



Benchmarks

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Raising the Bar: Requirements and Overall Approach of the Comprehensive School Reform Program within the Context of the 2001 NCLB Act

Themes from the Regional Symposia for CSR State Coordinators

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The 2001 Elementary and Secondary Education Act (ESEA), newly reauthorized by the No Child Left Behind Act (NCLB), signaled important changes for the Comprehensive School Reform (CSR) Program. One of the most significant changes is that CSR is no longer designated as a “demonstration” program. Equally significant is that most of the \$310 million FY2002 budget appropriated for CSR is under the authority of Part F of Title I, placing CSR under the wing of the largest federal program dedicated to assisting high-poverty schools.

To help state CSR coordinators, as well as key staff from the U.S. Department of Education-funded network of Regional Educational Laboratories and Comprehensive Centers, understand the implications of these and other changes for the CSR Program in the context of NCLB, the U.S. Department of Education, in partnership with the National Clearinghouse for Comprehensive School Reform (NCCSR), convened four regional CSR symposia. The day-and-a-half-long meetings took place in Washington, DC, Boston, Portland, and Chicago during the months of April and May of 2002. This issue of Benchmarks captures key aspects of these symposia discussions, as presented by the U.S. Department of Education, as well as comments and questions of symposia participants. Organized around the following three questions, this edition of Benchmarks provides guidance to all those involved in comprehensive school reform:

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About NCCSR—A partnership of The George Washington University, the Council for Basic Education, and the Institute for Educational Leadership

The National Clearinghouse for Comprehensive School Reform collects and disseminates information that builds the capacity of schools to raise the academic achievement of all students. Through its web site, reference and retrieval services, and publications, NCCSR is the central gateway to information on CSR. If you have documents on CSR that should be added to our database, please contact us for submission information.

- (1) What is the purpose of the CSR Program under NCLB?
- (2) How does NCLB “raise the bar” for the CSR Program?
- (3) How do new requirements affect the use of CSR funds?

As in the symposia, this issue of Benchmarks includes references to specific sections of the U.S. Department of Education’s “Guidance on the Comprehensive School Reform Program.” Readers are encouraged to access this document on the CSR Program website at <http://www.ed.gov/offices/OESE/compreform/guidance2002.html>.

Theme One: CSR Program Purpose

Enactment of NCLB left many wondering how much of the CSR Program had actually changed. One of the first points emphasized at the symposia was that the CSR Program’s primary *purpose*—to raise student achievement in the lowest performing, highest poverty schools where students and teachers are most in need of assistance—did not change under NCLB. Moreover, the program fulfills this mission in essentially the same way as the original CSR Program: by providing the highest need schools with seed funds to build sustainable efforts using the CSR framework. (See *Guidance*, section F-12.)

Unified Framework

As in the original program, CSR represents an approach to schoolwide improvement that is significantly different and more compelling than past reform efforts. Rather than adding another layer of reform to a school, CSR is based on the premise that “unified, coherent, integrated strategies for improvement, knitted together into a comprehensive design, will work

The program is built on the premise that unified, coherent, integrated strategies for improvement, knitted together into a comprehensive design, will work better than the same strategies implemented in isolation from each other.

better than the same strategies implemented in isolation from each other.” (See *Guidance*, section A-1.) A framework of eleven components defines what makes a CSR Program truly comprehensive. The framework requires schools to work beyond the original demonstration program. Two new components, in addition to the original nine, must be addressed by CSR grantees. (A full description of the eleven components is available on page 10.)

New Emphases

Though the fundamental purpose of the CSR Program has remained consistent, certain program emphases have changed. One change that is intended to improve fidelity to the CSR approach—i.e. the implementation of the comprehensive framework of eleven components—is the de-emphasis on externally developed reform models. For instance, relative to the original legislation, the reauthorized CSR Program contains minimal references to reform models.

