

# **Rural Districts Left Behind? Rural Districts and the Challenges of Administering the Elementary and Secondary Education Act**

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*The purpose of this study was to inform the upcoming and overdue reauthorization of the Elementary and Secondary Education Act (ESEA) by exploring whether rural school districts face disadvantages as they attempt to follow the law's provisions and, if so, if the law's rural-specific section ameliorates these disadvantages. The research drew upon interviews and survey results from rural Colorado as well as from a comparison group of non-rural school districts in the state. The findings suggest that rural districts are indeed uniquely administratively disadvantaged when it comes to the law. However, they also share certain challenges with their non-rural counterparts. The article concludes with policy recommendations that address challenges experienced by districts across the rural-urban continuum as well as challenges that are specific to the rural context.*

From Interstate Highway 70, Strasburg, Colorado is little more than a dry speck in the high desert that stretches between Denver and Topeka. Take Exit 310, and you will find the classic hallmarks of rural, Western America: the sandy landscape; the main street, nearly as wide as it is long; the three small schools, one elementary, one middle, and one high. Strasburg, it would seem, would be an ideal candidate for the Rural Education Achievement Program (REAP), which was added to the Elementary and Secondary Education Act (ESEA) in 2002 with the specific intent of making the nation's main federal education law

more accessible and useful for school districts in rural communities.

Yet according to the U.S. Department of Education (US DOE), as rural as Strasburg may appear to be, the town is not rural enough. As of the 2012-13 school year, the district served 1,000 students, too many to qualify for REAP's Small Rural School Achievement (SRSA) grants. And while the district's child poverty rate has exploded in the past decade, doubling to 23% in 2012-13, the community's overall poverty rate is less than 10%, which was too low to qualify Strasburg that year for REAP's other funding stream, the Rural Low-Income School Program (RLIS).

The Strasburg situation is just one example of the types of challenges that rural districts face as they navigate the regulations attached to ESEA's latest iteration, known as the No Child Left Behind (NCLB) Act of 2001. In 2011, the U.S. Department of Education introduced waivers designed in part to make NCLB less onerous to follow. More than 40 states currently have waivers, but these waivers apply to a limited number of provisions of the wide-reaching law. This study explores how rural districts in one state, Colorado, navigate the administrative challenges of managing financial provisions of the law that have remained largely untouched by the waivers.

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## Background

Past research suggests a disconnect between the design and requirements of ESEA and the realities of rural education (Edmondson & Shannon, 2003; Eppley, 2009; Jimerson, 2005). However, when it comes to NCLB, research on rural schools has mainly focused on two provisions of the statute: the Highly Qualified Teachers (HQT) requirements (which set standards for public school educators) and the mandate that schools make Adequate Yearly Progress (AYP) toward 100% proficiency by 2014. Since these topics have been and continue to be examined in depth, we do not address them in this article. Rather, we focus instead on more general administrative challenges that educators who participated in our study identified as being particularly salient.

When it comes to rural-specific challenges unrelated to accountability or teacher qualifications, past research has addressed a small handful of issues. One of these issues is supplemental educational services, tutoring offered to students at higher poverty schools that miss making adequate progress for three or more consecutive years. Supplemental educational services are required under Title I, ESEA's main and most well-funded provision, which aims to improve the achievement of disadvantaged students. The services are provided outside of school hours at no cost to students, and parents select the tutors. Although school districts are permitted to offer these services, outside organizations (for-profit and non-profit) provide most of the tutoring (Deke, Dragoset, Bogen, Gill, & Sekino, 2012). Supplemental educational services requirements have been eliminated in most of the states that have received ESEA waivers since 2012. However, Colorado's State Board of Education elected to maintain the requirement, with some changes, such as reducing the percentage of ESEA funds that districts must set aside each year when at least one school is required to offer families the option of supplemental educational services.<sup>1</sup>

Studies have identified numerous barriers to the provision of tutoring in rural areas. One barrier is that providers may find it unprofitable to offer in-person services in remote areas, limiting parents' options. Rural parents may also hesitate to trust outsiders with their children (Barley & Wegner, 2007, 2010; Reeves, 2003). Online-only services are a possibility, but the low-income families who are eligible for tutoring may lack computers or Internet access, which can be spotty in rural areas. Even if providers offer services on school computers, transportation can be a challenge since the tutoring is voluntary and occurs outside school hours. Such arrangements could require the addition

of new school bus routes for students who opt to stay late for extra help (Barley & Wegner, 2007).

Past research has also identified Title I's funding formula as a challenge for rural districts. Strange, Johnson, and Finical (2009) found that Pennsylvania districts that enrolled large numbers of students often received more per-pupil funding from Title I than districts with smaller enrollments, even when the smaller districts had higher poverty rates. When they aggregated total Title I funding for multiple small districts, they found that it was often less than total Title I funding for a single large district with an enrollment equal to that of the combined enrollment of the smaller districts. Strange, Johnson, and Finical concluded that such distribution of funds disadvantaged rural districts because they tended to be small.

A final set of studies address REAP, which was added to ESEA in 2002. REAP, found in Title VI of ESEA, is the first operational ESEA program that targets rural schools (Reeves, 2003). REAP aims to address two major challenges thought to disadvantage rural school districts. First, rural schools often "lack the personnel and resources needed to compete effectively for Federal competitive grants." (No Child Left Behind Act of 2001, Section 6202). Second, for rural districts, total ESEA allocations are often "too small to be effective in meeting their intended purposes" (No Child Left Behind Act of 2001, Section 6202).

REAP has two parts: RLIS and SRSA. Any school district that is eligible for one of the programs is ineligible for the other. SRSA has two subparts: REAP-Flex and the SRSA Grant Program (see Table 1). In 2011, about \$86 million was allocated for the grants, which flow directly from the US DOE to about 4,000 local school districts (Apling, 2007; U.S. Department of Education, 2011) Grants range in size from \$20,000 to \$60,000 per district.

