

October 31, 2014

Carlas McCauley
U.S. Department of Education
Office of Elementary and Secondary Education
Office of School Turnaround
400 Maryland Ave. S.W., Room 3C116
Washington, DC 20202-6132

Re: Invitation to Submit Evidence-Based Whole-School Reform Strategies

Dear Mr. McCauley,

At our recent meeting at the Department of Education, along with other members of the National Coalition on School Diversity, we promised to submit a proposed model for a whole school reform strategy that takes into consideration the evidence-based value of school diversity in school reform. Attached please find our proposal for consideration as an evidence-based, whole-school reform strategy available to Local Educational Agencies (LEAs), in partnership with a strategy developer, when applying to use FY 2014 School Improvement Grant (SIG) funds, as set out in 79 Fed. Reg. 53253, 53257 (September 8, 2014).

Including whole-school magnet programs as an approved turnaround model for SIG recipients will increase student diversity, achievement, and attainment at some of the nation's lowest-performing schools. Magnet schools have been used by the Department of Education for decades to help LEAs successfully combat segregation, increase educational equity, and raise achievement for isolated students through the Magnet Schools Assistance program. Should the Department decide to include magnets as an approved turnaround model, this pre-existing expertise will enable the Department to effectively and efficiently aid LEAs during their transition to the new educational model.

Whole-school magnets have an impressive history of successfully turning around struggling and failing schools,¹ which makes including magnets as an approved turnaround model for SIG recipients a natural next step in extending educational equity to students at isolated, failing schools. Because magnet schools are designed to draw students from across a wide range of attendance zones and across district lines with unique themed curriculums and a focus on student-centered learning, including a magnet school model as an evidence-based, whole-school reform strategy available for SIG recipients will help the Department meet its stated goals with regard to its long-standing diversity priority.² This is especially important in light of the fact that

¹ Some excellent examples of struggling schools turned around with a magnet model include: Normal Park, TN (https://www2.ed.gov/admins/comm/choice/magnet-k8/report_pg29.html); Walter Bracken STEAM Academy, NV (<http://www.nationalblueribbonsschools.com/wp-content/uploads/2013/11/Kathleen-Decker-Walter-Bracken-STEAM-Academy-Las-Vegas-NV.pdf>); and Dunbar High School, FL (http://doeweb-prd.doe.state.fl.us/eds/nclbpar/year1213/nclb1213.cfm?dist_schl=36_831). See also Richard Kahlenberg, *Turnaround Schools That Work: Moving Beyond Separate but Equal* (2009), at pp. 6-7, available at <https://tcf.org/assets/downloads/tcf-turnaround.pdf>.

² Earlier this year the National Coalition on School Diversity commented on the "Secretary's Proposed Supplemental Priorities and Definitions for Discretionary Grant Programs," 79 Fed. Reg. 35736, noting that the Department needs to place greater emphasis on diversity in discretionary grant programs, including the School

schools with a disproportionate number of African American and Latino students tend also to be low-wealth schools, which tend to become “failing” schools. Additionally, increasing diversity and changing the composition of the student-body of a struggling school also changes the composition of parents, which can lead to more diverse participation in school governance and enhanced fundraising efforts, and potentially resulting in greater gains for students.³ Finally, a significant body of research supports the assertion that well-supported, whole-school magnet programs increase student achievement and attainment.⁴ Including whole-school magnets as an approved turnaround model will help to reduce racial and socioeconomic isolation at low-performing schools, result in a more equitable distribution of educational resources, and ensure that all students have the opportunity to succeed.

Thank you for the opportunity to submit this evidence-based, whole-school reform strategy for the SIG program. We would be happy to meet with you and further discuss the inclusion of magnets as a turnaround model for SIG recipients at your convenience.

Sincerely,

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Improvement Grant program. See http://www.school-diversity.org/pdf/NCSD_Race_and_SES_Diversity_Priority_comments_7-23-14.pdf. Including whole-school magnets as a turnaround model for SIG recipients would make significant progress toward fully implementing the stated diversity priority.

³ See generally Richard Kahlenberg, *Turnaround Schools That Work: Moving Beyond Separate but Equal* (2009), available at <https://tcf.org/assets/downloads/tcf-turnaround.pdf>.

