

Cost of Implementing the Federal No Child Left Behind Act in Connecticut

Local-Level Costs Part II



Connecticut State Department of Education

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CONTENTS

Foreword	iii
Executive Summary	iv
Key Findings	iv
Introduction	1
Methodology	2
Limitations of the Study	3
Characteristics of Participating Districts (2003-2004)	4
Hamden Public Schools	4
Killingly Public Schools	4
New Haven Public Schools	4
Local-Level Findings	5
Hamden Public Schools Cost Analysis Data	9
Killingly Public Schools Cost Analysis Data	10
New Haven Public Schools Cost Analysis Data	11
Federal Revenues Compared with District-Level Costs	12
Conclusion	14
Afterword	15

FOREWORD

“The cost estimates in this report are sobering.” These words began the Foreword to the first part of our report on the *Cost of Implementing the Federal No Child Left Behind Act in Connecticut*, which focused on state-level costs. They are equally applicable, however, to this second part of the report, which highlights costs at the local level.

The three sample districts whose costs are detailed here – Hamden, Killingly and New Haven – represent communities of different sizes, types and socioeconomic characteristics. The backgrounds and needs of their student populations differ. They are the same, however, in that all receive federal funds under Title I (for students in need of academic support) and all have been designated as “in need of improvement” under the No Child Left Behind (NCLB) Act. To be so designated, a school or district must have failed to make “adequate yearly progress” toward 100 percent proficiency by 2013-14 in at least two consecutive years in the same subject.

From January 2002, when NCLB was instituted, through June 2008, estimates based on data provided by these districts show that all three will experience significant differences between federal revenues provided for NCLB activities and local outlays (in staff time and actual dollars) needed to meet NCLB requirements. In Hamden, local costs will exceed federal revenues by \$8.7 million; in Killingly, costs will exceed U.S. funding by \$3.8 million; and in New Haven, costs will be \$10.1 million more than the NCLB funds received from the federal government.

These numbers will require these districts to make some difficult choices. In order to meet specific NCLB requirements (for example, that students in schools “in need of improvement” be allowed to transfer to schools in the district not so designated), will programs designed to help *all* at-risk students have to be curtailed? Will staff members have to be reassigned from other important responsibilities? Will new funding have to be found? What will be done if new funding cannot be found?

Keep in mind that this report focuses on only three representative districts. Not all districts receive Title I funds, so not all will be equally affected by NCLB sanctions. However, it does not take a great leap of logic to conclude that school districts throughout Connecticut are feeling the effects of shortfalls in federal funds provided to them in order to meet the requirements of NCLB. It is equally reasonable to conclude that as the target levels toward 100 percent proficiency rise, more schools and districts will experience the pressure of “AYP” and “in need of improvement” designations and differences between federal funding and actual costs.

We have long said that the goals of NCLB are laudable. Without adequate federal funding, however, a significant burden rests on local districts – and, as Part I of this report showed, on the state – to support much of its implementation. As a result, difficult choices will fall on all of us.

Betty J. Sternberg
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EXECUTIVE SUMMARY

Public Act 04-254 mandated that the secretary of the Office of Policy and Management and the Commissioner of Education or their designees analyze and report the costs associated with compliance with the No Child Left Behind Act of 2001 (NCLB). Pursuant to this mandate, the Connecticut State Department of Education (CSDE) has prepared the NCLB Cost Study. The cost study consists of two parts. Part I of the Study (State-Level Costs) was submitted to the State Board of Education and the General Assembly on March 2, 2005. It indicated a \$41.6 million shortfall in funding at the State level from January 2002 through 2008.

This report is Part II of the cost study, which analyzes the local education agency (LEA) costs for three districts, Hamden, Killingly and New Haven. The districts were asked to volunteer to represent the different types of Education Reference Groups (ERGs). ERGs classify districts with similar enrollments whose students' families are similar in education, income, occupation and need. In general, these districts serve as representatives of the suburban, rural and urban school districts in Connecticut.

The local-level cost study analyzes costs beginning in January 2002, when NCLB was enacted, with projections extending through the 2007-08 school year.

Both cost studies (state and local level) were conducted in conjunction with the nonpartisan Council of Chief State School Officers (CCSSO) and the 12-state NCLB Cost Consortium. The Connecticut State Department of Education developed the research methodology used in the local-level study.