With increased emphasis on research-based decision making in the new legislation, it is more important that schools focus on creating a comprehensive design made up of effective practices and strategies. Reform models, which have been too often misconstrued as the “silver bullet” for comprehensive school reform, can be a part of the comprehensive design, but cannot replace it. The federal CSR Program has never required schools to adopt an externally developed model, though the program’s guidance has often been interpreted in this way. When a school does adopt a model, however, it is the state education agency’s

responsibility to require that the school explains what other strategies will be employed to address those components not addressed by the model, thus yielding a truly comprehensive design.

Increased prioritization of CSR funds to high-poverty, low-performing schools represents another strong emphasis of the legislation. Though the CSR Program has always prioritized high-poverty schools, its authorization under Title I signifies an even greater emphasis on ensuring that the most needy schools are at the top of the list for the Title I portion of CSR funding. To do this, state education agencies (SEAs) and local education agencies (LEAs) must identify schools most in need, and LEAs must demonstrate a commitment to assisting them in their reform efforts. This concentration of attention on high-poverty, low-performing schools also encourages SEAs and LEAs to align and coordinate the administration of their program resources around this priority. When this happens at the state and district levels, it helps to support the integrative efforts at the school level, where CSR Program grantees are required to coordinate resources from all initiatives and weave their strategies and goals into the comprehensive school reform design. (See *Guidance*, section A-2.)

In addition to these new emphases, the legislation introduces many other ideas and requirements that intend to “raise the bar” for the quality and success of CSR programs in schools. The following section provides a summary of the symposia discussion around these aspects of the CSR Program and its implications at the state, district, and school levels.

Theme Two: Raising the Bar for CSR

During the symposia, much of the discussion centered on how the legislation “raises the bar” for the

CSR Program. New legislated requirements challenge SEAs, LEAs, and schools to create stronger schoolwide improvement efforts in several important ways:

- Decision making using scientifically based research;
- Creating stronger accountability through evaluation;
- Increasing flexibility;
- Requiring commitment to the neediest schools;
- Requiring support for school staff; and
- Raising expectations for the quality of technical assistance to schools.

Decision Making Using Scientifically Based Research

One of the most significant changes in the CSR Program is the emphasis on using scientifically based research (SBR) to make decisions about school programs and practices. The CSR Program is just one of many federal initiatives in NCLB that require practitioners to examine the highest quality scientifically based research available for evidence of student achievement results before adopting programs and practices. As defined in section 9101 (37) of NCLB, SBR is “research that involves the application of rigorous, systematic and objective procedures to obtain reliable and valid knowledge relevant to education activities and programs . . .” (See *Guidance*, section B-2). Rigorous, scientifically based research that employs random assignment and control-group methods is commonly referred to as the “gold standard” that schools and SEAs must use to assess the value of instructional strategies employed in a CSR program for increasing student achievement in a given school context. When designing a school’s CSR plan, schools must also seek studies which demonstrate credible evidence of a program’s or strategy’s ability to increase student achievement.

Given the strong emphasis on scientifically based research, symposia participants expressed concern as to whether qualitative research must be excluded from

consideration in determining school practices. The CSR Program staff emphasized that while randomized, control-group experiments are desired, other types of research can and should be considered to help practitioners make informed decisions. For example, a case study is useful if its findings can be confirmed by on-site observations, or the study involves multiple sites compared with selected comparison schools.

The emphasis on SBR appears in two distinct components—numbers one and eleven—of the CSR program framework.

Component One

Component one, which appeared in the original CSR legislation, has been modified to require that SBR be applied specifically to the practices and methods used in “student learning, teaching, and school management.” Previously, schools and districts were required only to find “reliable” research before adopting such practices and methods. NCLB raises the bar for practitioners, who must now justify—with findings from scientifically based research—that the practices they choose to adopt show evidence of effectiveness on student achievement and that they are replicable. Thus, component one presses schools and LEAs to hone in on the aspects of their comprehensive school reform program related to instructional methods; particular emphasis is placed on the subjects of math and reading. Even when adopting an externally developed reform model, the school is responsible for looking critically “inside” the model to ensure that it

incorporates scientifically based methods and practices.

