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15 February 2018

The University Council for Educational Administrative (UCEA) offered the following commentary about the U.S. Department of Education's Report on Rural Education, Section 5005 of P.L. 114-95.

The UCEA is a consortium of over 100 U.S. higher education institutions committed to advancing the preparation and practice of educational leaders for the benefit of schools and children. UCEA fulfills its mission by:

- Promoting, sponsoring, and disseminating research on the essential problems of schooling and leadership practice;
- Improving the preparation and professional development of educational leaders and professors; and,
- Positively influencing local, state, and national educational policy.

**UCEA's Comments and Recommendations about
U.S. Department of Education Report on Rural Education, Section 5005 of P.L. 114-95,**

- a) To what extent has this document (December 2017) addressed the ways in which the U.S. Department of Ed. (Ed.gov) will improve its utilization of rural schools and local agencies (LEAs)' needs in ED.gov's policies and programs?

This document listed compliance strategies rather than improvement strategies. Although the Department reported 25 sample listening sessions about rural education, it failed to explain connections between those sessions and utilization of rural education needs in U.S. Dept. of Education policies and programs. Instead, this report describes ways that rural education agencies must adjust to the traditional processes in grants or allocations from the U.S. Department of Education and lists an appendix of existing funding sources for rural schools, significantly, omitting (a) ESSA, Title II, Part A, Supporting Effective Instruction or (b) Title VII (B) Homeless Children & Youth. Both are essential funding for addressing the capacity and retention of educators in rural areas as well as serving the most underserved students in homeless families living among rural communities.

- b) To what degree has this document described future efforts to increase rural schools & LEAs' participation in planning and implementing ED.gov's procedures, programs, policies, and regs?

The Department reported four existing steps for addressing rural education needs, and six additional actions that might be implemented. None of these steps addressed digital infrastructure options that affect any innovative solutions for increasing participation among rural education LEAs and their constituents.

- c) UCEA recommendations

Address rural students' and schools' needs with these steps

1. *Stabilize the rural educator workforce by providing current and aspiring educators, both teachers and school leaders, with affordable housing, pay incentives, and tuition for their work in rural schools*

2. *Develop rural communities' capacity for supporting economically and socially healthy rural communities ensuring student resiliency for their school and occupational success*
3. *Provide resources for university preparation programs that focus on rural school leaders; including underwriting rural residency programs*
4. *Offer funding models to local agencies that build regional partnerships among institutions of higher education, school districts, regional education laboratories, and intermediary organizations such as community service agencies*
5. *Provide incentives to regional partnerships which may not fit existing definitions of LEAs; for example, empower groups with formal contractual arrangements as opposed to traditionally legislated agency definitions*
6. *Develop communities of practice for principals and ensure funding for infrastructure utilizing virtual meetings with the necessary digital networks and connectivity for rural and remote locales*
7. *Offer school principals ongoing career-long development through coaching and mentoring to expand stability in rural areas' teacher workforce and school support personnel*

Rationale for UCEA's Comments & Recommendations

- a) To what extent has this document (December 2017) addressed the ways in which the U.S. Department of Ed. (Ed.gov) will improve its utilization of rural schools and local agencies (LEAs)' needs in ED.gov's policies and programs?

This document listed compliance strategies rather than improvement strategies. Although the Department reported 25 sample listening sessions about rural education, it failed to explain connections between those sessions and utilization of rural education needs in U.S. Dept. of Education policies and programs. Instead, this report describes ways that rural education agencies must adjust to the traditional processes in grants or allocations from the U.S. Department of Education and lists an appendix of existing funding sources for rural schools, significantly, omitting (a) ESSA, Title II, Part A, Supporting Effective Instruction or (b) Title VII (B) Homeless Children & Youth. Both are essential funding for addressing the capacity and retention of educators in rural areas as well as serving the most underserved students in homeless families living among rural communities.