It is important to note that the sample LEAs independently estimated all costs delineated in this report. CSDE provided only the templates and directions for completion of the templates.

Key Findings

- **To meet all the specific requirements of the No Child Left Behind (NCLB) Act, the three sample LEAs will have to commit additional resources in staff time and actual dollar outlay through FY08 as follows:**
 - ✓ **Hamden - \$8.7 million**
 - ✓ **Killingly - \$3.8 million**
 - ✓ **New Haven - \$10.1 million**

The amounts listed below are the difference between the estimates of the costs to the LEAs and applicable funds received from the federal government through CSDE for NCLB purposes.

Participating Districts	Federal Revenues	Local Costs	Funding Difference
Hamden Public Schools	\$7,630,001	\$16,360,354	(\$8,730,353)
Killingly Public Schools	\$4,221,047	\$8,021,812	(\$3,800,765)
New Haven Public Schools	\$139,949,102	\$150,079,694	(\$10,130,592)

- **The most costly requirement of NCLB at the local level is the set of responsibilities related to *Adequate Yearly Progress (AYP)* – [Category 3].**
 - ✓ Hamden - \$6.8 million
 - ✓ Killingly - \$2.7 million
 - ✓ New Haven - \$63.6 million

Under NCLB, all schools and districts are required to make “adequate yearly progress” (AYP) toward 100 percent proficiency by 2013-14, with key benchmarks along the way. To meet and sustain AYP, or to return to AYP status if identified as having failed to make AYP for a given year or years, schools and districts must take specific steps identified by NCLB. These activities include reviewing, analyzing and interpreting student test data for all students and the six subgroups identified by NCLB and disseminating district and school reports to all parents in districts receiving Title I funds. (All three of the study’s sample districts are Title I districts.) In many cases, new staff members must be hired and/or staff members must be reassigned in order to meet AYP responsibilities.

- **The second most costly requirement of NCLB at the local level pertains to *Responsibilities for Districts with Schools Identified for Improvement (Title I and non-Title I) and for Districts Identified for Improvement* – [Category 4]**
 - ✓ Hamden - \$2.3 million
 - ✓ Killingly - \$1.5 million
 - ✓ New Haven - \$33.9 million

Schools and districts that do not make AYP for two consecutive years in the same subject must be designated as “in need of improvement” under NCLB; sanctions increase as the number of years “in need of improvement” increases. The three sample districts are working under this designation. As they move through the NCLB continuum of sanctions, they must develop and implement school and district improvement plans; implement school choice and supplemental educational services within these schools; provide intense intervention; and, if objectives are not met, plan and implement restructuring.

INTRODUCTION

In January 2002, President Bush signed into law the No Child Left Behind Act of 2001 (NCLB), thereby replacing the Improving America's Schools Act of 1994 and reauthorizing the Elementary and Secondary Education Act of 1965.

The stated purpose of NCLB is:

to ensure that all children have a fair, equal, and significant opportunity to obtain a high-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments.

(No Child Left Behind Act of 2001, Title I, Sec. 1001, Statement of Purpose; 20 USC 6301)

NCLB provisions call for higher-quality academic assessments; increased accountability; annual assessments of math and reading/language arts in Grades 3 through 8, adding science beginning in 2007-08; improved teacher preparation and training; strengthened teaching and learning; the alignment of curriculum and instructional materials with challenging academic standards; a closing of the achievement gap; expanded public school choice; and greater opportunities for parental participation in the education of their children. Public schools, districts and states are required to publicly report "adequate yearly progress" (AYP) toward the goal of having all students attain proficiency in reading/language arts and mathematics by the year 2013-14.

In holding schools and districts accountable, local education agencies (LEAs) are required to administer high-quality assessments for the required grades and subjects; provide increasing levels of technical assistance to schools; comply with sanctions when AYP goals are not met within specified timelines; and plan and implement corrective actions aimed at helping ensure that all student subgroup populations, as well as public schools and the local district overall, achieve annual performance targets.

On June 14, 2004, the Connecticut General Assembly passed Public Act No. 04-254, requiring a study of costs associated with NCLB, as follows:

The Secretary of the Office of Policy and Management and the Commissioner of Education, or their designees, shall analyze the costs associated with compliance with mandates imposed by the No Child Left Behind Act, P. L. 107-110. Such analysis shall include an estimate of the costs to the state and local and regional boards of education for such compliance, with appropriated federal funds for such compliance deducted from the cost. The secretary and the commissioner, or their designees, shall, on or before January 1, 2005, report their findings, pursuant to the provisions of section 11-4a of the general statutes, to the joint standing committee of the General Assembly having cognizance of matters relating to education.

