Ms. Molchanow,

I would like to submit the attached letter containing my comments regarding the proposed Chapter 4 rulemaking associated with the elimination of strategic planning. It is my hope that my insights will contribute to further discussions regarding this issue. In addition, I hope my submission today is within the 30 days of its publication in the Pennsylvania Bulletin on October 6, 2012.

Respectfully,

Jason A. Conway

Visit the CP Home Page at: http://tinyurl.com/CP-PDE-Home

Please consider joining the CP Listserv at: http://tinyurl.com/CP-Listserv

"Visionaries dream with their eyes open, while others keep their eyes shut to awaken to status quo."  --- Dr. Franklin Delano Reese
This message is intended only for the use of the addressee and may contain information that is privileged and confidential. If you are not the intended recipient, you are hereby notified that any dissemination of this communication is strictly prohibited. Please contact me immediately if you have received this communication in error.
Honorable State Board of Education:

As the statewide project director of the Comprehensive Planning (CP) project for the Pennsylvania Department of Education (PDE), I respectfully offer the following testimony regarding the proposed elimination of the State-prescribed strategic plan requirements from Chapter 4 and the deletion of the current language in that section. The proposed language provides for the transition from a strategic plan to specific isolated plan components required under other regulations. This testimony represents my personal perspective on the proposed language for Chapter 4 and does not, in any way, represent the official stance of PDE nor my employer, the Capital Area Intermediate Unit. I welcome any opportunity to provide further testimony in front of the State Board of Education at your request.

Unfortunately, this attempt to reduce the burden of LEA planning actually further complicates their efforts and creates isolation, confusion and uncertainty in the field. These proposed revisions appear to have been developed and passed by the State Board of Education without the knowledge of a successful PDE initiative known as Comprehensive Planning, aimed at reducing the regulatory burden on LEA planning. I believe the State Board of Education is missing an opportunity to reduce more effectively the burden of LEA planning if it chooses to finalize the revisions as currently proposed.

Currently, in accordance with the proposed changes to Chapter 4 of the Pennsylvania School Code, school entities (Districts, AVTSs, IUs and charter schools) are required to develop several plans associated with professional education (Chapter 49), teacher induction (Chapter 49), student services (Chapter 12), special education (Chapter 14) and gifted education (Chapter 16). Additionally, school entities and their schools not attaining the student achievement goals of the Commonwealth, in compliance with requirements of the ESEA of 2001 (NCLB), must submit improvement plans. Ignored in the Chapter 4 revisions are other required planning processes mandated by state and federal requirements, including plans for special education, Title I and educational technology.

Based on the following testimony, I recommend that the Chapter 4 revisions recognize the Comprehensive Planning process to be the state sanctioned process and data collection tool to satisfy the chapter planning requirements, the NCLB required planning and additional state and federal planning mandates.

I offer the following testimony based on the:
1. recorded LEA needs of a CP process,
2. complexity of regulatory requirements made simple by the CP process,
3. unifying quality of the CP process with PDE initiatives,
4. recorded and observed field experiences of LEAs and schools using the CP process &
5. adaptability and relief offered by the CP process.

During the spring of 2010, PDE commissioned a research study to analyze and make recommendations regarding the planning processes and tools used by LEAs and their alignment with the school improvement processes and tools. The study identified the need for a
comprehensive process and tool that aligns LEA planning and school-level planning. (The study is available for download at: http://tinyurl.com/PDE-2010-SP-Study. Because of the study’s findings, PDE created and funded the CP project.

Under the direction of PDE, the Capital Area Intermediate Unit and the Delaware County Intermediate Unit collaborated to design and develop a single, streamlined, yet systemic, comprehensive planning process and plan management system for LEAs and schools within the Commonwealth to ensure:

- Consolidation, simplification of planning, thus reducing the burden on LEAs.
- Alignment of District Level and School Level Planning promoting planning as collaborative, coordinated and representative of the participation of all stakeholders.
- Development Charter School, Career and Technical Center and Intermediate Unit specific versions to better meet the needs of these types of LEAs.
- Alignment to addressing performance levels identified in the areas of Academic Achievement, Safe and Supportive Schools, and Human and Fiscal Resource Allocation and Stewardship.
- Access to tools that will assist them in addressing performance levels LEAs are provided Standards Aligned Systems assistance to overcome deficiencies in aforementioned areas.
- Development of a data collection system for researching and promoting best practices.

In the past, these plans were submitted at different intervals and as the research study found in isolation of others in their LEA. The creation and submission of these former plans were formerly facilitated through separated use of the eStrategic planning (eSP) tool and PASIP.com. CTCs, AVTSs, Charter Schools and Intermediate Units submit a lesser number of plans at different intervals as well.

Despite the proposed Chapter 4 revisions, the CP Process and associated web application is the most logical choice to serve as the vehicle used by school entities to satisfy their professional education, induction, student services, special education and gifted education requirements. Approximately 750 school entities (school districts, area vocational technical schools and charters) will need to develop the required plans and the CP Process and web application meets the needs identified during the 2010 research study. During the 2011 and 2012, 154 districts and at least 472 schools used the new CP process and its associated online web application. In summer and fall of 2012, 267 LEAs (including Charter Schools, Career and Technical Centers and Intermediate Units) were trained on the CP Process and have begun their planning efforts. Respectively 230 and 77 LEAs are scheduled to be trained and begin the CP Process during the summer of 2013 and 2014.

