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Policy Brief

A Summary and Critique of the *Section 5005 Report on Rural Education: Final Report*

Devon Brenner

This policy brief summarizes and critiques the findings of the US Department of Education's [*Section 5005 Report on Rural Education*](#). In September of 2018, the Department of Education released the *Section 5005 Report on Rural Education: Final Report*. The report was written in response to a provision of the Every Student Succeeds Act of 2016 (ESSA) (P.L. 114-95) that called for the US Department of Education to critically examine its policies and procedures related to rural education. Section 5005 of ESSA, which became the name of the report, states that the Department of Education must "review the organization, structure, and process and procedures of the Department of Education for administering its programs and developing policy and regulation." Section 5005 required the Department to

- (A) Assess the methods and manner through which, and the extent to which, the Department of Education takes into account, considers input from, and addresses the unique needs and characteristics of rural schools and rural local educational agencies; and
- (B) Determine actions that the Department of Education can take to meaningfully increase the consideration and participation of rural schools and rural local educational agencies in the development and execution of the processes, policies, and regulations of the Department of Education.

Members of congress amended ESSA to include Section 5005 because of concern that policies and procedures in the Department of Education do not always take into account the needs of rural schools and that the Department does not adequately seek and consider feedback from rural LEAs in developing regulations and guidance. In developing the Section 5005 Report, the department conducted listening sessions and a self-assessment that led to an initial report, filed on Dec 20 of 2017. A sixty-day comment period yielded 36 public comments on the initial report, which were considered prior to the release of the final version.

The Rural Context

The report provides a brief synopsis of the state of rural education in the US. Citing NCES data, the report states that 28% of the nation's schools and 19% of students are rural. In general, the report states, rural schools are doing about as well as schools in urban and suburban locales, with comparable NAEP scores and graduation rates, although with significantly fewer students who go on to complete post-secondary education. For the most part, the report compares the challenges facing rural schools to those of urban schools, such as access to health care, poverty, teacher shortages, acknowledging that these are issues that are exacerbated by isolation, remoteness, and the small size of many rural districts. While acknowledging the diversity of rural communities, the report cites two significant problems facing rural schools: lack of personnel or capacity to compete for federal grants, and lack of broadband internet. In describing rural education, the report briefly mentions several other rural-specific challenges: geographic distances and isolation, transportation, amenities to attract and retain teachers, limited local tax base, and challenges offering advanced courses.

Overview of the Department of Education

The 5005 report begins with a brief but useful overview of US Department of Education. The Department of Education is a large organization, comprised of twenty-two separate Principal Operating Components including the Offices of Elementary and Secondary Education; English Language Acquisition; Innovation and Improvement; Special Education and Rehabilitative Services, and the Career, Technical and Adult Education, among many others. The department administers programs that provide funding for preK-12 education, including both formula grants issued to states and provided to schools and districts through sub-grants, and, to a much smaller degree (around 10% of its budget) discretionary competitive grant programs. The

Department also administers financial aid and post-secondary education programs, which are not detailed in this report.

More than one-third of the report's 39 pages are a listing and description of the offices and programs of relevance to rural schools and LEAs within the Department of Education (Appendix C of the report). For each, the report summarizes one or more initiative or endeavor that particular office or program has that might have something to do with rural education. For example, The STEM office held a summit in Romney West Virginia in 2016, the Teacher Quality Partnership Program had a rural priority in 2016, and the legislation that authorizes the Regional Education Laboratories (RELs) requires that at least a portion of the funding be dedicated to rural education research and technical assistance. This listing itself might be helpful to rural educators and advocates who wish to know more about the Department of Education and its component offices and programs. However, in listing and describing these offices and programs, the report does not evaluate whether these initiatives or set-asides have been effective.

Rural Stakeholders' Input

The report describes ways that various programs engage in rural outreach such as outreach to elected officials in states and rural areas and communicating to and through organizations that represent rural educators such as NREA, AASA The School Superintendents Association, and the Council of Chief State School Officers. The Department also communicates about programs and opportunities through relevant listservs and professional organizations, as when the Office of English Language Acquisition made announcements about the Alaska Native Children in School program that were disseminated to relevant listservs, tribal organizations and governments, and current grantees, among others.