(Public Act No. 04-254, An Act Concerning Education Implementer Provisions, Section 1)

This local-level report presents findings in accordance with the study called for in P.A. 04-254. The report examines the cost of the materials and staff time required by each of the participating districts to modify its prior leadership, support and oversight practices to meet the new requirements of NCLB.

The costs reported here are solely those attributable to NCLB. None of the tasks and activities costed out were either required or pursued under Improving America's Schools Act of 1994 (IASA), and none would now have been undertaken of the districts' own volition were it not for NCLB. Had NCLB not come into existence, or had the law contained less specific provisions, these costs would not have been incurred. For example, local districts would not have added additional testing in Grades 3, 5 and 7, but would have continued to test students in Grades 4, 6, 8 and 10 only.

The cost of ongoing functions performed by local personnel in carrying out the policies, programs and special initiatives which would have occurred without the NCLB mandates are not included. The cost of staff time and resources that have been focused on implementing new NCLB responsibilities is the only cost included in this study.

Methodology

The Council of Chief State School Officers (CCSSO) early on recognized the need to devise a common methodology for conducting NCLB cost studies across the nation — an approach that would help resolve the question of adequate federal funding by providing an apolitical research framework within which each state's cost data could be carefully examined. CCSSO contracted with Augenblick, Palaich and Associates (APA), a prominent Denver-based school finance consulting company, to perfect a methodology the firm had already been developing for Hawaii and to provide minimal technical assistance to states and local education agencies (LEAs) wishing to employ that framework. Twelve states, including Connecticut, now belong to the CCSSO NCLB Cost Consortium. (CCSSO requires that the identity of other members remain confidential.) Connecticut is one the first states to produce a report for its legislature, though several more states intend to follow suit over the next few months.

Connecticut State Department of Education staff members reviewed APA's local cost templates and restructured the templates to be less time consuming and more user friendly for the local district personnel participating in the study. Initial Cost Consortium deliberations determined that costs would be collected for the NCLB start-up period of January 2002 through June 2003, but that the focal year of interest would be July 2003 through June 2004, for which sound data could most easily be produced. Projections would be made through fiscal year 2008, recognizing that great care would need to be taken in estimating the ramping up of time/effort and contract expenditures and that, in any event, NCLB provisions could undergo substantial revision during that time. Connecticut examined only the additional costs of NCLB.

The state methodology uses Excel-based cost templates to collect, organize and aggregate costs in nine categories through an activity-based framework. The rationale for an activity-based foundation surrounding categories is this: Requiring activity-based reporting within categories,

contracts and other expenditures minimizes speculation, reduces the incidence of over- or under-reporting of staff time, and facilitates verification or replication of the data. Moreover, this exercise based on activities within a category also can be used as a long-range planning tool, because it clearly identifies which activities have been implemented and are still underway, where additional personnel may be needed and which activities might be consolidated to improve efficiency or maximize program outcomes, etc.

The templates are divided into the following broad categories reflecting the requirements of NCLB:

- Ensure Highly Qualified Staff: Teachers and Paraprofessionals;
- Parent Involvement and Notification;
- Adequate Yearly Progress Responsibilities;
- Responsibilities for Districts with Schools Identified for Improvement (Title I and non-Title I) and for Districts Identified for Improvement;
- Assess English Language Learners (ELLs) for English Language Proficiency/Title III;
- Provide Public School Choice;
- Provide Supplemental Educational Services;
- Curriculum and Assessment; and
- Overall NCLB Requirements.

CSDE personnel generated the list of activities that should be considered in the local cost analysis template based upon Connecticut's federally approved NCLB state consolidated plan and accountability workbook. Local district staff members were then asked to report, to the best of their ability, the costs that were incurred to meet each category's requirements from January 2002 through June 2005 and to project additional costs that will be incurred through June 2008.

Staff time was reported by personnel category. As the data were entered into the specially designed templates, staff work days were translated into full-time equivalents (FTEs). The average cost (wages plus benefits) for each personnel category was entered in the category templates, allowing for the automated costing of meeting NCLB requirements for each category as raw data were entered. The Excel spreadsheets calculated these costs, as well as the annual cost of any contracts associated with the category.