⁴ See generally National Coalition on School Diversity Research Brief 6, *Magnet School Student Outcomes: What the Research Says*, available at <http://www.school-diversity.org/pdf/DiversityResearchBriefNo6.pdf>.

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PROPOSAL FOR A WHOLE-SCHOOL MAGNET REFORM STRATEGY TO REDUCE POVERTY CONCENTRATION AND RACIAL ISOLATION IN SUPPORT OF IMPROVEMENTS IN STUDENT ACADEMIC ACHIEVEMENT AND ATTAINMENT

This proposal is submitted by the National Coalition on School Diversity pursuant to the “Proposed Strategy Requirements” for the Invitation to Submit Evidence-Based Whole-School Reform Strategies, as set out at 79 Fed. Reg. 53253, 53257 (Sept. 8, 2014). (See Appendix A for a summary of the proposal requirements)

Narrative Description Addressing Proposed Strategy Requirements

Improving Student Academic Achievement or Attainment

The resegregation of U.S. schools in recent years has resulted in an unequal distribution of educational opportunity throughout the nation, with the academic performance of low-income and minority students suffering as a result. A report released by the UCLA Civil Rights Project in 2012 found that a majority of African-American and Latino students now attend schools that are predominantly low-income and non-white, leading to what researchers define as “double segregation.” Even more disheartening is new evidence that suggests that schools that once had successful integration programs, especially in the South, are becoming segregated once again.⁵ Fortunately, the use of magnet schools as a model for School Improvement Grant funds has the potential to significantly increase student academic achievement and attainment. Fostering increased integration in schools has been the most prominent use of the magnet school model in the past,⁶ and evidence suggests that use of the magnet model does in fact increase [racial and socioeconomic] diversity in schools.⁷

The Department of Education’s own Magnet School Assistance Program Technical Assistance Center has observed that “[t]he benefits of a diverse school environment cannot be overstated. Exposure to peers of different backgrounds paired with an innovative magnet curriculum linked to real-world experiences helps students, even those most at risk, to succeed in school, college, and careers.”⁸ A significant body of academic research supports this statement, indicating that low-income and minority students exhibit better academic performance in diverse, rather than segregated, school settings, with the improvements due not only to significant peer effects, but also to a reduction in opportunity and resource disparities.⁹ Several studies have identified

⁵ “E Pluribus...Separation: Deepening Double Segregation for More Students,” Gary Orfield, John Kuscera, & Genevieve Siegel-Hawley, G. (2012), UCLA Civil Rights Project, available at http://civilrightsproject.ucla.edu/research/k-12-education/integration-and-diversity/mlk-national/e-pluribus...separation-deepening-double-segregation-for-more-students/orfield_epluribus_revised_omplete_2012.pdf

⁶ <http://www2.ed.gov/programs/magnet/index.html>

⁷ See “Research Brief No. 6, Magnet School Outcomes: What the Research Says, Genevieve Siegel-Hawley and Erica Frankenberg, National Coalition on School Diversity, available at <http://prrac.org/pdf/DiversityResearchBriefNo6.pdf>

⁸ http://www.msapcenter.com/doc/MagnetCompass_July2014.pdf at 1.

⁹ Racially and socioeconomically integrated schools have higher rates of graduation than high-poverty, segregated schools. See “Who Graduates? Who Doesn’t?: A Statistical Portrait of Public High School Graduation, Class of 2001,” Christopher B. Swanson, Education Policy Center and The Urban Institute, at 35, available at http://www.urban.org/UploadedPDF/410934_WhoGraduates.pdf, (“there is a strong and very detrimental linkage between graduation rates and the environmental conditions that go along with factors like poverty and

significant magnet school impacts on student academic performance in the areas reading, social studies, and math, as well as higher overall rates of student retention and graduation.¹⁰ General research on racial and economic school integration supports the idea that the use of SIG funds to implement a whole school magnet model designed to encourage racial and socioeconomic integration at isolated Priority and Focus schools has the potential to increase student achievement in these schools.¹¹

