list, can now pass state tests. Our discussion of former SURR schools indicates precious few do. Tennessee however, has to date used only norm-referenced tests and these tests do not have passing or failing scores. Thus, the value-added gains of Memphis CSR schools represent performance vis-à-vis a peer group. Ross and colleagues outline other important comparisons. However, since there are no objective criteria against which to measure these gains, no passing or failing grades on state tests, we are unable to assess the quality of the gains as was the case with New York's SURR schools. For more information on the distinction between norm-referenced and criterion-referenced test, please see Gregory J. Cizek, *Filling In the Blanks: Putting Standardized Tests to the Test*, Thomas B. Fordham Foundation Report, Vol. 2, No. 11, October 1998, 11-13.

[84] Kent D. Peterson, "Reconstitution and School Reform: Issues and Lessons" – http://www.wcer.wisc.edu/ccvi/pubs/publication/archive/newsletter/Fall2000_CGInSystemicReform/Fall1999_Accountability/7.htm.

[85] Betty Malen, Robert Croninger, Donna Muncey, and Donna Redmond-Jones, "Reconstituting Schools: 'Testing' the 'Theory of Action,'" *Educational Evaluation and Policy Analysis*, Vol. 24, No.2, (Summer 2002): 114.

[86] John Mercurio, "'Get It Done' Got Clark Job; 1st Black to Head PG School System," *The Washington Times*, [electronic version] June 16, 1995.

[87] DeNeen L. Brown, "Teacher Turnover High in Shake-Up; Fewer Than Half Returning to 6 Reorganized Prince George's Schools," *The Washington Post* [electronic version], July 12, 1997, Maryland State Department of Education, "Fact Sheet 5: School Reconstitution-State Intervention Procedures for Schools Not Progressing Toward State Standards," January 2000 – http://www.msde.state.md.us/fact%20sheets/fact5.html.

[88] Lisa Frazier, "Six P.G. Schools Face Purge; Staff Must Resign, Reapply as Superintendent Seeks Improvement," *Washington Post* [electronic version], May 31, 1997.

[89] Mensah M. Dean, "P.G. Officials Mum on Criteria Used to Oust 49 Teachers; Teaching Ability Not Issue, They Say," *The Washington Times*, [electronic version], July 11, 1997.

[90] Larry Hardy, "Building Blocks of Reform: Is Reconstitution the Answer for Struggling Schools?" *American School Board Journal*, February 1999 – http://www.asbj.com/199902/0299coverstory.html.

[91] Lisa Frazier, "Five Prince George's Principals to be Replaced," *The Washington Post*, [electronic version], July 7, 1997.

[92] Brown. Selection criteria for the rehired teaching staff included having good evaluations, having advanced teaching certification, committing to summer professional development, fostering stability, and committing to three years at the reconstituted schools.

[93] Hardy.

[94] Lisa Frazier, "Recasting School in Riverdale; New Personnel, New Approach at Prince George's Elementary," *The Washington Post*, [electronic version], September 7, 1997.

[95] Frazier, May 31, 1997.

[96] http://msp.msde.state.md.us/smdef/mspap.asp and
http://msp.msde.state.md.us/smdef/Compositeindex.asp

[97] Data from Maryland Department of Education website – http://msp.msde.state.md.us.

[98] Caroline Hendrie, "A Mixed Record for Reconstitution Flashes a Yellow Light for Districts," *Education Week* [electronic edition], July 8, 1998.

[99] Kent D. Peterson, "School Reconstitution: Challenges and Opportunities," *Reform Talk*, a publication of the Comprehensive Regional Assistance Center Consortium – Region VI, Issue 12, December 1998 [electronic version].

[100] DiPatri, personal interview; Barbara Byrd-Bennett, personal interview, November 26, 2002; Peter Negroni, (former Springfield, MA superintendent and former New York City Community School District Superintendent), personal interview, November 26, 2002.

[101] Indeed in a recent study on the effects of Comprehensive School Reform, Geoffrey Borman and several colleagues under the aegis of the Center for the Education of Students Placed at Risk (CRESPAR) paid particular note to the degree to which the performance effects from implementing CSR varied (Geoffrey D. Borman, Gina M. Hewes, Laura T. Overman, Shelly Brown, "Comprehensive School Reform and Student Achievement: A Meta-Analysis," (Baltimore, MD: The Center for Research on the Education of Students Placed At Risk, Report No. 59, November 2002, 36). Based on this variation, they suggested that schools and policymakers select, implement or endorse a particular CSR model based on its track record in improving student achievement, not just that it meets a set of federal requirements to allow it to be called a CSR model (Borman, *et al.*, 39).

[102] Required only of Title I schools, PL 107-110, 115 Stat. 1446 (Jan 8, 2002).