Evidence suggests that these grants have helped to fulfill the statute's goal of addressing the issue of ESEA's funding allocations that are too small to meet the law's objectives (Apling, 2007). SRSA grants supplement local rural school districts' funding from four NCLB programs. Without SRSA funds, the median eligible rural district received \$19,700 from these four programs in 2003, as compared to \$42,300 for the median non-eligible district. The median SRSA grant was about \$20,000. The resulting funds, a total of \$39,700, was nearly enough to bring eligible districts to the median funding level for non-eligible districts (Apling, 2007).

REAP-Flex is the second component of SRSA. It is not a funding source. Rather, it is a program that permits rural districts to use other sources of ESEA funding (e.g., Title I funds) more flexibly. Just over half of eligible districts used REAP-Flex in 2006 (Christensen, Amerikaner, Klasik, & Cohodes, 2007). Districts that did not participate in

<sup>1</sup>Other waiver states that have maintained some aspect of supplemental services and/or choice include Florida and South Carolina.

the program typically reported that they had insufficient information about it. States played a key role in disseminating information and encouraging districts to apply.

REAP-Flex was most often used to supplement services provided under Title I, Part A, which is generally the section of the law that provides the largest pool of ESEA funding for individual school districts. Often, the flexibility helped to maintain Title I programs after local budget reductions. Rural districts that used REAP-Flexibility were more likely than those that did not to prioritize elementary school students and the core subjects of math and English language arts (Christensen, 2007).

REAP’s second program, the RLIS Program, is intended to provide financial assistance to lower-income rural districts

that are not eligible for the SRSA Grant Program and REAP-Flex (Table 1). State education agencies generally apply for and then distribute the funds. If a state does not participate, awards are issued by the US DOE. Not all local districts that are eligible for the program receive a grant, especially in states in which the state agency chooses to award sub-grants on a competitive basis. In 2011, more than \$87 million was appropriated for RLIS (U.S. Department of Education, 2011). This funding was divided among about 1,200 local districts (Apling, 2007).

As with SRSA grants, RLIS funds were most often used to support activities authorized under Title I, Part A. The program also frequently funded educational technology and teacher training (Magill, Hallberg, Hinojosa, & Reeves.,

Table 1

*The Rural Education Achievement Program: Eligibility Criteria and Permitted Uses of Funds*

Subpart	Eligibility Criteria	Permitted Uses <sup>a</sup>
Small Rural School Achievement		
Small Rural School Achievement Grants		
	Average daily attendance < 600 students or population density < 10 per square mile for all schools Locale code of 7 or 8 <sup>b</sup> or state defines area as rural	Augment activities permitted by ESEA: Title II, A Title II, D <sup>c</sup> Title IV, A <sup>c</sup> Title V, A
REAP-Flex		
	Same as Small Rural School Achievement Grants	Flexibility to use ESEA funds to augment: Title I, A Title II, A Title II, D <sup>c</sup> Title III Title IV <sup>c</sup> Title IV, B Title V, A
Rural Low-Income Schools		
	Ineligible for Small Rural School Achievement Poverty rate at least 20% Locale codes of 6,7 or 8 <sup>b</sup>	Teacher recruitment, retention (e.g. bonuses) Teacher training Educational technology (software, hardware) Parental involvement Activities authorized by ESEA Titles: IV, A <sup>c</sup> I, A III

Note. <sup>a</sup> Title I, A = Disadvantaged Children; Title II, A = Improving Educator Quality; Title II D = Educational technology; Title III = English learners and immigrant students; Title IV, A = Safe and drug-free schools; Title V, A = Innovative programs. <sup>b</sup>

2010). Between 2003 and 2008, the rate of academic improvement in mathematics and reading for districts that received RLIS funding was significantly greater than for rural districts that did not receive the funds (Magill et al., 2010).

### Study Objectives and Theoretical Framework

This study bridges several gaps in the current literature on ESEA. First, as previously described, studies of NCLB and rural areas largely focused on two aspects of the law: accountability and teacher quality. To concentrate on addressing gaps in the literature, this study avoids these topics, focusing instead on four areas that the members of the educator panel that advised our study (see Data Sources, below) found to be particularly problematic for administering funding from the law: Title I (education for disadvantaged students), Title IIA (educator preparation, training, and recruitment), Title III (English learners and immigrant students), and REAP (rural schools). In addition to filling gaps in the ESEA literature, this study also provides a timely update on NCLB and rural education. Much extant research on rural districts and the administration of NCLB was conducted in the very early years of the law, meaning that school officials were often speculating about potential consequences rather than reporting on the realities of implementation. The final motivation for this study is that little if any academic research has examined district-level implementation of rural-specific aspects of NCLB (i.e., REAP).

The framework for this study is informed by Pawson and Tilley's (2004) conception of what they call realist evaluation. Realistic evaluation treats public policy programs such as ESEA as "theories incarnate" in that the interventions that the programs embrace assume that specific causes "underpin and account for present problems" (Pawson & Tilley, 2004, p. 3). The goal of realistic evaluation is to determine whether or not a program—in this case, NCLB—has functioned according to its own "vision of change" (Pawson & Tilley, 2004, p.2). According to Pawson and Tilley, realistic evaluation employs techniques of the natural sciences to the analysis of policy and programs: The goal is to use programs' theories of change as hypotheses to be tested. Similar approaches have been found in "every social science discipline" (Pawson & Tilley, 2004, p. 10), including psychology (Greenwood, 1994), economics (Lawson, 1997), and sociology (Archer, 1995; Pawson & Tilley, 2004).

What is ESEA's "vision of change" vis-à-vis rural schools? While ESEA's reach has expanded in recent years to virtually every school in the United States, we suggest that the program's funding mechanisms continue to be driven by the "compensatory" theories of education that

dominated the Great Society era and in turn gave rise to the original 1965 law. Compensatory models posit that equality of educational opportunity entails allotting to some individuals more resources than others based upon their needs, interests, and capabilities (Howe, 1993). Pursuant to this model, most NCLB programs target supplemental federal funds to specific subgroups believed to have different (and greater) needs. Even NCLB's broadly-applied accountability measures highlight the performance of subgroups, including low-income students, special-needs students, and racial and ethnic minorities. The idea is that the additional resources and attention to these subgroups will compensate for their "disadvantages."