Implementation for All Students in a School

The magnet school model supported by this proposal is the “whole school” magnet program, or “a magnet program [offered] to all students in the school who are in the grade levels at which the program operates,”¹² where an entire school is focusing on a particular theme. While there are instances of “programs within schools” magnets, where only a portion of students receive the benefits of a magnet school education, this approach has been shown to result in less integration

segregation.”); Brief of 553 Social Scientists as *Amici Curiae* in Support of Respondents, *Parents Involved in Community Schools v. Seattle School Dist. No. 1*, 127 S. Ct. 2738 (2007), at App. 39, (“An examination of over 13,000 public high schools across the country in 2004 showed that schools with a higher concentration of blacks and Latinos tend to have lower “promoting power,” which indicates the percentage of students who stay in school and are promoted each year from grades 9 to 12.”) citing Robert Balfanz and Thomas C. West, “Racial Isolation and High School Promoting Power,” in *Graduation Gap Policy Brief* (Baltimore: Center for Social Organization of Schools, Johns Hopkins University, 2006). See also Robert Balfanz & Thomas C. West, “Racial Isolation and High School Promoting Power,” *Graduation Gap Policy Brief*, CENTER FOR SOCIAL ORGANIZATION OF SCHOOLS, Johns Hopkins Univ. (2006). 8; Jonathan Guryan, *Desegregation and Black Dropout Rates*, AM. ECON. REV. 94, no. 4 (2004), at 919-43. Racially integrated schools result in better reading scores. See “The Race Gap in High School Reading Achievement: Why School Racial Composition Still Matters,” Shelly Brown-Jeffy, (2006), 13 *Race, Gender & Class* 3/4, pp. 268-294, at 290 available at <http://www.jstor.org/stable/41675185>, (“These study results reveal that the Black-White gap in reading achievement in schools with less than 10% Black, Hispanic, or Native American students enrolled is substantial. On the contrary, results show that schools with 25-55% Black, Hispanic, and/or Native American students have average reading achievement scores that are on average almost two points higher than in schools with 55% [or] more Black, Hispanic, and/or native American Students. While these schools do have a Black-White achievement gap, the gap is not as large as in schools where less [than] 10% of the population is Black, Hispanic, and/or Native American.”); For a comprehensive survey of recent research, see the website of the National Coalition on School Diversity: <http://school-diversity.org>; see also NY Appleseed, “KEY RESEARCH HIGHLIGHTS: HOW DIVERSITY PROMOTES BETTER EDUCATIONAL OUTCOMES,” available at <https://www.appleseednetwork.org/promoting-diversity-in-new-york-city-schools/>.

¹⁰ “Student Achievement in Public Magnet, Public Comprehensive, and Private City High Schools,” Adam Gamoran (1996), 18(1) *Educational Evaluation and Policy Analysis* 1; “Can Interdistrict Choice Boost Student Achievement? The Case of Connecticut’s Interdistrict Magnet School Program,” Robert Bifulco, Casey Cobb, Courtney Bell (2009), 31(4) *Educational Evaluation and Policy Analysis* 323; “What Factors Predict High School Graduation in the Los Angeles Unified School District?,” David Silver & Marisa Saunders, (California Dropout Research Project, Report #14, 2008); “Does School Choice Work? Effects on Student Integration and Achievement,” Julian Betts, et al., (Public Policy Institute of California, 2006).

¹¹ A 2010 study of students in Montgomery County, Maryland, found that students living in public housing randomly assigned to lower-poverty neighborhoods and schools outperformed those assigned to higher poverty neighborhoods and schools. See “Housing Policy Is School Policy: Economically Integrative Housing Promotes Academic Success in Montgomery County, Maryland” Heather Schwartz, The Century Foundation (2010), available at <http://tcf.org/assets/downloads/tcf-Schwartz.pdf>

¹² “Characteristics of MSAP Projects,” American Institutes for Research, available at <https://www2.ed.gov/rschstat/eval/choice/magneteval/chapter1.pdf> at I-1

and fewer benefits than whole-school magnets and is therefore not an approach advanced by this proposal.¹³

Addressing the Whole School

“[A] comprehensive magnet school plan include[s] vision and mission statements, educational goals, objectives and strategies, curriculum or theme design, implementation steps, marketing and recruitment strategies, budget and funding plans, timelines, policies, professional development plans, and monitoring and evaluation plans.”¹⁴ The choice of theme in magnet schools is a particularly important feature, and one which will impact the operation of the whole school. As the Department of Education has observed, a magnet “theme must be grounded in a school vision and mission with educational goals and objectives, a set of shared values, and guiding principles that shape the entire program and help keep it on track.”¹⁵ Potential magnet school themes include but are not limited to the following: International Baccalaureate (IB), STEM programs to include a summer residential experience of no less than 1 full week at a postsecondary institution; dual language programs designed to the needs and languages of local ELLs;¹⁶ career programs based in whole or part at local institutes of higher education; themes such as arts, including visual arts, dance, music, theater, public speaking and drama.