Rationale for a). The U.S. Department of Education's Report provides a common misunderstanding about legislated policy when under-represented groups are not responsive and/or lack success in the existing system. That common misunderstanding is the perception that the system is rational, accessible, and applicable to the under-represented group. Rural education is not like urban education and one example of the difference is the lack of resources for grant and allocation funding. In a given urban school district, at least one person, if not an entire division, works on grants, contracts, and other allocations. In contrast, in most rural districts, the individual managing federal programs, may also manage buses and maintenance, or might be a high school principal who may also be the athletic director. The report's insistence that rural districts need to do a better job at grant and contract applications through more training (p. 16) fails to acknowledge the degree to which that personnel capacity has more to do with resource limitations from sheer size of the rural district work force to the number of hours in a day or week. While streamlining the processes associated with grants, allocations, and contracts would benefit all U.S. states, schools, and districts, that whittling of the process does not help a huge difference in staffing between urban and rural schools. For example, when a rural district's personnel work 60 or 70 hour weeks running the core of schooling, teaching and learning, no amount of training about the federal funding process alleviates the staffing issue. The problem is not misunderstanding, but limited resources.

- b) To what degree has this document described future efforts to increase rural schools & LEAs' participation in planning and implementing ED.gov's procedures, programs, policies, and regs?

The Department reported four existing steps for addressing rural education needs, and six additional actions that might be implemented. None of these steps addressed digital infrastructure options that affect any innovative solutions for increasing participation among rural education LEAs and their constituents.

Rationale for b). From pages 12 through 13 of the December 2017 report, the Department acknowledges the gaps in connectivity across the rural U.S. while reporting efforts to address those issues. However, much of this report is retrospective rather than innovative. The key understanding about digital infrastructure is that infrastructure is not a one-time, start-up investment. Instead, the

underwriting of such connectivity requires a sustainable level of maintenance and continuous improvement.

c) UCEA recommendations

Address rural students' and schools' needs with these steps:

- *Stabilize the rural educator workforce by providing current and aspiring educators, both teachers and school leaders, with affordable housing, pay incentives, and tuition for their work in rural schools*
- *Develop rural communities' capacity for supporting economically and socially healthy rural communities ensuring student resiliency for their school and occupational success*
- *Provide resources for university preparation programs that focus on rural school leaders; including underwriting rural residency programs*
- *Offer funding models to local agencies that build regional partnerships among institutions of higher education, school districts, regional education laboratories, and intermediary organizations such as community service agencies*
- *Provide incentives to regional partnerships which may not fit existing definitions of LEAs; for example, empower groups with formal contractual arrangements as opposed to traditionally legislated agency definitions*
- *Develop communities of practice for principals and ensure funding for infrastructure utilizing virtual meetings with the necessary digital networks and connectivity for rural and remote locales*
- *Offer school principals ongoing career-long development through coaching and mentoring to expand stability in rural areas' teacher workforce and school support personnel*

Rationale for c).

Seventy years after the 1944 White House Charter of Education for Rural Children ([Dawson & Hubbard, 1944](#)) detailed the differences between rural and “modern” schools, continued inequity persists ([Azano & Stewart, 2015](#); [Budge, 2006](#); [Burton & Johnson, 2010](#)), such as the ways that educational policy discriminates against rural students ([Jimerson, 2005](#)). In 2016, there were 8.9 million rural students in the US - more than all the students in New York, Los Angeles, and the next 75 largest school districts in the country combined ([Latterman & Steffes, 2017](#); [Showalter, Klein, Johnson, & Hartman, 2017](#)).

One of the most critical factors contributing to increasing teacher performance and students learning is the principal. In rural schools, high concentrations of poor students, low per-pupil expenditures, and low principal salaries exacerbate challenges of recruiting and retaining rural school principals who can effectively lead the improvement of student learning outcomes ([Browne-Ferrigno & Maynard, 2005](#)). Several scholars have studied the unique nuances of the role of the rural principalship that differentiate the complexity of their role from that of principals in urban or suburban contexts ([Bard, Gardener, & Wieland, 2006](#); [Canales, Tejada-Delgado, & Slate, 2008](#); [Masumoto & Brown-Welty, 2009](#); [Pendola & Fuller, 2018](#)). Despite these facts, the needs of rural schools continue to be overlooked and underfunded by federal and state agencies ([Howley, Rhodes, & Beall, 2009](#)).