With the addition of REAP in 2002, ESEA in a sense turned rural school districts into a subgroup to be compensated. Yet rather than portraying them as academically disadvantaged, the statute describes rural schools as *administratively* disadvantaged in that they lack resources to compete for federal grants and often receive total allocations that are inadequate to meet their intended purposes. Pursuant to our realistic evaluation model, our study assesses NCLB against the yardstick of its own incarnate theory—that rural districts are administratively disadvantaged—by examining the perceptions of those closest to the ground, the rural administrators themselves. Therefore, our research questions are:

1. Compared to administrators in non-rural districts, how, if at all, do administrators in rural districts perceive themselves to be *administratively* disadvantaged?
2. If rural districts are indeed perceived to be administratively disadvantaged when it comes to administering ESEA, to what extent do administrators perceive that REAP addresses these disadvantages?

### Methodology

#### Setting

Colorado is in many ways a microcosm of national educational trends. The state's K-12 student population has grown every year since 1990, increasing by more than 40% between 1990 and 2012. However, this population influx has not been evenly distributed. The school districts in the cities of the Front Range Corridor (Denver, Fort Collins, and Colorado Springs) are among the fastest growing in the nation. As such, they mirror other high-growth areas in the nation's Sunbelt and Western states. The largest districts, Jefferson County and Denver, enroll upwards of 80,000 students apiece.

Of Colorado's 178 school districts, however, 109 have fewer than 1,000 students and collectively cover more than

half the state. The administrative capacities of Colorado's school districts are extremely varied, ranging from large, central offices in metro-area districts to just two or three employees in poor, isolated districts. This fact, combined with the state's embrace of "local control," means that districts face very different types of challenges as they administer ESEA.

In a more extreme version of the national trend, the number of English learners in Colorado has grown more than 260% since 1995. An additional demographic trend is that the percentage of Colorado children living in poverty more than doubled between 2000 and 2011, compared with a 34% increase nationwide over the same period. This development has occurred despite the fact that Colorado is a relatively wealthy state, ranking 15<sup>th</sup> for per capita personal income nationally. As has been the case in many areas of the nation, the sharp increases in enrollment, poverty, and English learners has strained state and local district budgets—especially with the dramatic decline in revenue that accompanied and followed the 2008 recession. Although education funding in Colorado has some state constitutional protection, during the most recent recession, the state cut the education budget by 16%, not including capital and local supplemental property tax measures.

When Colorado received one of the first waivers in January 2012, it had already begun a number of reforms aligned with the Obama administration's ESEA Blueprint for Reform (U.S. Department of Education, 2010). The waiver permits the state to use its longitudinal growth model and school and district performance frameworks as NCLB accountability measures. However, as is currently the case in many waiver states, the federal requirements do not perfectly align with the state system of accountability. For example, in 2010, the state legislature passed a law that required at least 50% of annual teacher and principal evaluations to be based on student performance. The passage of such laws was a precondition for receiving the ESEA waivers. However, Colorado is still subject to the much more minimal Highly Qualified Teacher requirements of NCLB.

### Data Sources

This study draws upon two major data sources: interviews with educational administrators and a statewide survey of Colorado administrators. In addition, the study was shaped by an advisory committee of 16 Colorado stakeholders representing local school districts, regional agencies, the Colorado Department of Education (CDE), and the Colorado League of Charter Schools. Participants included superintendents, financial officers, and federal program managers. The committee members, who participated in three 90-minute meetings, included urban,

suburban, and rural experts on federal education programs. Members helped to select topics for interview and survey questions, served as interviewees, and triangulated findings by viewing and commenting on drafts of this article. As such, they served as de facto co-investigators, informants, and reviewers.

### Statewide Survey

Based on advisory committee input and a review of the extant literature, we created a 60-question online survey for school officials in Colorado who were responsible in some way for administering ESEA. The objective of this survey was to compare how rural and non-rural school officials perceived, administered, and implemented ESEA. To facilitate this rural-non-rural comparison, respondents were asked to identify their school districts using the CDE classifications of Denver Metro, Urban-Suburban, Outlying City, Outlying Town, or Rural. We classified respondents as "rural" if they selected the rural, outlying town, or outlying city option. We considered respondents non-rural if they selected the remaining options.<sup>2</sup> In addition to being questioned about the geographic settings of their districts, respondents were also asked to provide other basic information related to their local education agencies and federal funding.

The survey consisted of open-ended and multiple-choice questions about six major components of ESEA that were identified from committee members' input: Title I, Part A (education for the disadvantaged); Title I, Part D (neglected, delinquent, or at-risk youth); Title II, Part A (educator training, preparation, and recruitment); Title III (English Language Acquisition); Title III, Part A (immigrant students); and REAP (rural schools). The questions are listed in Table 2.

Title I, A got relatively more attention on the survey because it has more funding attached to it than does any other section of ESEA. We asked survey respondents to rate seven aspects of Title I, A on a six-point Likert-like scale that ranged from "extremely beneficial" to "extremely problematic." Respondents were also asked to use a four-point Likert-like scale to rate the importance of federal funds to five broad areas: closing achievement gaps, English language development, improving teacher quality, providing evidence-based programs, and practices to improve student outcomes and turning around low-achieving schools.

We sent e-mails containing survey links to 469 unique e-mail addresses. We obtained these addresses from the state education department's list of individuals responsible for

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<sup>2</sup>Outlying City and Outlying Town districts likely differ in some ways from Rural districts. However, these categories elicited too few respondents to consider on their own and seemed more akin to rural districts than to urban ones.