The report describes a few specific examples of how rural stakeholders have been invited to give feedback on particular rural focused programs, such as meeting with rural education researchers in 2012 and 2014 that influenced the requests for applications for rural research grants and efforts to get feedback and improve the Rural Education Advancement Program (REAP, described below), and describes stakeholder meetings held in the development of the 5005 Report. The Department conducted special

listening sessions in person, in schools and states and in DC, sometimes combined with other visits to states (e.g., as part of the Secretary's "Rethink Education" tour) to collect information about rural education and to obtain stakeholders' views about the work of the Department. The report states that the Department conducted "dozens" of listening sessions with "hundreds of rural stakeholders" (p. 5) in the development of the Section 5005 Report.

Addressing Rural Education

The report touts some things the Department is doing for rural education. A few highlights:

- *REAP funding*: The most specific program administered to support rural schools is the Rural Education Advancement Program, including both the Small Rural School Achievement (SRSA) and Rural Low Income School (RLSI) programs. The REAP program provides small, relatively flexible grants to rural schools. Prior to the passage of ESSA the Department studied the way it implemented the REAP program, and has recently made changes to Technical Assistance, the web page, and the timeline intended to increase the percentage of eligible districts that complete and apply for REAP funding. These changes are meant to make it easier for districts to receive REAP funding—a significant number of eligible schools have not claimed the REAP funds for which they were eligible.
- *Webpage*: The Department has a website where it posts information deemed relevant to rural education. The [Rural Education Resource Center](#) has links to resources (e.g., the National Center for Education Statistics Rural Education in America page with a variety of rural education data, the national 4-H program, etc.) and information about programs (e.g., REAP), and news and blogs that may be relevant to rural educators.
- *RELs and Research*: The federal government has invested resources into research and research dissemination in order to advance evidence-based practice. To that end, some effort has been made to allocate research funding in a way that ensures that at least some research addresses challenges of rural education. The Department cites a few of these, including the requirement that 25% of funding for Regional Education Laboratories (RELs)

must be allocated to address rural education issues and a national research and development center with a focus on rural education research, which was recently recompleted.

- *i3/EIR*: The Report also cites the Education Innovation and Research program (EIR), and its precursor, the Investing in Education (i3) program. By congressional mandate, both EIR and i3 were required to provide funding to test and evaluate field-initiated interventions, with a funding priority for projects in rural LEAs. There has been some work to synthesize findings from the first round of i3 grants and [implications for rural education](#) (Fox, et. al., 2017).
- *Technology*: Because connectivity is a challenge in rural schools, the Office of Educational Technology has published resources, including case studies and a “learning guide” to help rural schools improve both infrastructure and technology to support learning.

The report cites these and other activities as ongoing efforts to address the needs of rural schools. The report also describes some recent changes the Department has made that it describes as of benefit to rural education. The report describes the creation of the Office of Rural and Community Engagement (ORCE) which has been tasked “to coordinate and expand the Department’s outreach and communications with rural education stakeholders” (p. 13). ORCE replaced the previous Deputy Assistant Secretary for Rural Outreach. ORCE plays an important role in outreach and communication, but does not have a specific or explicit role in policy making or implementation at the Department. Without resources, authority, or a clear policy function, ORCE may not be able to provide the Department with key input to ensure that the needs of rural schools are addressed in the Department’s programs and functions.

The report also touts rural priorities for discretionary grants as a way the Department is meeting the needs of rural schools. In March of 2018, the Department published the Secretary’s Supplemental Priorities for Discretionary Grants. These priorities can be applied in the requirements for proposals to discretionary grant programs administered by the Department of Education. The report describes five of the Secretary’s eleven priorities as relevant to rural education, including priorities for increasing educational choice, expanding computer science education and access to technology in rural schools, and priorities for rural in

grants that promote access to effective teachers, leaders, and instruction.

