



Taking Advantage The Rural Competitive Preference in the Investing in Innovation Program Citizen Action Version

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The Investing in Innovation (i3) program is a federal competitive grant program intended to stimulate innovation in public schools. The program was initiated through the American Recovery and Reinvestment Act of 2009 and implemented in 2010.

The i3 program was open to school districts and to colleges, universities, and non-profits working with school districts. Applicants chose to apply in one of three categories – Scale-up, Validation, or Development – based on the level of research available to support the proposed “innovation” and on the potential scalability of the project. See Sidebar, **i3 Investing in Innovation**, for more information.

The Rural Competitive Preference

The scoring system used to make grant awards included a series of four “competitive preference” categories – additional points that could be earned if the proposed project served certain populations. These points were intended to attract proposals to areas of particular need.

Competitive Preference Priority 8 was for “Innovations That Serve Schools in Rural LEAs”¹:

We give competitive preference to applications for projects that would implement innovative practices, strategies, or programs that are designed to focus on the unique challenges of high-need students in schools within a rural LEA (as defined in this notice) and address the particular challenges faced by students in these schools. To meet this priority, applications must include practices, strategies, or programs that are designed to improve student achievement or student growth, close achievement gaps, decrease dropout rates, increase high school graduation rates, or improve teacher and principal effectiveness in one or more rural LEAs.

¹ An LEA is a local school district (Local Education Agency). The i3 notice defines a rural LEA as one that is eligible to participate in one of the two Rural Education Achievement Programs (REAP).

i3: Investing in Innovation Program

What is it? A federal competitive grant program intended to stimulate innovation in education, authorized through the American Recovery and Reinvestment Act of 2009 (stimulus).

How much was granted? \$650 million.

Who was eligible to apply? school districts and consortia of districts and non-profit organization/s (including colleges and universities) working with school districts.

What were grant requirements? research evidence to support the proposed innovation; a 20% match; capacity to “scale up” the innovation to reach additional students.

Grant Categories: applicants apply in one of three categories as follows:

Scale-up: grants up to \$50 million; strong research evidence; scalable to national, regional or state level (1 million students, target).

Validation: grants up to \$30 million; moderate research evidence; scalable to regional or state level (500,000 students).

Development: grants up to \$5 million; research research-based findings or theories that have been previously attempted and tested; expected to further develop and scale (100,000 students).

Scoring: grants were scored on a 100-point scale with 1 additional “competitive preference” point for early education, college access, students with disabilities and Limited English Proficiency, and 2 points for rural districts that are eligible for one of the two federal REAP program.

“Highly Rated” Announced

Proposals claiming the “rural preference” could earn up to two “bonus” points. One competitive preference point was available for proposals addressing early learning, college access, or students with disabilities or Limited English Proficiency.

In August, the U. S. Department of Education announced the “highly rated”² applicants – those that would receive *i3* funding when matching funds were secured. We were eager to find out whether the rural competitive preference had been effective in attracting high quality rural proposals. Forty-nine projects were selected. Of those 19 claimed the bonus rural preference points and 18 of them gained at least one bonus point.

The initial documents revealed that a project proposed to operate entirely within New York City had earned rural preference points, so we decided to take a systematic look at the 19 rural preference proposals to see how the rural claim was made and applied. Our concern was not whether projects deserved to be highly rated, but whether their rural claim was well made and well evaluated.

Our Review Design

We read all the documents posted on the Department website for each proposal that claimed the rural preference points. We were interested in assessing whether the proposed innovation was:

- expressly applicable in rural settings,
- focused on rural schools, and
- serving high-needs rural students.

In short, we wanted to know if the preference was successful in meeting the Department’s expectation that *i3* would generate projects “...designed to focus on the unique challenges of high-needs students in schools within a rural LEA...”

We also wanted to know whether the review process was diligent in addressing these issues.

To make these assessments we considered five factors: Innovation, Extent Rural, Substance of the Rural Claim, Money, and Review. These factors are discussed in detail in beginning on page 3.

² The term “highly rated” was initially applied by the Education Department only to the 49 proposals that were qualified (with certain requirements like raising matching funds) to receive an *i3* grant. Since then the term has been broadened to include a “second tier” of proposals. Throughout this report, we use the term “highly rated” to identify only the 49 proposals scheduled to receive an *i3* grant.

Who Claimed the Rural Competitive Preference and to What Effect?

About 38% of the total 1,698 *i3* applications submitted, and 39% of the 49 funded proposals made the rural preference claim. Those percentages are much higher than the percentage of rural students in the U.S., which suggests the bonus points attracted the attention of applicants. But in many cases, the “rural” effort was a very small part of a large, urban-oriented project.

Uniquely Rural Challenges

Rural schools share many characteristics with schools in other locations, but they operate in a fundamentally different context that produces unique challenges of the kind the rural competitive preference was supposed to encourage applicants to address. One unique challenge relates to teachers.