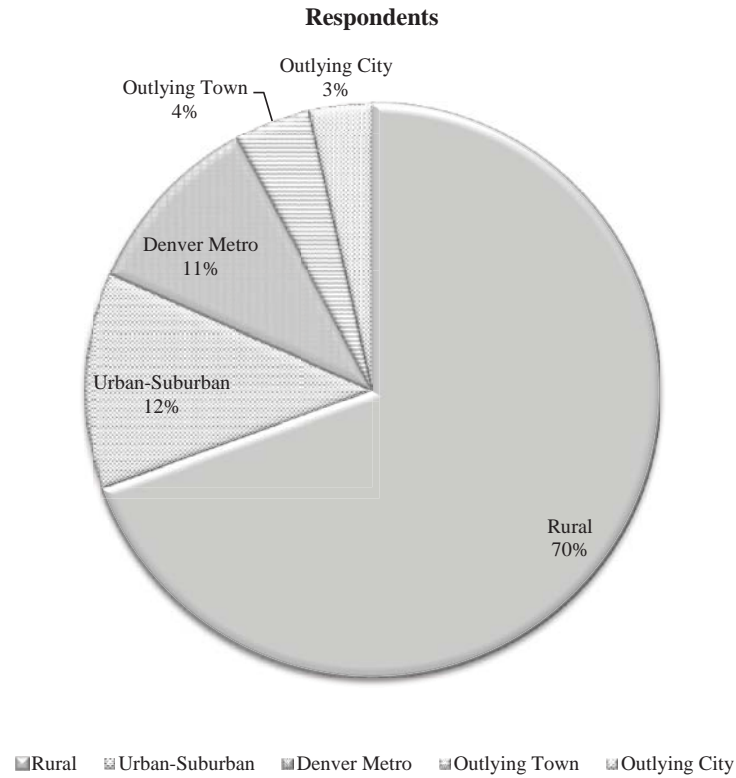


Figure 1. Percent of survey respondents by geographic setting of school district.

Table 2

Survey Questions About Title I, A and D; Title II, A; Title III, A; and Title VI, A

Question	Possible Responses
Does your district receive Title [?] funds?	Yes, No
Does a BOCES provide administrative support for your district’s Title X funding? <sup>a</sup>	Yes, No, Don’t Know
Based on Title X allowable uses, please give examples of how your district uses this funding.	Open-ended, up to three examples
Thinking of student outcomes in your district, please describe features of Title X that you believe to be most helpful in improving your students’ outcomes.	Open-ended, up to two examples
Thinking of student outcomes in your district, please describe features of Title X that you believe are barriers to helping improve your students’ outcomes.	Open-ended, up to two examples
Do you have any recommendations for reforming Title X so that it better serves the students’ in your district? Please explain.	Open-ended

Note. <sup>a</sup> = This question was only asked for Title I, A; Title II, A; and Title III, A.

overseeing ESEA implementation in their local education agencies. We also sent the survey to all the state's school superintendents.<sup>3</sup> The survey was available for eight business days, from January 23, 2013, to February 4, 2013. We sent one reminder. Of the 469 individuals contacted, 148 (32%) responded to one or more survey questions.

Based on our interviews and committee input, we analyzed the survey as a whole and compared rural and non-rural districts. We generated descriptive statistics for multiple choice responses. We also conducted post hoc significance testing to better understand which rural/non-rural differences were most substantial.

We coded the survey's open-ended responses inductively, from the bottom up. For each question, we read the entire body of responses multiple times to generate a coding rubric. The goal was to categorize responses in such a way to create frequency tables. These tables helped us to distinguish between common responses that were applicable to multiple districts and interesting but perhaps idiosyncratic answers that were specific to a particular district or respondent. Once these frequency tables were complete, we compared rural and non-rural responses. We then used the survey findings to follow up on and clarify the survey findings.

## Interviews

To follow up on survey findings, we conducted 11 semi-structured interviews that lasted one to two hours each. Since our survey revealed stark differences in the challenges faced by urban/suburban and rural districts, we purposively selected seven interviewees from our advisory committee with an eye toward representing both the urban/

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<sup>3</sup>A caveat is that some school districts were represented by more than one survey respondent. For instance, a superintendent and a Title I coordinator from the same district could each have received a copy of the survey and, in some instances, both responded. Since the survey was anonymous unless respondents chose to disclose their contact information after viewing all the questions, it is not possible to quantify the amount of duplication. (Only a quarter of respondents chose to disclose contact information.) However, it is certain that larger districts, all of which were urban or suburban, were more likely to be represented by two or more respondents. In smaller districts, which are more likely to be rural, one respondent, either the superintendent or a single administrative designee with responsibility for ESEA funds, completed the survey. Since more than 80% of Colorado students are enrolled in larger urban and suburban school districts along the Front Range, this situation is not as problematic as it would have been if small districts had been represented by multiple respondents. Further, although individual rural districts are smaller than individual urban districts, Colorado has a lot more rural districts than urban districts. As a result, 70% of survey respondents were rural. However, because of the issue of district duplication, survey results are discussed in terms of percentage and number of respondents, not districts.

suburban and rural perspectives. An additional finding from the survey was that ESEA provisions often appeared to be interpreted differently at the local and national levels, sometimes to the point that we, as researchers, were uncertain whether the challenges that districts said they faced stemmed from ESEA and its attendant administrative guidance or from state administrators' interpretations and misinterpretations of the law and its federal guidance documents.<sup>4</sup> For this reason, we interviewed four officials at the CDE and five officials from the US DOE. These interviews focused on trying to reconcile how and why the state and federal perspectives did not always match.

Once we had completed all our interviews, we coded them to the same set of categories developed during survey coding and also to additional categories that arose. We then coded these categories to the research questions to identify what if any administrative challenges were rural-specific and how, if at all, REAP ameliorated these challenges.

## Results

To determine whether rural districts were administratively challenged above and beyond their non-rural counterparts when administering ESEA, it was first necessary to identify what if any challenges were shared by rural and non-rural districts. After all, if rural and non-rural districts faced the exact same set of challenges and the same levels of frustration with these challenges, it would be difficult to argue that rural districts are truly administratively disadvantaged. These shared challenges are briefly described in the following section. We then delineate rural-specific challenges and the ways in which these challenges are addressed (or not addressed) by REAP.