Student Enrollment

The key element in a magnet-based school turnaround model is a shift in the composition of the student body. Because of residential segregation and school attendance zones, many schools in need of SIG grants experience high levels of poverty concentration, and racial isolation. These conditions have been shown to be detrimental to student outcomes, and it is unfair to subject low income students of color to these educationally detrimental conditions in situations where they can be avoided.¹⁷

¹³ In a 2008 survey, Erica Frankenberg and Genevieve Siegel-Hawley found that “[t]wo-thirds of whole magnets (66.1%) reported substantial integration under their current policy or a gradual increase in integration levels. Only half of the “school within a school” magnets were similarly integrated ... Importantly, 16.6% of school within school magnets report being one-race schools, which suggests that these magnet programs are less effective than whole magnets, among the magnet schools in this survey, in creating racially diverse schools. Additionally, there are a disproportionately lower percentage of within-school magnets that reported increasing integration during the last decade (only 22%). By contrast, 35% of whole-magnets reported increasing integration during this time period.” *The Forgotten Choice?: Rethinking Magnet Schools in a Changing Landscape*, Erica Frankenberg & Genevieve Siegel-Hawley (2008), The Civil Rights Project, available at http://www.magnet.edu/files/pdf/rar_rethink.pdf.

¹⁴ “Creating Successful Magnet School Programs,” U.S. Department of Education (2004), available at <http://www2.ed.gov/admins/comm/choice/magnet/report.pdf> at 7 (internal citations omitted)

¹⁵ “Creating Successful Magnet School Programs,” U.S. Department of Education (2004), available at <https://www2.ed.gov/admins/comm/choice/magnet/report.pdf> at 9

¹⁶ For an excellent example of an award-winning dual language magnet program, see School Successes Inspire N.C. Push for Dual Language, [Lesli A. Maxwell](http://www.edweek.org/ew/articles/2014/10/15/08dual.h34.html) (October 2014), Education Week, available at <http://www.edweek.org/ew/articles/2014/10/15/08dual.h34.html>

¹⁷ A 2012 study examining achievement gaps on the National Assessment of Educational Progress for math and reading in 2007 and 2009, researchers found that Black and Latino students had smaller achievement gaps with White students when they were less likely to be stuck in high-poverty school environments. See “From All Walks of Life: New Hope for School Integration,” Richard Kahlenberg (2012-13), *American Educator*, available at <http://files.eric.ed.gov/fulltext/EJ995900.pdf>

A shift in school enrollment in a highly segregated school that is transforming into a magnet school model requires both a recruitment plan to increase in the number of higher income students and white students, and a voluntary school choice plan for low income students in the neighborhood who may wish to transfer to a low poverty high performing school within or outside of the school district. The recruitment plan may be enhanced by marketing the school regionally, beyond the local school district, through an increase in the total number of students at the school, or through gradual shifts in the school's attendance boundaries to promote diversity, for new classes of children entering at the pre-k and kindergarten level.

Free student transportation is a key element in a successful magnet and school choice plan, and in some cases, changes in state rules will be necessary to foster inter-district student transfers, at no cost to participating parents.¹⁸

Schools receiving SIG funds to implement this proposed magnet model should create reciprocal options for low-SES students in the school to attend proximate reward schools with higher SES rates and students from proximate reward schools to attend magnet programs in priority and focus schools. This exchange of students should increase classroom diversity, which research indicates should convey a variety of academic and non-academic benefits.