Component Eleven

Component eleven entails a broader interpretation of the SBR requirement. It says that schools are required to implement comprehensive school reform programs that have been found either through SBR or other strong evidence, to significantly improve the academic achievement of students. Thus, the school must make the case that there is sufficient research or strong evidence indicating that its CSR program—the sum of all its components—transforms school practices in a way that will significantly improve student achievement.

Although applying the criteria of scientifically based research to CSR programs is extremely challenging, the CSR Program staff encouraged participants to understand that the intent of this new requirement is to raise the standard so that reforms are carefully scrutinized before being adopted. By working together to ensure decisions are based on the highest quality research available, practitioners strengthen their professionalism and investment in the implementation of their school’s CSR program.

Stronger Accountability Through Evaluation

Requirements that increase accountability for SEAs are another key way in which the new CSR Program raises the bar for CSR to ensure that quality programs are implemented. Though SEAs, LEAs and schools were required to conduct program evaluations under the original CSR Program, the new CSR Program requires SEAs to submit their evaluations to the U.S. Department of Education on an annual basis. These evaluations must address student achievement and CSR program implementation. SEAs are thus held more accountable for ensuring that school progress is made, measured, and reported.

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Q & A: What if “gold standard” research is not available?

There are some CSR Program components for which randomized, control-group (“gold standard”) experiments do not exist. In all cases, the objective of the legislation is to begin moving practitioners towards a higher bar for research-based decision making. Until “gold standard” research exists for each CSR Program component, practitioners must find the best available information.

For example, a school seeking to incorporate a strategy to improve parent and community involvement—a component that presently does not yet have strong scientific research base—must consider the strongest evidence available and also take into account professional standards for quality practice. Practitioners at this school might, for instance, review the National Staff Development Council’s standards of professional development framework developed by over a dozen professional organizations. Such an effort to find strong evidence, and take into account standards that have been vetted by the profession, ensures that programs selected offer the most promise to improve the school.

Additionally, practitioners can find assistance in portions of NCLB. For example, Title IX, Part A, Section 9101 provides an outline of standards of quality for professional development, and Title I, Part A, Section 1118 offers criteria for quality parental involvement. Both can be useful in helping a school determine the value of a program or practice that does not have SBR-quality findings to substantiate it.

Annual evaluations also play an important role in determining continuation funding. Some SEAs use outside evaluators who look at school structures; others conduct impact surveys to determine whether schools are meeting benchmarks; elsewhere, school liaisons give feedback. One state uses a “portfolio of readiness” system: district portfolios demonstrate their progress in supporting schools and school portfolios demonstrate evidence of student achievement. The SEA’s responsibility is to synthesize these various sources of data to paint a picture of change and progress.

The CSR Program staff reviewed the guidance concerning CSR continuation awards. Before making these awards, SEAs must determine whether suffi-

There are several resources available or currently being developed to help practitioners develop the “critical consumer” mentality that research-based decision making requires. Appendix C, “Scientifically Based Research and the Comprehensive School Reform Program,” of the *Guidance* contains several important tools to assist practitioners and a list of key resources for schools (<http://www.ed.gov/offices/OESE/compreform/appendc.pdf>). NCCSR is currently working with the Regional Education Labs and several SEAs to spearhead the development of a workshop (available in early 2003) to help practitioners understand and apply research in the context of school reform. Also under development is the What Works Clearinghouse, a resource that will provide information on practices that meet the gold standard of scientifically based research (<http://www.w-w-c.org>).

Q & A: What elements must be addressed in the annual evaluation?