### Shared Challenges: Urban-Suburban and Rural School Districts

For rural and non-rural districts, there were no significant differences between three main categories of challenges related to ESEA administration. These shared challenges included supplemental educational services, supplement-not-supplant rules (which require districts to use ESEA funds to augment, not backfill or replace, state and local funds), and general reporting and compliance requirements.

More than 80% of respondents found supplemental educational services to be problematic, making the measure the most frustrating overall ESEA element included on the survey. In interviews and in open-ended survey responses,

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<sup>4</sup>Although there was also miscommunication between the state and the districts, we found that it was more readily reconciled since state and district officials had much more contact than did state and federal officials.

local school officials said that they thought that supplemental services vendors charged too much money for services that too rarely increased student achievement. According to a CDE-commissioned evaluation, supplemental services providers charged \$11 to \$97 per hour, per student in 2011 (Brock, Wass, Fox, Finlay, & Gallagher, 2012). Colorado does eliminate providers from the state-approved list if their students do not outperform a control group on state assessments. However, it takes several years of inadequate performance before a provider is removed.

More than half of survey respondents found supplement-not-supplant rules problematic, making it the second most challenging fiscal element for Colorado school administrators. Most problematic was Title III (English learners and immigrant students), which has stricter supplanting rules that require districts to prove that not only are they using this money to supplement state and local funds, but that they are also using it to supplement federal funds from sources other than Title III. Another challenge is that supplement-not-supplant rules restrict districts from using ESEA funds for state or district mandates, even if that mandate advances the goals of ESEA. For example, to obtain ESEA waivers, the US DOE asked that states establish teacher evaluation systems that incorporated student outcomes. To do so, states generally needed to create new laws or amend old ones. However, once states established these new laws, as did Colorado, supplement-not-supplant rules kicked in. Districts could no longer use ESEA dollars for activities directly mandated by those laws. This circumstance has created concerns for Colorado school officials, rural and non-rural alike, who said that they were afraid to use Title II professional development funds for any activities related to the very law that had been passed, in part, to obtain an ESEA waiver.

Rural and non-rural districts alike found federal reporting and compliance requirements to be onerous. Asked to rate the burden of these requirements on a scale of one through ten, 70% of respondents selected a rating of seven or higher, and 12% selected the highest rating of ten or “extremely burdensome.” No one selected the lowest rating of one (“not burdensome at all”). Reporting requirements were most problematic for Title I and for Title III (English learners and immigrant students).

### **Rural-Specific Challenges Administering Non-rural Specific Sections of NCLB**

Five major categories of ESEA administration challenged rural study participants more than non-rural participants. These challenges were funding, staffing, flexibility, regional services/consortia administration, and professional development. Additionally, although rural and non-rural participants alike were frustrated by the

administration of supplemental services, rural districts faced a unique set of obstacles because their remote locations often made it difficult to attract any providers, much less high-quality providers. “SES (supplemental educational services) companies scam on small rural districts,” one survey respondent wrote. Said another: “We could have purchased the intervention with the \$18,000 we paid the provider that made one trip to our site.”

A related challenge is that Colorado districts that are required to offer supplemental educational services must set aside 15% of Title I funding each year to pay for the services. These set-asides can be especially problematic in rural districts because they generally receive smaller total pools of Title I funds. For instance, in 2013, for the first time in nine years, a regional services agency official who participated in this study advised one of her districts to forgo Title I funding because of the supplemental educational services set-asides. The allocation would have been \$2,800 (\$3,500 minus 15% for the set aside.) Considering the strings attached, the official felt that receiving the funds was just not worth it.

In general, rural school officials were more likely than non-rural administrators to indicate that NCLB funding was inadequate. The rural/non-rural difference was particularly stark for Title I and for Title III (English learners and immigrants). For instance, when asked to identify features of Title I that were barriers to improving student achievement, more than 20% of rural survey respondents said funding was inadequate. No urban respondents mentioned inadequate funding levels. Responding to the same question about Title III, two thirds of rural respondents mentioned inadequate funding as compared to one third of urban-suburban respondents.

This finding is not to suggest that urban and suburban officials do not also need or want more funds. However, most NCLB funds are allotted, at least in part, on a per-pupil basis. In very small districts, even relatively large per-pupil funding allotments generate total grant amounts that are very small. For instance, in 2012-2013, Colorado’s rural Kit Carson R-1 school district, which enrolls 110 students, received \$18,713 in Title I funds, which is not enough to pay a single teacher’s salary (Colorado Department of Education, 2012a, 2012b). Yet even that small allotment is equivalent to \$170 per pupil. By contrast, Douglas County, Colorado’s third-largest district, receives about \$15 per pupil. Using free and reduced-price meal qualification as a yardstick, Kit Carson’s poverty rate is nearly three times higher than Douglas County’s. Yet because Douglas County enrolls nearly 65,000 students, that \$15 per-pupil allotment adds up to nearly \$1 million. As such, Douglas County has enough baseline funding to hire personnel and pay for other Title I expenses. Yet Kit Carson may fall short of the critical mass of funding necessary to meaningfully carry out Title I’s many objectives.



This lack of baseline funds is even more problematic for Title III, which is a much smaller total pool of funds than Title I. However, in the case of Title III, districts that qualify for allotments of less than \$10,000 must pool their funds in consortia. The challenges of consortia funding management are addressed in a subsequent section.

A further challenge is that Title I funding formulas can, as described above, disadvantage small districts, which tend to be rural (Strange, Johnson, & Finical, 2009). This situation is certainly the case in Colorado. Table 3 demonstrates this phenomenon by contrasting two large Colorado districts that benefitted from the weighting formulas (Denver and Aurora) with all the state's districts that had higher poverty rates but were disadvantaged by the formula because they had fewer students.

What would rural districts do with additional funding? The superintendent of the Strasburg district reports that he would purchase technology. Like many other small districts, Strasburg struggles to fulfill NCLB data collection and reporting requirements because its technological infrastructure is inadequate, but NCLB's main funding source for technology (Title II, Part D, Enhancing Education through Technology) has been defunded.