School Leadership

Schools operating under a magnet model differ from traditional schools in the distribution of leadership responsibilities between the administration and the teaching staff. "In [magnet] schools, leadership is not the role solely of the principal; leadership functions are clearly expected from other staff." Due to the nature of theme-based education which requires coordination across subjects and grade levels, teachers in magnet schools should be afforded more autonomy and flexibility, as well as opportunities to collaborate when designing the curriculum and preparing lesson plans.¹⁹ Additionally, due to the specialized nature of magnet schools, additional leadership roles may need to be created and filled, including positions for magnet coordinators and possibly on-site experts depending on the magnet's theme. As the Department of Education has observed

¹⁸ "For many low-income urban parents, transportation is a barrier to making a better school choice for their child. Depending upon the exact question asked, somewhere between 25 and 40 percent of respondents with annual incomes of less than \$75,000 said that transportation issues influenced their school choice, or that they would have made a different specific school choice if they had better transportation options. Most parents reported that they would have chosen an academically better school if they could have, and they are willing to have their child travel farther to get to such a school. In addition, parents who have their child enrolled in the closest neighborhood school, who either did not make a choice or chose that school over other options, greatly emphasize the convenience of that choice, compared to parents who send their child to school farther away, who are more likely to cite academic reasons for doing so." "Drivers of Choice: Parents, Transportation, and School Choice," Paul Teske, Jody Fitzpatrick, and Tracey O'Brien (2009), Center on Reinventing Public Education, p. 31, *available at* http://www.crpe.org/sites/default/files/pub_dscr_teske_jul09_0.pdf. *See also* After Brown: The Rise and Retreat of School Desegregation, Charles Clotfelter (2004), Princeton University Press, at 19. ("The vast majority of school segregation...is now between school districts.")

¹⁹ "Creating Successful Magnet School Programs," U.S. Department of Education (2004), *available at* <https://www2.ed.gov/admins/comm/choice/magnet/report.pdf> p. 11

[t]here is growing recognition in education that if principals, in general, are to be effective instructional leaders, other leadership and administrative responsibilities traditionally expected of them must be shared. This is especially true for magnet school principals who, in addition to their general administrative responsibilities, must ensure that their school's theme-focused curriculum aligns with state academic standards, must market the school to parents and the community, and must generate supportive partnerships. A magnet coordinator can help with marketing, transportation issues, volunteer coordination, parent communication and other tasks that are especially important in magnet schools.²⁰

Implementation of an effective magnet school model will require re-evaluating traditional leadership roles with an eye toward creating a more flexible and responsive decision-making structure that encourages teacher collaboration and allows for increased communication with parents and the greater community.

Teaching and Learning

The implementation of the proposed magnet school model in a school eligible for SIG funds would require on the part of teachers a “commitment to multi-dimensional instruction focused on learner needs” as well as “[m]ultiple assessment strategies...employed to monitor student learning, progress, and success.”²¹ Furthermore, schools implementing the proposed magnet model should afford students a unique opportunity to take advantage of learning opportunities outside school walls through their partnerships with local community businesses and institutions.²² According to MSA, in a model magnet school “[t]eachers are licensed in the areas they teach, and are ‘highly specialized’ through specific theme-based training and professional development.”²³ The magnet school approach to teaching is “typically more ‘hands on – minds on’ and use[es] an approach to learning that is inquiry or performance/project based.”²⁴

Magnet Schools of America has identified innovative curriculum and professional development as key pillars of a magnet school of excellence, as well as high-quality instructional systems “rooted in well-prepared, well-educated...teachers and administrators who are student-centered, collaborative, and inquisitive [who] prepare learners to be world ready, workforce ready, and higher education ready.”²⁵ Additionally, MSA indicates that magnets must make a “commitment to multi-dimensional instruction focused on learner needs [employing] multiple assessment strategies...to monitor student learning, progress, and success, [with] high expectations...clearly articulated and personal supports...in place to address the interests and aspirations of all students”²⁶ A school receiving SIG funds to implement this magnet model would be required to

²⁰ “Creating Successful Magnet School Programs,” U.S. Department of Education (2004), available at <https://www2.ed.gov/admins/comm/choice/magnet/report.pdf>, pp. 12-14.

²¹ <http://www.magnet.edu/about/our-mission-and-beliefs>

²² See e.g. <http://jma.hartfordschools.org/> (“Seniors spend their time at CPBN's spectacular satellite campus, working with industry experts to further their individual passions, and continuing to strengthen their academic development.”).