[103] PL 107-110, 115 Stat. 1479 (Jan. 8, 2002).

[104] PL 107-110, 115 Stat. 1480 (Jan. 8, 2002).

[105] PL 107-110, 115 Stat. 1480 (Jan. 8, 2002).

[106] PL 107-110, 115 Stat. 1480 (Jan. 8, 2002).

[107] PL 107-110, 115 Stat. 1481 (Jan. 8, 2002).

[108] PL 107-110, 115 Stat. 1481 (Jan. 8, 2002).

[109] PL 107-110, 115 Stat. 1481 (Jan. 8, 2002).

[110] PL 107-110, 115 Stat. 1481 (Jan. 8, 2002).

[111] PL 107-110, 115 Stat. 1484 (Jan. 8, 2002).

[112] PL 107-110, 115 Stat. 1491 (Jan. 8, 2002).

[113] PL 107-110, 115 Stat. 1484 (Jan. 8, 2002).

[114] PL 107-110, 115 Stat. 1484 (Jan. 8, 2002).

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[118] PL 107-110, 115 Stat. 1485 (Jan. 8, 2002).

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[121] PL 107-110, 115 Stat. 1485 (Jan. 8, 2002).

[122] PL 107-110, 115 Stat. 1488 (Jan. 8, 2002).

[123] PL 107-110, 115 Stat. 1488 (Jan. 8, 2002).

[124] PL 107-110, 115 Stat. 1489 (Jan. 8, 2002).

[125] PL 107-110, 115 Stat. 1489 (Jan. 8, 2002).

[126] PL 107-110, 115 Stat. 1489 (Jan. 8, 2002).

[127] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[128] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[129] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[130] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[131] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[132] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[133] PL 107-110, 115 Stat. 1490 (Jan. 8, 2002).

[134] ECS State Notes, "Accountability – Rewards & Sanctions," http://www.ecs.org/clearinghouse/18/24/1824.pdf.

[135] United State Department of Education, Office of Elementary and Secondary Education, "School Improvement Report: Executive Order of Actions for Turning Around Low-Performing Schools," Washington, DC, January 2001, p.33.

[136] USDOE, OESE, "Turning Around Low-Performing Schools," p.2.

[137] USDOE, OESE, "Turning Around Low-Performing Schools," p.41.

[138] Chimerine, Carrie B., Haslam, M. Bruce, Laguarda, Katrina G., "Alternatives for Federally-Sponsored Technical Assistance for School Improvement: Lessons From Chapter 1 Program Improvement," Paper presented at the Annual Meeting of the American Educational Research Association, New Orleans, Louisiana, April 1994, p.1.

[139] Public School Forum of North Carolina, "Meeting the Challenge of Low-Performing Schools," Policy Brief, March 1998.

[140] USDOE, OESE, "School Improvement Report," p.38.

[141] Alabama Department of Education, *Alabama Education News*, August 2001.

[142] USDOE, OESE, "School Improvement Report," p.35.

[143] USDOE, OESE, "School Improvement Report," p. 42.

[144] USDOE, OESE, "School Improvement Report," p.39.

[145] USDOE, OESE, "School Improvement Report," p. 41.

[146] USDOE, OESE, "School Improvement Report," p. 37.

[147] USDOE, OESE, "Turning Around Low-Performing Schools," p.43.

[148] Borman, et al., pp. 31-40.

[149] Geoffrey D. Borman, Laura Rachuba, Amanda Datnow, Marty Alberg, Martha MacIver, Sam Stringfield, Steve Ross, "Four Models of School Improvement; Successes and Challenges in Reforming Low-Performing, High-Poverty Title I Schools," Center for Research on the Education of Students Placed At Risk Report No. 48, September 2000, p.8 (deduced).

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[151] Ron Wolk, "Strategies for Fixing Failing Schools," *Education Week*, November 18, 1998.

[152] Ron Wolk, "Strategies for Fixing Failing Schools," *Education Week*, November 18, 1998.

[153] Ron Wolk, "Strategies for Fixing Failing Schools," *Education Week*, November 18, 1998.

[154] USDOE, OESE, "Turning Around Low-Performing Schools," pp.44-45.

[155] James A. Kadamus, "Status Report on Schools Under Registration Review," *Report to the Members of the New York State Board of Regents*, January 11, 1999, p. 8.

[156] USDOE, OESE, "School Improvement Report," p. 44.

[157] Ron Wolk, "Strategies for Fixing Failing Schools," *Education Week*, November 18, 1998.

[158] Borman, et al., p. 17-30 (deduced).

[159] Alabama Department of Education, *Alabama Education News*, August 2001 – http://www.alsde.edu/Archive/August2001_AEN.pdf.

[160] Darcia Harris Bowman, "Md. Picks Edison to Run Three Baltimore Schools." *Education Week*, March 29, 2000.