It is important to note that Hamden, Killingly and New Haven, the three sample LEAs, independently estimated all costs delineated in this report. CSDE provided only the templates and directions for completing the templates.

Limitations of the Study

CSDE notes that the local-level NCLB cost study has been conducted with extraordinary thoroughness. However, it is important to stipulate that this study, like most other policy cost studies, necessarily relies both on objective data and professional judgment. The results should therefore be treated as *cost estimates*, not as precise numbers.

Because NCLB implementation continues to evolve with ongoing changes, the results presented here for FY06 and beyond may change considerably by the time the study is updated in subsequent years. Projections of future costs should be accorded less reliability than that attached to figures through FY05, especially inasmuch as some of the out-year projections include new strategies (e.g., additional professional development for staff members or contracted technical assistance) that are yet to be approved by the local boards of education and included in their future budgets.

Characteristics of Participating Districts (2003-04)

The Hamden, Killingly and New Haven school districts were asked to volunteer to participate in the NCLB cost analysis, each representing a different Education Reference Group (ERG). ERGs are designed to classify districts that have similar enrollments and whose students' families are similar in education, income, occupation and need. CSDE has divided Connecticut's school districts into nine ERGs, A through I, with ERG A having the most wealth and ERG I being the most needy.

More specifically, ERG A is the most affluent, with the average income, education level and percentage in managerial or professional occupations all significantly higher than any of the other ERGs. This ERG also has the lowest percentage of single-parent families and has a low percentage of families whose primary language spoken at home is not English.

ERG I is the least affluent of the groups, with median family income significantly lower than any other group. The educational level and percentage in managerial or professional occupations are the lowest of any of the ERGs. This group has the highest percentage of single-parent families and the highest percentage of families whose primary home language is not English.

- Hamden is representative of ERG D. It has an enrollment of 6,397 students in 10 public schools. Approximately 25 percent of Hamden's students are eligible for free or reduced-price meals. Less than two percent of the town's students come from homes where English is not the primary language. Hamden's per capita income (2000) was \$26,039. More than 44 percent of the student body are members of minority groups.
- Killingly (ERG H) has an enrollment of 2,923 students in five public schools. Approximately 36 percent of Killingly's students are eligible for free or reduced-price meals. Approximately five percent of the students come from homes where English is not the primary language. Killingly's per capita income (2000) was \$19,779. Approximately 10 percent of the student body are members of minority groups.
- New Haven is representative of ERG I. It has an enrollment of 20,694 students in 49 public schools. Approximately 67 percent of New Haven's students are eligible for free or reduced-price meals. More than 29 percent of the students come from homes where English is not the primary language. New Haven's per capita income (2000) was \$16,393. More than 89 percent of the students are members of minority groups.

LOCAL-LEVEL FINDINGS

All local-level findings reported in the following pages reflect an activity-based process. Raw data representing time and other costs associated with activities undertaken to implement NCLB were entered into the templates representing nine broad categories. Costs for each category were then electronically aggregated by year.

The templates are categorized by NCLB requirements, the categories described as follows:

- Ensure Highly Qualified Staff: Teachers and Paraprofessionals;
- Parent Involvement and Notification;
- Adequate Yearly Progress Responsibilities;
- Responsibilities for Districts with Schools Identified for Improvement (Title I and non-Title I) and for Districts Identified for Improvement;
- Assess English Language Learners (ELLs) for English Language Proficiency/Title III;
- Provide Public School Choice;
- Provide Supplemental Educational Services;
- Curriculum and Assessment; and
- Overall NCLB Requirements.

Category 1: Ensure Highly Qualified Staff: Teachers and Paraprofessionals category costs include, among other activities, the following:

- identify not highly qualified staff members as required under NCLB;
- enhance staff data systems and maintain data;
- provide professional development to ensure that all staff members become highly qualified;
- implement a High Objective Uniform State Standard of Evaluation (HOUSSE) plan to ensure that all staff members are highly qualified;
- hire only highly qualified (Title I) teachers and paraprofessionals;
- arrange for ParaPro training for paraprofessionals through the RESCs and arrange for the ParaPro exam;
- respond to CSDE data collection regarding status of teachers and paraprofessionals;
- ensure annual written attestation by principals of Title I schools of compliance with highly qualified staff requirements and duties of paraprofessionals;
- provide training for principals, directors and human resource staff members in highly qualified requirements; and
- coordinate entire process of highly qualified requirements.