²³ <http://www.magnet.edu/about/what-are-magnet-schools>

²⁴ <http://www.magnet.edu/about/what-are-magnet-schools>

²⁵ <http://www.magnet.edu/about/our-mission-and-beliefs>

²⁶ <http://www.magnet.edu/about/our-mission-and-beliefs>

plan for professional development to support teachers and ensure their effectiveness working within a theme-based system and in a more diverse classroom.

Student Non-academic Support

“[S]tudents of all races who attend diverse schools have higher levels of critical thinking, an ability to adopt multiple perspectives; diminished likelihood for acceptance of stereotypes, higher academic achievement, more cross-racial friendships, willingness to attend diverse colleges and live in diverse neighborhoods, access to more privileged social networks, higher feelings of civic and communal responsibility, higher college-going rates, more prestigious jobs.”²⁷

Schools receiving SIG funds should demonstrate commitment to supporting student diversity by ensuring a culturally inclusive curriculum, strong teacher training and teaching staff diversity, and inclusive parent engagement efforts. These schools should also incorporate respected best practices for magnets that improve the achievement of low-SES students, which in turn will attract higher SES students to voluntarily enroll in the magnet schools and further increase diversity.

Finally, schools under this model must develop a transportation plan to facilitate the exchange of students between schools and enable widespread and easy participation in the program.

Family and Community Engagement

Magnet programs recognized by MSA as National Schools of Excellence through its merit awards program follow the same model proposed here, and must consider family and community partnerships as a pillar of successful magnet school design.²⁸ Magnet schools engage with families and the greater community from the outset - according to MSA

Family and Community Partnerships are mutually beneficial, offer a system of support, shared ownership, and a caring spirit and are designed to enhance a theme integrated educational environment. Partnerships with parents are essential for a rich educational experience for students. Community partnerships include a diverse array of stakeholders including business, health and human services, and policy makers to support the education of all students.²⁹

At their outset, magnet programs must focus on community and stakeholder engagement to assess the needs, preferences, and opportunities as defined by local circumstances, and should initiate this outreach through use of surveys and other active research strategies to gain a better understanding of local SES issues and concerns, barriers to integration, and family needs.

²⁷ “Research Brief No. 6, Magnet School Outcomes: What the Research Says, Genevieve Siegel-Hawley and Erica Frankenberg, National Coalition on School Diversity, *available at* <http://prrac.org/pdf/DiversityResearchBriefNo6.pdf>

²⁸ <http://www.magnet.edu/about/our-mission-and-beliefs>

²⁹ <http://www.magnet.edu/about/our-mission-and-beliefs>

APPENDIX A: Proposed Strategy Requirements

Under the proposed requirements published in the NPR, an evidence-based whole-school reform strategy must:

1. Have evidence of effectiveness that includes at least two studies that:
 1. Meet What Works Clearinghouse evidence standards with or without reservations (i.e., are qualifying experimental or quasi-experimental studies); and
 2. Found a statistically significant favorable impact on a student academic achievement or attainment outcome, with no statistically significant and overriding unfavorable impacts on that outcome for relevant populations in the study or in other studies of the intervention reviewed by and reported on by the What Works Clearinghouse. and
2. Be designed to:
 1. Improve student academic achievement or attainment;
 2. Be implemented for all students in a school; and
 3. Address, at a minimum and in a coordinated manner, each of the following:
 1. School leadership;
 2. Teaching and learning in at least one full academic content area (including professional learning for educators);
 3. Student non-academic support; and
 4. Family and community engagement.

Submission Instructions and Deadline

Interested parties must submit the following to SIGEvidenceStrategies@ed.gov

1. At least two, but no more than four, studies that provide evidence of effectiveness of the strategy consistent with Proposed Strategy Requirement (1) above; and
2. A narrative description of the strategy that addresses each of the elements of Proposed Strategy Requirement (2) above.

Each study and narrative description should be submitted in PDF format as an attachment to the email submission. Any studies that are not publicly available will be made publicly available as part of the review process. Narrative descriptions of the strategy should be no longer than 5 pages.

So that the Department may identify strategies meeting requirements sufficiently in advance of SEAs' competitions for FY 2014 funds in spring 2015, submissions must be received **no later than October 31, 2014.**