The CSR Program staff explained that student achievement data reported in the annual evaluation should be consistent with data reported for the Title I program evaluation. Further, while LEAs are permitted to use a compilation of school-level evaluations to fulfill their evaluation requirement, it is not acceptable for SEAs to submit a collection of data gathered by schools and LEAs. SEAs must conduct and submit their own evaluation of grantees to fulfill this requirement. (See *Guidance*, section I-3.)

cient implementation progress has been made. CSR grant funds for years two and three are awarded *if the SEA determines* that a school is adequately implementing its CSR plan. If the SEA determines that a school has failed to implement its CSR plan, the school can reapply for funds if certain conditions are met. The school must correct the deficiencies that led to the withdrawal of funds, complete the CSR planning process and needs assessment, and participate in the CSR funding competition on the same basis as all other applicants. (See *Guidance*, section G-15.) If the state decides progress is not sufficient to continue funding, it must use those funds to establish new CSR programs or support CSR activities at other existing CSR sites. (See *Guidance*, sections F-21 and F-22.)

To evaluate implementation, SEAs may wish to use indicators such as the following: (1) measures of the school staff's awareness of and involvement in reform; (2) the amount and quality of professional development for teachers; and (3) the degree to which the reform plan is being implemented in every class-

room in a CSR school. A school may, after consultation with its LEA and with the permission of the SEA, change its CSR designs and keep its funding. (See *Guidance*, section G-14.) Revising a CSR plan is permissible and even encouraged if the change is the result of a school's careful review of data indicating that its current program is not working.

Increased Flexibility

In addition to increasing accountability, the CSR Program raises the bar by increasing flexibility. For example, states may apply for funds using the Consolidated State Application or through a CSR Program application, which can be requested directly from the CSR Program office. Some flexibility in timing grant competitions (see *Guidance*, sections G-5 and G-9) is also available. The CSR Program also emphasizes the need for districts and schools to exercise flexibility in resource allocation, allowing schools to design CSR programs that will access resources from multiple sources, thus increasing the likelihood that CSR awards will seed and spark school improvement that is sustained over time.

Commitment to the Neediest Schools

Although SEAs may establish additional priorities for making awards, the new CSR Program legislation requires that LEAs or consortia of schools meet a two-part priority: (1) that they will use CSR funds in schools identified as being in need of improvement or corrective action (as defined by section 1116c), and (2) that they are committed to assisting those schools in their reform efforts. (See *Guidance*, section F-3.) This priority for distributing funds exemplifies one way in which the CSR Program has become more closely aligned with the new Title I accountability system.

Support for School Staff

The symposia also addressed the expectations inherent in component six—the new requirement for schools to provide support for teachers and school staff. Though the *Guidance* does not provide specific mandates on

how this support must be provided, the CSR Program staff pointed out that support for school staff shouldn't only be thought of as financial support, and can include providing teachers with common planning time, and distributing leadership among teachers.

To address component six, schools must identify support around all components of their comprehensive design. One way schools can do this is by considering school staff needs in the selection of external providers of technical assistance (component eight). Although many schools use model providers as a key source of technical assistance, the providers typically provide assistance only with implementation of their model, rather than for all CSR components. In such cases, applicants must identify additional technical assistance providers who will support other aspects of their school program. Model providers may also be compelled by component six to provide more comprehensive assistance to teachers and staff. In one state, model providers are considered the external technical assistance provider, but the schools also engage other external technical assistance providers for the other components not addressed by the model. The CSR Program staff encouraged schools to use high standards for quality professional development, such as those as outlined in Title IX, Part A, Section 9101 as a helpful reference point in addressing staff support.

While it is the school's responsibility to identify support around all components, it is the SEA's and the LEA's responsibility to hold them accountable for doing so. The CSR Program staff emphasized, above all, that component six is about building capacity at the school level, and thus is critical for ensuring the sustainability of comprehensive school reform programs beyond the three-year award cycle.