Steps the Department Plans to Take

The report lists seven steps the Department intends to implement to increase rural stakeholders’ input and address rural education. These seven steps include:

- *Work Group*: Create an Intra-Agency Rural Work Group comprised of all of the offices and programs that do work that involves rural education to share practices and improve both input from rural stakeholders and dissemination to rural schools. The Work Group will be led by ORCE.
- *Listening Sessions*: The Work Group will continue to lead rural listening sessions with a variety of stakeholders both in person (e.g., in states, at national and regional meetings and conferences, in DC) and virtually or by conference call, and share conversations both internally and with rural stakeholders.
- *Grant applications*: The Department will continue to streamline and improve the grant application processes.
- *Training to schools and LEAs*. The Department will continue and expand the technical assistance related to the REAP program and for other grant programs. For example, training on how to use the “G5” system. Training will also support LEAs in ensuring that online education resources are accessible to individuals with disabilities.
- *Interagency Collaboration*: The Department plans to work with other federal agencies to implement the recommendations of the Interagency Task Force on Agriculture and Rural prosperity, focusing on connectivity, educational opportunities, housing, and the workforce in rural areas, e.g., by increasing access to apprenticeships and identifying strategies for addressing crisis in rural communities.
- *Communication Plan*: The Department plans to develop a communication plan to address both dissemination to and input from rural stakeholders, including updating the Department’s rural education web page, sharing more information about grant competitions, and identifying key points of contact in states.
- *Updated Data on the State of Rural Education*: The National Center for Education Statistics (NCES) is currently working on an update to the

Status and Trends in Rural America report originally published in 2007. Due in 2019, the report will provide rural classifications and updated data tables. NCES is also working to release rural-focused NAEP data—which was supposed to have been available by the end of 2018.

In general, these are positive steps the Department can take. However, the report provides very little detail about how these steps will be taken and whether sufficient resources and staff are available to ensure their success. There is no timeline for implementation, and nothing in the report suggests how or whether the success of each of these steps will be evaluated. Rural stakeholders' input will be required to ensure that the steps taken on behalf of rural education actually benefit students and schools in rural communities. Apprenticeships, for example, may thrive in communities where there is a stable foundation of skilled, well-paying employment opportunities, but may be more challenging in very remote communities where transportation and other barriers exist, or places where economic opportunities are shifting to new industries such as cyber security and digital technologies.

Conclusion

The 5005 Report provides a helpful overview of the Department's offices and programs that directly impact rural education that may prove useful to rural educators and advocates, however, it falls short of the 5005 mandate to self-assess and determine actions to be taken. The Department engaged in listening sessions and sought feedback from rural stakeholders, but does not seem to have incorporated feedback from key stakeholder organizations (e.g., [AASA and](#)

[Rural School and Community Trust](#), [The University Council for Educational Administration \(UCEA\)](#), the [National Indian Education Association \(NIEA\)](#), and the [National Association of Federally Impacted Schools](#)). The Department commits to increasing listening sessions and improving communication, but is not clear that rural input is or will be “baked into” the system to ensure that rural communities are considered in every facet of the Department's work, particularly rulemaking. It is important that the constraints and strengths of rural communities be considered in the rulemaking process. Guidance and regulation around issues important to rural contexts, from immigration to civil rights to Title IX compliance to requirements for school nutrition, may impact rural students and schools in ways that cannot be imagined from within the D.C., particularly in communities with teacher shortages and limited resources, from remote one-room school houses in frontier Montana to the hollows of Appalachia. As we have discussed in this column recently, federally funded research should include the generation of practice-based evidence (See [Eppley, Azano, Brenner and Shannon, 2018](#)) which can generate evidence not only about whether interventions work, but in what contexts and for whom. Finally, teacher staffing may be the biggest issue facing many rural schools in the U.S. The report does little to address this concern.

It may be that a single report for a general audience about how an agency as large and complex as the US Department of Education is not actually possible. However, the *Section 5005 Report on Rural Education* seems like a missed opportunity to deeply engage and take the mandate to “meaningfully increase the consideration and participation of rural schools.”

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