Recruiting/Retaining Teachers and Leaders

Small, rural high-needs school districts face challenges in recruiting and retaining teachers and school leaders that are different from those in high-needs schools in other locations. These challenges are related to a weak property tax base, failure of the state funding system to fully address rural characteristics, and geographic factors.

- Salaries are lower, benefits are trimmer, and there are fewer summer job opportunities than in larger communities.
- Teachers have less support in the form of teacher aids, special services providers, support personnel, and professional development opportunities.
- Teachers are often required to teach multiple grades and/or subjects and earn multiple certifications.
- Teachers and leaders must often take on one or more co-curricular responsibilities.
- There are limited choices for housing, entertainment, and social networks.
- There are far fewer jobs for spouses in local labor markets.

Such challenges mean that rural districts serving high-needs students in low-wealth communities struggle to find and keep teachers. An *i3* proposal focused on addressing any of these challenges would have earned its rural competitive preference points.

Rural Competitive Preference Claims by Grant Category

Scale-up: All four highly rated proposals (100%) in Scale-up, the largest category, claimed and won some rural preference points. All four are urban-based and focused. Scale-up required the most rigorous research base documenting the innovation. It also set very high targets for the numbers of students the innovation would reach. Rural districts lacked the ability to compete for Scale-up grants because there is insufficient rural research to meet the category's research requirements. Further, the relatively small scale of rural districts precludes the possibility of rural districts reaching the Scale-up category's scalability targets.

Validation: Seven of the 15 highly rated Validation grants made the rural preference claim.

Development: Most i3 applications (1,324) were in the Development category, where more than 38% of all applicants claimed the rural preference. Among the 30 highly rated Development grant recipients, only seven made the rural claim.

The Innovations

Was the innovation deliberately designed or redesigned to address challenges inherent in rural conditions rather than challenges that are universal in schools?

Most of the innovations involved in the highly rated proposals that made the rural claim are urban in origin. Only three of the 19 rural preference proposals originated in rural schools. By contrast, 15 rural preference proposals originated in urban settings, only four of which had been previously used in rural schools. The origin of one project is unknown. Other than the three projects that originated in rural schools, the proposals do not address how the project is suitable for or will be adapted to rural schools. Further, several projects are research projects where the research model requires that adaptations be avoided because they might invalidate statistical evaluation. Most applicants making the rural claim are using innovations that are not based in rural experiences and were vague about how rural schools will adapt the program.

The Extent Rural of Rural Participation

To what extent was the project actually focused on rural schools?

Most proposals were vague about the extent to which they would serve rural schools and even less clear about whether the schools were eligible for

the federal REAP program (as required by i3 rules) and/or high-needs. Two projects serve primarily or exclusively rural schools. In three projects, according to our best estimate, between 25% and 75% of effort is focused on rural schools; four more projects involve some rural effort (less than 25%); and six have minimal or no effort described.

Only nine proposals listed any rural districts as official project partners. Altogether it was possible to identify fewer than 150 rural districts that would be served by these i3 grants, and 60 of those districts were in one rural-originated proposal. An additional 52 districts were part of only two other projects. Three proposals therefore account for 77% of the rural schools or districts that we can say with confidence will participate in this round of the i3 program.

Substance of Claim

Was the rural claim deliberately presented and supported by substantive information? Is there a commitment to direct engagement in a high-needs REAP-eligible rural school or district? Does the applicant have substantive and relevant experience in rural schools and districts?

This factor goes to the question of whether the applicant provides evidence of having thought about what needs to make innovation work in a rural environment. There was very little specificity in most of the proposals. Moreover, only six rural preference applicants had sustained rural experience; seven had limited or very limited rural experience; and six applicants showed no evidence of experience working in rural schools.

The Money

To what extent will federal funding actually reach rural schools? Are rural schools listed as official partners?

Because project budgets were not posted on the Department website, it was difficult to determine what share of funding would go to rural schools. In most cases where rural districts were identified they were listed as "locations," rather than as "partners," the designation that generally suggests they are getting direct funding. It was impossible to make any determinations about seven of the proposals and in six more, rural schools would receive less than 10% of project funds.

The Review

How diligent were reviewers (readers) in giving and justifying rural preference points, determining whether the districts were REAP-eligible, and

assessing whether the research evidence for the project had been considered in a rural context?

Three subject readers and two technical readers reviewed each proposal; these readers awarded rural preference points and made notes. In only six of the 19 cases, were the three subject readers unanimous in awarding (or not awarding in one case) rural preference points. For the remaining proposals, readers varied widely in whether they awarded points, whether they awarded one or two points, and in their justifications for the points.

In a few cases, reader comments revealed awareness of rural challenges and consideration for the grant's rural criteria, but in most cases reader comments revealed a lack of understanding or of concern for the project's applicability to high need rural settings.