Raising Expectations for High-Quality Technical Assistance

A new provision in the CSR Program legislation stipulates that SEAs must know, with reasonable certainty,

whether external technical assistance providers identified in CSR applications possess the capacity and expertise to support the school's CSR program. To do so, SEAs must develop a system to obtain from technical assistance providers assurances of their financial stability, track record of success in similar schools, and capacity to deliver high-quality materials, professional development and implementation support to the school. (See *Guidance*, section D-3.)

The federal CSR Program staff also encouraged SEAs to demonstrate the idea that "we're all in this together" by extending technical assistance to LEAs and schools beyond the application process. SEAs should consider ways to provide post-award assistance to support grantees in specific aspects of planning, implementing, sustaining, and monitoring the progress of its CSR programs. (See *Guidance*, sections H-1 through H-6.)

Theme Three: CSR Funds

Though the legislation provides clear information on requirements regarding the use of CSR Program funds, several important ideas not immediately evident in the *Guidance* were explained during the symposia. First, the CSR Program represents a significant federal investment that directly impacts reform at the school level. Further, a clearly defined priority in the new legislation provides an extremely important driver for identifying those schools most in need of improvement.

The \$310 million FY2002 budget for the CSR Program was appropriated under two separate authorities, or funding streams: under Title I, Part F, and under the Fund for the Improvement of Education (FIE). The intent of the legislation is clear: the bulk of CSR funds are to be used only for Title I-eligible schools.

CSR funds become available to SEAs beginning on July 1 of each year, once their state applications have been approved. The SEA may reserve up to five percent of its CSR funds for administration, evaluation and technical assistance. (See *Guidance*, sections C-3, E-1, F-6 and G-6.) The minimum annual CSR award to LEAs is \$50,000. As before, CSR Program funds are still intended only for schools *initiating* reform and CSR award schools *cannot* reapply for funds once the three-year funding cycle is complete—regardless of the success or failure of their reform efforts. (See *Guidance*, section G-3.)

During the symposia, the CSR Program staff responded to the oft-heard complaint that the \$50,000 minimum award does not come close to covering the cost of full implementation of many national reform models. While acknowledging this reality, they asked state coordinators to understand and make clear to LEAs an important distinction: this amount is not intended to subsidize implementation of a *model* at a school, but rather to provide seed funding that will enable schools to leverage other sources to support the implementation of the school’s comprehensive reform program. State coordinators were also reminded that SEAs may fund schools at higher levels, and urged them to base their decisions on levels of need in addition to the quality of the application. Because of varying levels of need, SEAs were also urged to consider funding schools at varying levels rather than determining a common award amount for every school.

Funding for Title I-eligible Schools

The federal CSR Program staff made two important points of clarification regarding Title I-eligible schools. First, even if a school is not receiving Title I funds, it is eligible for CSR funds so long as it is Title I-eligible. This is an important distinction because many high-poverty, low-performing high schools and middle schools do not receive Title I funds due to LEA policies that concentrate improvement activities at the el-

Q & A: Many SEAs do not have the staff necessary to set up and maintain a system of obtaining quality assurances from external providers of technical assistance. How can they comply with this new provision?

The staff of the CSR Program explained that while SEAs will not be expected to establish a complex quality assurance system immediately, there are relatively simple steps they can take now, such as requiring written statements of assurance from external providers of technical assistance, to begin establishing for them a higher standard of accountability to schools. State coordinators were asked to keep in mind that this new requirement empowers SEAs to protect schools by “pulling the plug” on unscrupulous external technical assistance providers.

ementary level. Thus, secondary schools with great need for reform need not be left out of the CSR Program.