Stability is needed for principals to develop a high-quality instructional culture within the school, grounded in issues of equity and continuous improvement. [Louis, Leithwood, Wahlstrom, Anderson, Michlin, and Mascall \(2010\)](#) suggested, “The main underlying assumption is that instruction will improve if leaders provide detailed feedback to teacher, including suggestions for change. It follows that leaders

must have the time, the knowledge, and the consultative skills needed to provide teachers support” (p. 11). Yet, such instructional expertise may be limited, due to lack of high-quality principal preparation specific to improving rural schools. The need for exceptional professional development for rural principals is critical, given demographic changes in rural communities and with increasing numbers of students for whom English is not their first language. Most lack training to support teachers of English Language Learners. Most rural schools have an underrepresentation of gifted and talented students, and an overrepresentation of students identified for special education services. Limited fiscal resources and poor “fit” (according to the prevailing community norms) make rural principalships less attractive to traditionally prepared job seekers than leadership roles in non-rural districts ([Fusarelli & Militello, 2012](#)). [Battle and Gruber \(2010\)](#) found that rural principals represent the second highest percentage of educators leaving the profession. [Fuller and Young \(2009\)](#) found that the stability of rural principals is among the shortest. Half of rural principals have left the field by the end of their third year ([Latterman & Steffes, 2017](#)). The daily realities of rural life can serve as a barrier for recruiting highly qualified teachers and principals ([Barley & Brigham, 2008](#)).

Programs that support the development of rural principals both pre-service and throughout their careers exist with demonstrable success ([Fusarelli & Militello, 2012](#) ; [Herman et al., 2017](#)). These models include the creation of communities of practice with on-site and virtual coaching sessions. Residency programs, though more expensive than traditional programs, offer aspiring educators an authentic and immersive experience in the rural setting. These experiences require supports such as affordable housing, and urban centers lead the way in inventive approaches that engage the community to revitalize the area ([Lindsay, 2018](#)). Innovators such as Seawall Development Corporation have turned deserted factory buildings and warehouses into affordable housing in Baltimore for teachers, at significantly under-market rental and reduced mortgage costs ([Perl, 2011](#)). Entrepreneurial processes such as this also can be done with existing vacant structures in rural communities.

Principal stability is central to a high-performing school. Unless students in rural parts of the country are equitably served in schools that are led by innovative principals who lead schools that provide every student with best instructional practices, the promise of federal education law to ensure that all students have equal access to high-quality educational practices will be broken.

Recommendations

- Provide a Rural Principal Support and Training Act (a subsidiary of the Rural Educator Support and Training Act), providing professional development, mentoring, coaching, and loan forgiveness program for educators serving as rural principals for five years.
- Develop specific funding for rural principal professional development, coaching, mentoring, and residency programs; provide high-quality ongoing professional development, coaching, and mentoring to support the practicing principal's continuing education in instructional leadership practices that are designed to improve schoolwide instructional practice and student achievement.
- Provide loan forgiveness and tax credits to rural principals who commit to working in rural schools for five years.
- Improve rural principal recruitment efforts through increased collaboration between rural school districts and postsecondary institutions that have specific programs designed for rural school and district leadership. Provide evidence-based mentoring and residency programs.

- Increase research on rural principal retention and turnover, including both school and community factors.
- Utilize the RELs to develop targeted supports and professional development.
- Provide incentives for university-school partnerships for 'grow your own' principal preparation programs.
- Expand university preparation programs that focus on rural school leaders and increase research on what factors contribute to effective preparation for rural principals in different types of communities, schools, and locales.
- Increase research on distributed instructional leadership to provide understandings of how principals can develop additional leadership capacity.
- Develop communities of practice for principals and ensure infrastructure and funding to support virtual meetings and travel over large distances.
- Develop a separate Department of Education program, specifically focused on developing high-quality rural principals and superintendents.
- Teach university faculty about the realities faced by rural principals – context-specific and different from urban, suburban leaders' needs.
- Strategically build highly productive inter-agency relationships and partnerships to support the development of principals who are deeply committed to improve rural schools so that every student in a rural school has access to high-quality, best instructional practice.
- Create a cadre of highly trained rural principals, along with their mentors and coaches, to create a new paradigm of high expectations and learning outcomes for rural schools.
- Establish Regional Leadership Academies to prepare and support transformative principals in rural school contexts.
- Bolster the preparation of rural principals by increasing support for principal preparation initiatives with a particular emphasis on funding models that seek to build regional partnerships between institutions of higher education, school districts, regional education laboratories, and intermediary organizations such as educational service agencies.