Most, though not all readers were also lax in determining whether rural schools were, in fact, REAP-eligible.

This discrepancy suggests a need for clarity about the preference points, standards by which to judge whether the project met requirements, and much better expertise on the part of reviewers about rural schools and their challenges.

Conclusions Regarding Use of the Rural Competitive Preference in i3

Our search for i3 proposals that are authentically rural – based on innovations that are expressly applicable in rural settings, clearly focused on rural schools, and serving high-needs rural students was disappointing. Only three proposals, in our judgment, reach that level of rural centeredness.

We found many proposals of urban origin and design, centered in urban institutions or organizations, serving primarily urban schools, reflecting little thought about rural context, and involving little more than enough rural participation to justify making the rural claim.

Four factors worked against the high rural expectations established in *i3* guidelines.

1. The threshold to qualify as serving a rural constituency was so low (one participating REAP-eligible district) that it attracted token rural inclusion in otherwise substantially urban proposals.
2. The rural claim was especially attractive because it was worth twice as much as any other competitive preference.
3. There was no scoring rubric that could guide readers in deciding whether the

proposal met the rural claim criteria of being “designed” to focus on the “unique challenges of high-needs students” in rural schools.”

4. Many readers were too willing to award rural claim points and made little or no justification for their decisions. This suggests that many readers were unprepared by background and experience to understand rural challenges or contexts.

The Wrong Remedy for a Bigger Problem

The Rural Trust review of *i3* suggests that the rural competitive preference was the wrong remedy for rural challenges much bigger than can be mitigated by two bonus points in a 100-point competition. A national competition is a poor vehicle for discovering innovative rural programs and practices. In addition, high-need rural districts lack the capacity to compete with large urban districts and national non-profits. These rural districts may earn the two rural preference points, but they cannot earn enough of the basic 100 points to win funding. Large institutional applicants, on the other hand, can compete for the 100 basic points and easily score the two bonus “rural” points without actually serving rural districts in meaningful ways.

High-needs rural districts are small in comparison to urban districts, poorly funded, and they lack specialized staff with time and financial resources to write large proposals. These same circumstances limit the ability of rural districts to build consortia with other districts.

Further, rural districts rarely have the attention of institutions of higher education or researchers, which limits the ability of rural schools to build a research base for their innovations.

Finally, high needs rural schools are among the most poorly funded schools in the nation. They lack local financial resources to support promising ideas, and they lack access to grant writers, foundations, and non-profits that can assist schools in finding or providing start-up or matching funds for new projects.

In the case of the *i3* program, the timeline from announcement to deadline was much too short for rural districts to build collaborative networks or create the capacity to bring an innovation to “scale.” Its research requirements were beyond the reach of rural districts. And, its requirement of a 20% match was doubtless so daunting it prevented many districts from even considering submitting an application.

Is There Another Way?

A better approach to the challenges of high-needs rural schools is to focus on innovation rather than competition *per se* by establishing a set-aside pool of funding only available to projects that address the unique challenges of high-needs rural schools and districts.

Segmenting competition for grants, as in sports, would level the playing field and provide a meaningful prospect for success. It would also increase the possibility of innovative work surfacing because it would put a fairer and stronger emphasis on innovations in the rural context.

The set-aside pool would give priority to proposals where the lead applicant is a high-needs rural district or a consortium of rural districts, rather than a non-profit or an institution of higher education. This would further enhance collaboration and innovation at the local level and target support to need.

A program of “prior support” would enhance innovation by providing additional lead time to develop innovative work that originates from the experience and ideas of high-needs rural schools. The program could also provide technical assistance in writing proposals and developing appropriate research and evaluation models to give small, low-resource districts a reasonable opportunity to participate. By targeting assistance to sub-state regions such as Appalachia, the Black Belt, the California Central Valley, the Hispanic

Borderlands, Indian Country, the Mississippi Delta and other regions where high-needs rural schools are concentrated, the program could reach the rural districts it purports to serve.

Finally, because there is so little research on authentically rural innovations, the effectiveness of the innovations should be carefully evaluated during the program. The work, however, should be innovation-driven, not research-driven. A school-based program that finds good ideas and helps people innovate them is much more practical than a university-based program that is based in theory and has little application. This means that the Department should support a research capacity prior to and during the application stage. Rural schools do not know and are not known by the research elite. We need to invent a rural education research capacity and i3 could help to do so.

Making Rural Matter

Rural schools are not miniature urban schools. Rural schools exist in a context fundamentally different from urban schools. Certainly both rural and urban schools share many common challenges. But they also face unique challenges. The i3 program, with a few exceptions, did not address the unique challenges of rural schools. “Making rural matter” in the quest for innovation will require greater attention to the distinct character of rural communities and greater reliance on rural people for ideas about how to meet the needs of their schools.

Rural School and Community Trust

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