States are permitted to create competitive priorities in addition to the one required in the legislation. Competitive priorities do not exclude any applicants, but provide additional points or advantages to applicants who meet certain requirements. For instance, states can create a competitive priority for elementary schools or for secondary schools that will give the identified applicants a measured advantage. (States can request a waiver to limit CSR competitions *absolutely* to specific grade levels, but normally competitions must be open to all grades K-12. Applications to serve specified grade levels can be given *competitive* priority without requesting a waiver as long as other applicants are not excluded.) SEAs were cautioned not to make competitive priority

[E]ven if a school is not receiving Title I funds, it is eligible for CSR funds as long as it is Title-I eligible. . . . [S]econdary schools with great need for reform need not be left out of the CSR Program.

provide participants with both information and inspiration to assist their efforts to produce CSR programs that significantly raise student achievement at the nation's lowest performing schools. This issue of Benchmarks has sought to do the same for educators at all levels who are engaged in and committed to successful comprehensive school reform.

points so high for one priority type that other high-quality applications are eliminated from the competition.

The federal CSR Program staff also explained that the size of state CSR awards is determined by the formulas established for Title I and FIE eligibility (the number of school children aged 5-17). Thus, the proportion of CSR funds allocated in each state will change if there are changes in the relative numbers of their students living in poverty or total student population.

Both the U.S. Department of Education and NCCSR are dedicated to providing ongoing assistance, tools and resources to help those at all levels engaged in CSR. For more information about available technical assistance and resources, go to the NCCSR website at <http://www.goodschools.gwu.edu>, and to the U.S. Department of Education CSR Program Office website at <http://www.ed.gov/offices/OESE/compreform/index.html>.

Summary

With the passage of the No Child Left Behind Act of 2001, state education agencies, local education agencies, and schools receiving CSR funds are challenged to think about comprehensive school reform in new and innovative ways. One of the greatest challenges posed by the new legislation is for practitioners to incorporate research-based decision making into the process of planning and implementing CSR. The intent of this, and other key changes to the 2001 CSR Program, is to “raise the bar” for all engaged in the CSR process for the purpose of significantly improving student achievement. Though the new requirements are challenging, they also provide opportunities for a more successful comprehensive school reform effort.

By focusing on both the overarching themes and the specific requirements during the CSR regional symposia, the CSR Program staff and NCCSR sought to

The Eleven Components of the Comprehensive School Reform Program

To receive funding through their SEA, schools must develop a CSR program that coherently incorporates each of the eleven components listed below. The CSR Program staff noted that there is no particular significance accorded to the numerical order in which these components appear in the legislation, and encouraged SEAs and LEAs to order them in ways found to be most useful. (Italicized text indicates additions and revisions to the CSR Program that were made under NCLB.) To be comprehensive, a CSR program

1. employs proven strategies and proven methods for student learning, teaching, and school management that *are based on scientifically based research and effective practices and have been replicated successfully in schools*;
2. integrates a comprehensive design for effective school functioning, including instruction, assessment, classroom management, professional development, parental involvement, and school management, that aligns the school's curriculum, technology, and professional development into a comprehensive school reform plan for schoolwide change designed to enable all students to meet challenging State content and student academic achievement standards and addresses needs identified through a school needs assessment;
3. provides high-quality and continuous teacher and staff professional development;
4. includes measurable goals for student academic achievement and benchmarks for meeting such goals;
5. is supported by teachers, principals, administrators, school personnel staff, and other professional staff;
6. *provides support for teachers, principals, administrators, and other school staff*;
7. provides for the meaningful involvement of parents and the local community in planning, implementing, and evaluating school improvement activities consistent with section 1118;
8. uses high-quality external technical support and assistance from an entity that has experience and expertise in schoolwide reform and improvement, which may include an institution of higher education;
9. includes a plan for the *annual* evaluation of the implementation of school reforms and the student results achieved;
10. identifies other resources, including Federal, State, local, and private resources, that shall be used to coordinate services that will support and sustain the comprehensive school reform effort; and

11. (A) has been found, through scientifically based research to significantly improve the academic achievement of students participating in such program as compared to students in schools who have not participated in such program; or (B) has been found to have strong evidence that such program will significantly improve the academic achievement of participating children.

For more information on the CSR legislation, please see the U.S. Department of Education's web page "About CSR" at <http://www.ed.gov/offices/OESE/compreform/2pager.html>.

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