Council of the Great City Schools
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September 15, 2011

The Honorable Lamar Alexander and The Honorable Johnny Isakson
U.S. Senate
Washington D. C. 20510

Dear Senator Alexander and Senator Isakson:

The Council of the Great City Schools, the coalition of the nation's largest central city school districts, applauds the introduction of your amendments to Title I and Title II of the Elementary and Secondary Education Act (ESEA) today. Your bill reverses the trend in federal education legislation by simplifying and streamlining the volume of federal requirements that local school districts must implement in order to receive federal school aid. For more than a decade, the Council has called for paring back unnecessary and unproductive federal requirements in the ESEA and providing a more focused approach to supporting and facilitating effective instructional practices and improvement measures. Even the U.S. Department of Education's Inspector General in a March 2006 report has been critical of the "588 SEA and LEA compliance requirements" in Title I, Part A of ESEA.

The Council also appreciates the ongoing consultation with the Great City Schools during the development of the bill. We operate the largest ESEA programs in the country and believe this consultation process not only has resulted in numerous improvements to the bill, but also can serve as a model for how to develop federal education legislation.

From our perspective, the key features of your Title I bill include the reduction in federal ESEA requirements, the increased flexibility in the use of funds, the elimination of a number of mandated set-aside expenditures, and the replacement of the cascading sanctions of the No Child Left Behind Act. In fact, as the legislative process moves forward, we believe that some of these initiatives could be expanded.

Over multiple reauthorizations, Title II of ESEA has become unwieldy and unfocused, and in substantial need of rewriting. Title II has expanded significantly in statutory language, program requirements, number of programs, and funding of non-school programs over the years. Your bill provides school districts with a predictable and consolidated formula-based funding stream,which is important in the current school budget environment. It also reduces federal requirements, and provides for local district decision making flexibility in the use of funds to improve the quality of teaching and learning.

As the legislative process progresses, the Council looks forward to continuing to work with you on areas of the bill where we have some concerns. For example, while we agree with providing a more workable and focused set of intensive school intervention requirements, the reliance on state departments of education as the primary engine for educational improvement, in our opinion, will exceed most states' capabilities. We are also concerned that the lack of a "such sums" authorization in the out-years is less flexible than the congressional budget process and could result in freezing federal funding for the Title I and Title II programs over the next six consecutive years.

The Council views the introduction of your bill as an important exemplar of support for critical educational services to close achievement gaps and improve teacher quality without the current level of unnecessary federal micro-management. The bill underscores that a bipartisan consensus on key ESEA programs is possible, and represents a positive step in the ESEA reauthorization process.

Sincerely,

Michael Casserly
Executive Director