Small rural districts need time-saving technology, in a sense, more than their urban counterparts because rural districts generally lack the funds to hire someone who devotes all his or her time to managing federal funds. When asked who handled decisions and compliance related to federal programs, non-rural respondents were about twice as likely as rural respondents to say that this responsibility fell to a federal funding coordinator or manager. Conversely, rural respondents were significantly more likely than urban respondents to say that these duties were assigned to the superintendent, who obviously has additional duties. In rural districts, the people who managed or helped manage federal funding and compliance included a sixth-grade classroom teacher; a principal who doubled as a secondary instructor; and a school board secretary who also managed business, human resources, grants, payroll and accounts payable.

Numerous survey respondents made the point that small rural districts must comply with most of the same reporting requirements as larger districts even though they lack the resources to hire a dedicated federal funding manager. For instance, a survey respondent whose duties included teaching as well as federal reporting and compliance said, "I believe that reporting is important to the continued success of programs, however, because there is not enough money to fund a position to do this, the responsibility falls on my shoulders which takes away from instructing students." Rural study participants also expressed concerns that they might be losing out on federal grants because they were stretched too thin to fully inform themselves of funding opportunities.

Perhaps because they have trouble meeting reporting

and compliance requirements, rural survey respondents were significantly more likely than their non-rural counterparts to say that Title I funding rules should be very flexible (24% vs. 5%). Despite their stated desire for flexibility, rural school officials did not necessarily take advantage of all the flexibility that was available. For example, rural survey respondents were significantly more likely than non-rural respondents to use "targeted assistance" for Title I, A, and were significantly less likely to use the "schoolwide" model (Figure 2)—even though the schoolwide model is, in many ways, more flexible. Districts that use this model do not have to prove that funds are used exclusively for the benefit of Title I students because every student in the school can receive services, regardless of income level. In addition, schoolwide programs make it easier to leverage funds by combining multiple sources of NCLB monies (e.g., funds from Title I and Title II). Although schoolwide programs require poverty rates of at least 40%, the CDE can and does waive this provision.

In interviews, school officials said that rural schools used targeted assistance more frequently because prior to the 2009 introduction of a "Unified Improvement Plan" designed to meet both federal and state accountability guidelines, schoolwide planning was more complicated and time-consuming than targeted assistance planning. So, in a sense, the flexibility introduced an additional layer of complexity. Additionally, rural districts often receive very small pools of ESEA funds that are not adequate to serve everyone in a school. Thus, a schoolwide program, while nice in concept, might be unsustainable for a small, rural district.

Although it is unclear whether the grant process actually disadvantages rural districts, it was perceived as a major challenge by participants in this study.<sup>5</sup> In fact, at the time of the study, a rumor was circulating in the state that one of NCLB's formula-funded programs might be converted to a competitive grant. A US DOE official was unaware of any plans to convert the program to a grant model, but even this unsubstantiated rumor was enough to cause grave concern among rural study participants.

Adding fuel to the fire is the fact that the Obama

<sup>5</sup>One of the stated reasons for introducing REAP is that rural school districts lack the resources to apply for competitive grants from the US DOE, but depending on the measure used, rural districts do not always appear to be disadvantaged by the competitive granting process: According to a 2007 analysis of three competitive grant programs administered by the Office of Elementary and Secondary Education, rural districts received about a third of the funds available from these programs and about a third of the available grants (Apling, 2007), but they enroll just a quarter of the nation's school children. Average grant sizes were also similar for urban and rural locales. However, a smaller than average percentage of rural districts received grant money (1% vs. 2%).

Table 3

*2009 Estimated Gain or Loss of Title I-A Grants with Alternate Weights for the Targeted Grant and Education Finance Incentive Grant (EFIG) Formulas for Colorado Districts with FRL Percentages Higher than Denver's or Aurora's*

District	Setting <sup>a</sup>	FRL <sup>b</sup> (n)	FRL <sup>b</sup> (%)	Gain (Loss) Due to Number Weighting, in Dollars <sup>c</sup>
Center 26	Rural	537	88.76	(800)
Adams 14	Urb-Sub	6,096	82.13	(410,200)
Centennial	Rural	178	80.91	(19,900)
Manzanola	Rural	142	80.23	(37,700)
Sheridan	Rural	1,245	78.06	(186,400)
Sierra Grande	Rural	195	77.38	(29,000)
Las Animas	Rural	452	76.35	(52,000)
Westminster	Urb-Sub	7,383	74.86	(12,000)
Rocky Ford	Rural	653	74.37	(151,200)
Aguilar 6	Rural	98	73.68	(1,700)
S. Conejos	Rural	203	72.50	(37,600)
Huerfano	Rural	448	72.26	(32,900)
E. Otero	Rural	933	70.79	(227,700)
Denver	Urb-Sub	54,485	70.53	5,208,400
Aurora	Urb-Sub	22,677	61.34	530,500

*Note.* <sup>a</sup> = Setting as defined by this study analysis. <sup>b</sup> = Colorado Department of Education, 2009 Fall Pupil Membership, percent and number of free and reduced-price lunch students. <sup>c</sup> = CRS, September 30, 2009, Gain and Loss Estimates based on unpublished data provided by the U.S. Department of Education, Budget Service; Funds appropriated under the American Recovery and Reinvestment Act of 2009 was not included in the analysis. Details may not add to totals due to rounding; CDE data are shown for comparative purposes only and were not used in CRS calculations.

administration has used competitive grants extensively (e.g., Race to the Top; see U.S. Department of Education, 2014c). In the coming years, these types of grants are expected to become a greater force in federal education policy and funding. Even when small rural districts pooled their funds into regional services agencies, they said they had trouble securing competitive grants. For instance, an official with one such agency said that her group could not qualify for federal Investing in Innovation funds (U.S. Department of Education, 2014b) because they could not meet the grant guidelines for minimum size requirement (100,000 to 500,000 students), match requirements, or show that they would have a large-scale impact.

Pooling funds can also be a challenge. In 1965, the Colorado General Assembly established Boards of Cooperative Educational Services or BOCES. These

regional agencies, which exist in some form or another in nearly every state, permit two or more school districts to work together to provide educational services, including the management of federal programs and funds (Colorado BOCES Association, 2014).