Category 2: Parent Involvement and Notification category costs include, among other activities, the following:

- develop/revise district and school parental involvement policies/compact (Title I);
- prepare information on teacher/paraprofessional qualifications for parents (Title I schools);

- provide timely notification to parents that students are being taught by not highly qualified staff member(s) for four or more consecutive weeks (Title I schools);
- provide parents of English language learners with information regarding provision of language instruction (Title I/Title III funds) – failure to make progress on annual measurable achievement objectives (Title III);
- design and implement a data management system to track all NCLB requirements related to parents; and
- provide training for parents to become contributing members of the school improvement teams in all schools.

Category 3: Adequate Yearly Progress (AYP) Responsibilities category costs include, among other activities, the following:

- become informed and train staff members in AYP responsibilities;
- review, analyze and interpret student data for all students as well as the six subgroups as required by NCLB;
- develop databases;
- disseminate NCLB district and school reports to all parents in Title I districts;
- hire new staff members and reassign staff members to meet AYP responsibilities;
- meet 95 percent participation rate requirement/ensure attendance of all students during testing window (mailings to parents, etc.); and
- provide make-up test for absent students.

Category 4: Responsibilities for Districts with Schools Identified for Improvement (Title I and non-Title I) and for Districts Identified for Improvement category costs include, among other activities, the following:

- develop/revise school improvement plans and involve constituencies as required by NCLB;
- develop/revise district improvement plans and involve constituencies as required by NCLB;
- hire additional reading and math coaches and mentors for identified schools;
- provide intense technical assistance to identified schools;
- plan for restructuring; and
- implement restructuring in district or identified schools.

Category 5: Assess English Language Learners (ELLs) for English Language Proficiency/Title III category costs include, among other activities, the following:

- identify ELLs;
- identify ELLs exempt from testing (less than one year in a U.S. school);
- annually assess English language proficiency K-12 (Language Assessment Scales);
- attend training on the administration and scoring of these tests as required by NCLB (district test coordinators, directors of English language programs, student assessment office);

- purchase tests from vendors;
- score tests;
- provide accommodations (additional test time, small group/individual administration, test directions read in the native language);
- analyze and report data;
- notify parents (e.g., reasons for identification of their child as limited English proficient [LEP], child's level of English proficiency and method of instruction to be provided, etc.); and
- implement outreach to parents (Title III).

Category 6: Provide Public School Choice category costs include, among other activities, the following:

- become informed about public school choice as required by NCLB (meetings, workshops, training);
- collect, analyze and report data as they relate to public school choice;
- inform parents of their rights regarding public school choice as it relates to NCLB (letters, meetings);
- identify which students request to exercise their choice option and, if demand for choice exceeds available space, place transfers in priority order by considering students' academic and poverty needs;
- identify spaces within district schools for choice candidates;
- work with receiving schools;
- arrange and provide transportation for choice candidates;
- hire additional staff members or reassign staff duties to implement public school choice;
- coordinate and implement public choice program as required by NCLB; and
- respond to CSDE public school choice surveys.

Category 7: Provide Supplemental Educational Services (SES) category costs include, among other activities, the following:

- become informed about all aspects of SES;
- inform parents through letters and meetings of SES availability;
- organize and schedule SES fairs with approved providers;
- prepare agreements with approved providers, including the establishment of measurable objectives for each student;
- identify students who qualify for SES services;
- process participating SES students;
- hire additional staff members or reassign staff duties to coordinate and implement the SES process;
- collect, analyze and report student data to CSDE; and
- provide ongoing monitoring of SES students' progress.

Category 8: Curriculum and Assessment category costs include, among other activities, the following:

- participate in pilot testing of new generation of state assessments in Grades 3, 5, 7 and science;
- expand formative assessment to include Grades 3, 5, 7 and science;
- provide training in assessment requirements for Grades 3, 5, 7 and science;
- implement new testing requirements for students with disabilities and arrange for testing of these students with expanded accommodations;
- develop curriculum which reflects the CSDE grade-level standards required by NCLB; and
- provide training on grade-level standards in reading, writing, mathematics and science.

Category 9: Overall NCLB Requirements category costs include, among other activities, the following:

- provide professional development for staff members on NCLB requirements;
- upgrade information collection devices and student data management systems;
- design and implement new data management systems to track schools as they progress through the NCLB continuum;
- complete consolidated application and address goals and performance indicators;
- collect and report data and provide student records and transcripts, including suspension and expulsion information, to transfer schools for Title IV, Part A, Subpart 3 – gun-free requirements;
- provide professional development and develop programs for Title II, Part D – Subpart 1 – Enhancing Education Through Technology;
- develop a technology plan reflective of NCLB mandates;
- ensure nonpublic participation through ongoing meetings; and
- implement NCLB evaluation requirements as required by CSDE.

Figures automatically generated by the templates are precise at the dollar level. Despite meticulous efforts, however, the nature of the data is itself imprecise, because staff members are required to decipher their overall activities in order to determine which parts are directly related to NCLB and which are not.

Hamden Public Schools Cost Analysis Data As Required Under NCLB

Category	01/01/02	07/01/02	07/01/03	07/01/04	07/01/05	07/01/06	07/01/07	Cost Over Time
	– 06/30/02	– 06/30/03	– 06/30/04	– 06/30/05	– 06/30/06	– 06/30/07	– 06/30/08	
Category 1: Ensure Highly Qualified Staff-Teachers and Paraprofessionals	\$19,500	\$39,900	\$30,674	\$37,721	\$44,195	\$45,263	\$46,357	\$263,610
Category 2: Parent Involvement and Notification	\$51,345	\$129,917	\$175,780	\$422,948	\$438,827	\$458,383	\$477,613	\$2,154,813
Category 3: Adequate Yearly Progress Responsibilities	\$383,538	\$455,979	\$550,568	\$740,769	\$1,350,852	\$1,568,098	\$1,753,747	\$6,803,551
Category 4: Responsibilities for Districts with Schools Identified for Improvement (Title I and non-Title I) and for Districts Identified for Improvement	\$2,573	\$5,568	\$6,184	\$525,459	\$541,455	\$518,665	\$676,455	\$2,276,359
Category 5: Assess ELLs for English Language Proficiency/Title III	\$75,396	\$142,749	\$150,592	\$154,549	\$159,622	\$164,262	\$169,254	\$1,016,424
Category 6: Provide Public School Choice	\$0	\$0	\$0	\$0	\$170,958	\$184,837	\$205,731	\$561,526
Category 7: Provide Supplemental Educational Services	\$0	\$0	\$0	\$0	\$37,352	\$167,038	\$172,038	\$376,428
Category 8: Curriculum and Assessment	\$88,962	\$131,344	\$138,015	\$180,004	\$521,971	\$528,051	\$490,694	\$2,079,041
Category 9: Overall NCLB Requirements	\$11,370	\$54,123	\$97,084	\$151,459	\$176,662	\$167,480	\$170,424	\$828,602
TOTAL	\$632,684	\$959,580	\$1,148,897	\$2,212,909	\$3,441,894	\$3,802,077	\$4,162,313	\$16,360,354

**Killingly Public Schools Cost Analysis Data
As Required Under NCLB**

Category	01/01/02 – 06/30/02	07/01/02 – 06/30/03	07/01/03 – 06/30/04	07/01/04 – 06/30/05	07/01/05 – 06/30/06	07/01/06 – 06/30/07	07/01/07 – 06/30/08	Cost Over Time
Category 1: Ensure Highly Qualified Staff-Teachers and Paraprofessionals	\$1,243	\$8,938	\$6,620	\$10,360	\$136,589	\$132,700	\$133,242	\$429,692
Category 2: Parent Involvement and Notification	\$20,603	\$75,381	\$80,082	\$80,592	\$81,902	\$81,902	\$81,902	\$502,364
Category 3: Adequate Yearly Progress Responsibilities	\$25,432	\$301,296	\$297,596	\$313,423	\$574,273	\$554,273	\$604,273	\$2,670,566
Category 4: Responsibilities for Districts with Schools Identified for Improvement (Title I and non-Title I) and for Districts Identified for Improvement	\$0	\$0	\$0	\$323,899	\$319,143	\$416,005	\$490,295	\$1,549,342
Category 5: Assess ELLs for English Language Proficiency/Title III	\$8,184	\$41,333	\$52,820	\$57,117	\$61,991	\$61,991	\$61,991	\$345,427
Category 6: Provide Public School Choice	\$0	\$0	\$1,124	\$1,666	\$16,382	\$53,606	\$68,003	\$140,781
Category 7: Provide Supplemental Educational Services	\$0	\$0	\$1,666	\$2,248	\$6,228	\$112,261	\$136,324	\$258,727
Category 8: Curriculum and Assessment	\$0	\$5,470	\$112,142	\$251,525	\$253,502	\$253,502	\$253,502	\$1,129,643
Category 9: Overall NCLB Requirements	\$28,116	\$116,127	\$174,790	\$174,211	\$167,342	\$167,342	\$167,342	\$995,270
TOTAL	\$83,578	\$548,545	\$726,840	\$1,215,041	\$1,617,352	\$1,833,582	\$1,996,874	\$8,021,812