BOCES provide a wide variety of services in settings ranging from large, metropolitan areas to small, rural hamlets. However, when it comes to federal program management in Colorado, BOCES play a more prominent role in rural districts. Such districts may pool their funds to gain more leverage from their very small individual allocations. Additionally, as previously noted, districts that are eligible for less than \$10,000 in Title III funds are actually required to pool their funds through some sort of consortium, such as a BOCES. BOCES management is appealing to rural districts because they lack the resources

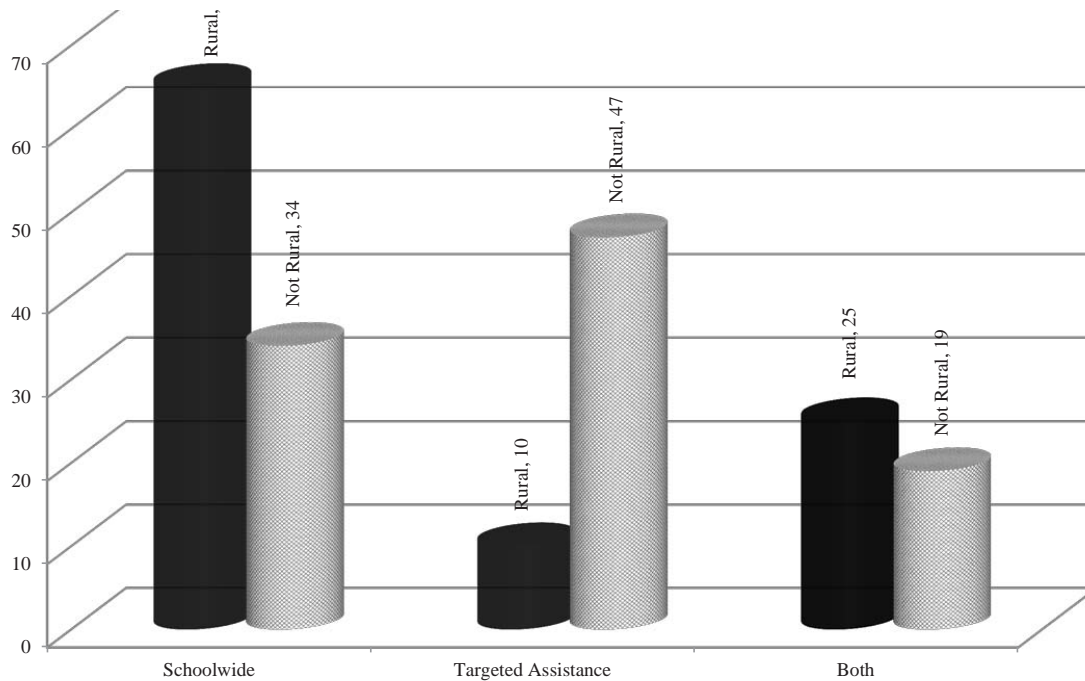


Figure 2. Percentages of rural and non-rural survey respondents who reported used schoolwide assistance; targeted assistance; or both for Title IA.

to fulfill federal compliance and reporting requirements. However, it is also inherently challenging in that it can be difficult to spend the money in ways that benefit all the contributing districts. “We have had trouble getting the type of professional development we need,” the Strasburg superintendent said. “With 20 plus districts, it’s hard to meet everyone’s needs.”

An additional challenge is that rural BOCES members may be located so far from each other that it is difficult, if not impossible, to stage professional development and other shared activities in a location that does not impose costly travel requirements on at least some of the districts.

Regardless of whether a BOCES manages their funds, rural districts often have trouble finding nearby professional development opportunities for which they can afford to pay with their limited pools of federal funds. Asked to identify barriers unique to rural districts, one survey respondent wrote, “One hour to nearest city and often hours from offering location, which requires overnight lodging, meals and transportation.” These challenges are especially problematic when one considers that the most effective professional development is ongoing professional development, which becomes unaffordable when every session requires lodging for the trainer and/or the trainees (Darling-Hammond, Wei, Andree, Richardson, & Orphanos, 2009).

### REAP: A Challenge and a Cure

When it came to addressing rural-specific barriers to administering NCLB, REAP was both a challenge and a cure. For instance, rural study participants were extremely appreciative if they received REAP funding. “We are very poor,” one rural survey respondent wrote. “Our bonding and tax base is very small. We are glad there are funds to help in any way possible.”

Participants reported that a major use for REAP funding was technology, especially since ESEA’s main source of technology-related support (Title II, D) was defunded. This use in turn has helped to address staffing issues since technology can, ideally, help streamline ESEA-related administrative tasks. REAP funds were also used to provide professional development specific to the receiving school district, which ameliorated problems associated with providing training through consortia consisting of multiple districts with multiple needs. In addition to providing flexibility via REAP-Flex, REAP itself was perceived as flexible.

Yet REAP was not a panacea. One problem related to the challenges described in the opening paragraphs of this article—i.e., the issue of how “rural” is defined. Two separate but related definitional problems exist. The first

concerns how the state defines rural and for what purposes it uses the definition, and the second concerns how the US DOE defines rural and uses that definition to target policy and financial assistance to districts.

Like many state education agencies, the CDE has its own definition of “rural” that it uses for statistical and program purposes such as teacher effectiveness. A source of confusion for some study participants was that the state’s definition is not aligned with the definition that the US DOE uses for purposes of identifying REAP eligibility. That definition uses locale codes developed by the National Center for Education Statistics in the 1980s. Although these codes were updated in 2006,<sup>6</sup> REAP continues to use the old coding system, as its 2002 statutory language predates the updates. This arrangement can be a source of confusion, as can the fact that, as previously explained, REAP’s two major components (SRSA and RLIS) use different criteria (including different locale codes) to determine eligibility.

In interviews, rural educators expressed concern with multiple and changing definitions of rural. Study participants said the two different sets of eligibility requirements (which encompass two slightly different definitions of rural) might lead some districts to believe erroneously that they were ineligible for the grants.

Further, as the Strasburg situation illustrates, some rural districts are ineligible for both of REAP’s programs. In fact, more than 40% of the nation’s 14,000 rural school districts either do not qualify for or do not apply for any of REAP’s programs, including simple flexibility provisions that do not carry additional funding (Kuenzi, 2013). The US DOE does provide some flexibility in SRSA eligibility: Districts that are considered rural by their states can use those state designations to establish REAP eligibility as long as that state’s REAP coordinator receives permission from the US DOE (U.S. Department of Education, 2003). As of 2012–13, Colorado had not used this flexibility option in the last several school years, nor have many other states.

### Discussion

Are rural school districts an administratively disadvantaged subgroup, as the REAP “theory incarnate” implies? (Pawson & Tilley, 2004, p. 3). The answer appears to be “yes,” although that yes is certainly qualified. While ESEA burdened rural districts more heavily in certain ways, rural and non-rural study participants alike also

<sup>6</sup>The system was developed in the 1980s and updated in 2006. The 2006 changes resulted in a net nationwide gain of 94 additional rural school districts (Schneider, 2006). Colorado had a net loss of one rural district. However, in general, there is a lot of overlap between the old and new classifications, with 92.5% of schools classified as “rural” under the old system also considered rural under the new system (Kuenzi, 2013)

shared certain challenges. Both reported equally high levels of frustration with administering supplemental services, complying with supplement-not-supplant rules and fulfilling their reporting obligations. When lawmakers finally do reauthorize ESEA, it might make sense to prioritize addressing these challenges since they appear to be so widespread. ESEA waivers have already permitted most states to eliminate supplemental services. It would perhaps make sense to codify this practice into law or, at the very least, to make it optional for districts to participate in the program. Additionally, district administrators across the nation would almost certainly appreciate a reduction in reporting and compliance paperwork related to ESEA.

Supplement-not-supplant rules might also be rethought so that they are clearer and easier to follow, especially in the case of Title III, which one study participant described as becoming “a funding source that cannot be spent.” In fact, complaints about the restrictions unique to Title III funds were so prevalent from such a wide array of districts that lawmakers might consider rethinking the entire funding philosophy of the program, which is to distribute a very small pool of funds to a very large number of local education agencies, leaving individual school districts with pots of money so small that one federal official interviewed for our study described them as “the cherry on top of your cake.” In 2014, Congress appropriated \$723 million for Title III, A, as compared to \$14 billion for Title I, A (U.S. Department of Education, 2014a). Given that the population of English learners is growing rapidly, it would make sense to increase total funding for Title III. If this policy outcome is not possible, then lawmakers might consider targeting the funds that *are* appropriated more narrowly, perhaps to districts with particularly high rates of growth in their English learner populations.

Rural districts also faced burdens that were either nonexistent or less problematic in their non-rural counterparts. Annual funding levels were often insufficient to meet ESEA objectives. Small staffs struggled to carve out time to complete paperwork and to bring themselves up to speed on the sometimes confusing flexibility measures and other aspects of the law. It was not always easy for consortia to serve multiple school districts with multiple, sometimes conflicting, needs. For remote districts, opportunities for professional development could be few and far between, as could supplemental service providers.

Despite the existence of REAP’s rural-specific funding streams, districts continue to suffer problems caused by the dense tangles of mandates attached to the small pools of funds that non-REAP, ESEA formulae generate for districts with low student enrollments. Altering the Title I funding formulae as suggested by Strange (2010) would be one way to address this issue. However, this change would not solve problems related to aspects of ESEA such as Title III, which

falls outside of Title I. Further, the changes proposed by Strange (2010) would benefit rural districts at the expense of their large, urban counterparts, which face challenges of their own.<sup>7</sup> One solution would be to follow Strange's (2010) suggestion that a "hold harmless provision could protect districts that now benefit from [Title I] number weighting, or mitigate their loss" (p. 13).

An alternative solution might be to increase funding for REAP while also relaxing and simplifying eligibility requirements. At the very least, the law could streamline the definition of rural so that districts did not leave money or flexibility on the table simply because they were confused about whether or not they qualified for the funds. Currently, fewer than half the nation's rural districts benefit from REAP, either because they are unaware that they qualify or because, like Strasburg, Colorado, they are small and rural yet they do not qualify for any REAP program (Kuenzi, 2013).

For the districts that received it, new or additional REAP funding would go a long way toward addressing rural-specific challenges. REAP funds could be used to update technological infrastructures. This use in turn might make it faster and easier for already over-burdened rural staffs to conduct compliance and reporting-related tasks. Updated technology might also make it easier for rural educators to pursue high-quality professional development online or, at the very least, through a blended learning approach that combines online and in-person coaching and instruction.

Whatever changes are made, it is important that they are communicated in a timely, clear, and accurate manner to all parties involved. In rural areas in particular, our study participants sometimes felt that they were out of the loop, a situation that permitted rumors to flourish, such as the inaccurate fear that one of ESEA's funding sources was about to be converted from a formula program to a competitive grant that would put rural districts at a disadvantage. The informational needs were particularly acute when it came to communication from the federal level. Clearer and more frequent federal updates would go a long way toward helping state and local officials navigate and

administer the often complex inroads of ESEA. The results of this study suggest that, when it comes to the main federal funding source for education, rural districts are, indeed, administratively disadvantaged. There is no need for them to be informationally disadvantaged as well.

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<sup>7</sup>Three aspects of NCLB administration were more problematic for non-rural districts that participated in our study. These aspects were comparability (establishing that Title I schools receive comparable resources to non-Title I schools), rank order funding by poverty rate (prioritizing high-poverty schools and grade spans when distributing funds), and the administration of programs involving institutions that were not directly under the school district's control. Comparability and rank order funding were less problematic for rural districts because many have only one school per grade span and thus do not need to prove compliance with these rules. Rural areas were also less likely to house institutions that are not directly under their control, such as non-public schools, charter schools, and homes for neglected or delinquent youth.

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