**New Haven Public Schools Cost Analysis Data
As Required Under NCLB**

Category	01/01/02 – 06/30/02	07/01/02 – 06/30/03	07/01/03 – 06/30/04	07/01/04 – 06/30/05	07/01/05 – 06/30/06	07/01/06 – 06/30/07	07/01/07 – 06/30/08	Cost Over Time
Category 1: Ensure Highly Qualified Staff-Teachers and Paraprofessionals	\$147,587	\$610,357	\$1,432,475	\$1,400,924	\$1,428,782	\$1,011,969	\$1,057,460	\$7,089,554
Category 2: Parent Involvement and Notification	\$592,432	\$1,082,309	\$1,204,213	\$1,279,678	\$1,343,088	\$1,402,930	\$1,457,363	\$8,362,013
Category 3: Adequate Yearly Progress Responsibilities	\$1,138,830	\$9,094,940	\$9,826,703	\$10,217,697	\$10,722,587	\$11,116,259	\$11,519,169	\$63,636,185
Category 4: Responsibilities for Districts with Schools Identified for Improvement (Title I and non-Title I) and for Districts Identified for Improvement	\$135,410	\$306,029	\$502,285	\$945,439	\$8,288,241	\$10,758,139	\$13,005,160	\$33,940,703
Category 5: Assess ELLs for English Language Proficiency/Title III	\$71,722	\$333,820	\$558,094	\$680,474	\$857,361	\$905,819	\$954,316	\$4,361,606
Category 6: Provide Public School Choice	\$0	\$28,012	\$450,776	\$495,081	\$538,626	\$582,254	\$613,721	\$2,708,470
Category 7: Provide Supplemental Educational Services	\$6,335	\$601,860	\$1,450,378	\$1,010,715	\$3,393,604	\$3,554,405	\$3,723,598	\$13,740,895
Category 8: Curriculum and Assessment	\$630,566	\$1,484,433	\$1,884,547	\$2,145,352	\$2,477,228	\$2,633,040	\$2,814,211	\$14,069,377
Category 9: Overall NCLB Requirements	\$6,576	\$43,931	\$362,226	\$399,394	\$426,123	\$452,903	\$479,738	\$2,170,891
TOTAL	\$2,729,458	\$13,585,691	\$17,671,697	\$18,574,754	\$29,475,640	\$32,417,718	\$35,624,736	\$150,079,694

The preceding pages provide estimates pertaining to NCLB local-level costs for three districts (Hamden, Killingly and New Haven). Those costs now must be compared with applicable

federal revenues. It is estimated that the local-level costs for the NCLB mandates will exceed the applicable federal funding by increasing amounts.

**FEDERAL REVENUES
COMPARED WITH
DISTRICT-LEVEL COSTS AS REQUIRED BY NCLB**

DISTRICT	FEDERAL REVENUES							DISTRICT REVENUE OVER TIME
	01/01/02	07/01/02	07/01/03	07/01/04	07/01/05	07/01/06	07/01/07	
	—	—	—	—	—	—	—	
	06/30/02	06/30/03	06/30/04	06/30/05	06/30/06	06/30/07	06/30/08	
Hamden Public Schools	\$702,029	\$830,808	\$1,190,040	\$1,226,781	\$1,226,781	\$1,226,781	\$1,226,781	\$7,630,001
Killingly Public Schools	\$453,880	\$701,163	\$696,124	\$658,095	\$620,595	\$583,095	\$508,095	\$4,221,047
New Haven Public Schools	\$15,352,414	\$20,109,585	\$21,093,687	\$20,948,570	\$20,948,570	\$20,848,572	\$20,647,704	\$139,949,102

DISTRICT	LOCAL-LEVEL COSTS AS REQUIRED BY NCLB							DISTRICT COST OVER TIME
	01/01-02	07/01/02	07/01/03	07/01/04	07/01/05	07/01/06	07/01/07	
	—	—	—	—	—	—	—	
	06/30/02	06/30/03	06/30/04	06/30/05	06/30/06	06/30/07	06/30/08	
Hamden Public Schools	\$632,684	\$959,580	\$1,148,897	\$2,212,909	\$3,441,894	\$3,802,077	\$4,162,313	\$16,360,354
Killingly Public Schools	\$83,578	\$548,545	\$726,840	\$1,215,041	\$1,617,352	\$1,833,582	\$1,996,874	\$8,021,812
New Haven Public Schools	\$2,729,458	\$13,585,691	\$17,671,697	\$18,574,754	\$29,475,640	\$32,417,718	\$35,624,736	\$150,079,694

The first issue districts must deal with is the difference between the cost of NCLB mandates and federal funding for them (shortfalls of \$8.7 million for Hamden, \$3.8 million for Killingly and

\$10.1 million for New Haven). The next issue is that districts are currently spending the applicable federal money in support of activities that bolster the academic success of disadvantaged children across their districts and not necessarily on the targeted requirements of NCLB. In New Haven, for example, Title I funds currently are spent across all Title I schools in the city – not just those “in need of improvement” – on expenditures such as personnel and materials for math and reading programs. If a significant percentage of those dollars must be focused on a specific subset of schools and students for specific, NCLB-required activities, the district will have to decide how to use the resources it has to meet that mandate. Does it take resources away from existing programs designed to support all students in need – and keep additional schools from being named as “in need of improvement?” Does it try to find additional funds to continue its existing programs undiminished while meeting NCLB requirements? What if additional funds cannot be found?

CONCLUSION

This local-level study excludes all locally supported interventions, local competitive grant initiatives and other programs that are not directly essential to complying with NCLB mandates. In doing so, the cost study presents a clear estimate of the impact of NCLB on local education agency operations. The resulting cost figures are the carefully tabulated cost of new activities such as additional assessments, record-keeping and intense intervention in schools identified as “in need of improvement” initiated at the local level solely for the purpose of complying with NCLB mandates.

Given the overall differences in levels of funding and costs to the LEAs – especially those identified in Categories 3 and 4 in this report – it is clear that NCLB is underfunded at the local district level. This underfunding requires districts to make difficult decisions: Do they take resources away from programs that support all students in need and that may prevent other schools from being designated “in need of improvement?” Do they find additional funds to continue existing programs without reductions while meeting NCLB’s specific, focused requirements? What do they do if they cannot find additional funds – which programs, services or personnel do they redirect and/or eliminate?

AFTERWORD

Educators in local school districts constantly make decisions about the best ways to serve their students – always focusing on the goal of improving student achievement. State educational leadership at the State Department of Education and the State Board of Education, supported by the legislature and the Governor in their policymaking and funding roles, share this focus. We understand that the No Child Left Behind Act, at its core, seeks the same goal. In practice, however, NCLB creates too many challenges for the State of Connecticut and its local school districts to leave *unchallenged*.

Hamden, Killingly and New Haven, which represent three different Education Reference Groups, will experience an estimated combined total shortfall in federal funding for required NCLB responsibilities of \$22.6 million through June 2008. While it is not appropriate to overstate the significance of differences between local outlays (in staff time and actual dollars) and federal funding, it is appropriate to think about what this estimate might mean statewide. And it means that there is a substantial drain on local resources that could otherwise be directed to programs which local districts have determined are most helpful to their students. We have said the same thing about state resources for education; that, for example, the dollars spent on adding tests in Grades 3, 5 and 7, as required by NCLB, would be much better spent on programs (such as preschool for all disadvantaged 3- and 4-year-olds) that have been proven to improve student achievement.

The disconnect between the goals of NCLB and its implementation, including funding levels, is troubling. So is an apparent disrespect for the judgment of Connecticut educators, board members and others in the state and local communities who know their students best.

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