Additional Planning Requirements
Planning is not only required by the board of education chapter regulations of 4, 12, 14, 16 & 49, but also by federal mandates. The following describes the various federal planning requirements that the CP project also supports:

1. The CP Process and associated web application also serves as the vehicle for school entities, which have been identified as needing improvement or in corrective action, to meet their federal planning requirements. In September 2011, 18 school districts, 432 school buildings, 40 charter schools and 14 area vocational technical schools were identified as needing to develop improvement or corrective action plans as required by NCLB. These plans were to be submitted via the CP web application by August 30, 2012.
As in the past, the number of entities required to create improvement and corrective action plans will increase as the NCLB targets increase.

2. Approximately, 1,871 Title I school buildings (including charters) are required to submit plans. One of the goals of the CP project is to identify a way to consolidate and incorporate Title I planning into the CP web application.

3. Approximately, 100 school districts will use their district level plan created within the CP web application as part of their eRate Priority 2 funding.

4. Approximately 750 school entities will use the CP web application to satisfy federal reporting and planning requirements associated with special education.

Review and Approval
Each of the plans described has some level of review and/or approval, which requires technical and human resources to conduct. The CP project provides coordination and relief to PDE by carrying out these tasks. It is difficult to parse out all of the individual PDE staff responsible for conducting reviews, since multiple staff carry out various plan approval steps. For example, the Special Education Plan is reviewed and approved by field staff, while five different Division of Planning staff review the Chapter 4 portion, in addition to reviewing and signaling approval of the Professional Education and Teacher Induction portions. These assignments are divided out among them on a regional basis, and each has an additional significant program assignment in addition to plan review and approval. The CP project team has the capacity to organize and secure the needed resources for reviewing and approving plans. The CP web application has the ability to review plans for completion, create reports for PDE's review and be the platform that plans are reviewed and approved by PDE and/or designees.

Costs
Given the sheer number of plan requirements described, the number one cost of the CP project is salaries and benefits of team members. Once the proposed Chapter 4 revisions are approved, and incorporating the IU, AVTS and Charter school planning content into the CP web application, (scheduled for the FY 12-13), the application development costs will begin to decrease to a level of maintenance and contracted enhancements.

Despite the proposal to remove strategic planning, other planning requirements will force the need for continuous training and support. Therefore, the CP project will need to provide the human resources. Starting in FY 13-14, the cost of this coordination becomes consistent and in subsequent years will reflect normal cost increases in salary and benefits. Services will include training and support, coordination of the review and approval processes, reporting services to PDE and maintenance of the web application.

The CP project has already become a cost savings to PDE. Even during FY 11-12, where the application development costs were to be at its highest, the project cost was $605,000 less than the previously isolated projects (eSP and PASIP) in FY 08-09. This is a significant cost savings of 31% when comparing to the FY 08-09 operational costs of $1,939,238.

Introduction to CP Process
The following narratives are excerpts from a video production explaining the process. The video can be viewed at http://tinyurl.com/CP-Highway-Video.

The CP Process has been compared to a trip on a highway of continuous improvement from an identified origin to a prescribed destination. If we were to plan a scenic trip from Cleveland, Ohio, to Peekskill, New York, on U.S. Route 6, there would be several towns through which we

The “Towns” on the Comprehensive Planning Highway
Profile—the first “town” encountered on the Continuous Improvement Highway—may be the most important of towns because all other deliberations should occur within the context of a District’s mission and vision. The next two towns—Core Foundations and Assurances—are populated with reflective questions and requirements that arise from the various regulatory chapters with which Districts must comply. These plan components have been vetted and approved by the PDE Bureau Chiefs responsible for assuring compliance with regulations. Note that Core Foundations are part of LEA planning, i.e. school planning teams do not need to consider Core Foundations.

The Accomplishments and Concerns town provides an opportunity to identify those things that can be celebrated, as well as identifying those things that are the most significant worries faced by the LEA. The conversations and deliberations centered in the previous “towns” are brought to bear in Analyzing Systems, the next town on the highway. It is at this time when a planning team considers the system characteristics associated with Guiding Questions in order to identify Systemic Challenges. Once identified, LEAs will enter the Prioritize Systemic Challenges town.

As on any highway, there are on and off ramps and crossroads in the CP Process of which a user can take advantage to access optional activities and tools, if doing so is motivated by needs specific to the school or LEA. These activities have been identified as helpful by users, e.g. detailed data walkthroughs, which a LEA or school may choose to engage if doing so is determined to be potentially useful.

Just as all of the towns along Route 6 from Meadville to Carbondale are in the same state, the components from Core Foundations through Prioritizing Systemic Challenges are in the Needs Assessment Component of a Guided Planning Structure, which is a foundation of the CP Process and the process whereby planning teams determine which Systemic Challenges will be the focus of Action Planning. Because CP is a continuous improvement process, periodically the District must fly back to the first town—Profile—and then repeat the journey along the highway, making changes in each town. The changes should reflect a LEA’s or school’s changing internal and external environments, as well as reflect the inputs from monitoring the implementation and effectiveness of Action Planning. Having come full circle, planning may continue, planning cycle after planning cycle.

The Importance of Data
To travel on any highway, fuel is needed to power a vehicle. Combustion of gasoline provides the energy to move the vehicle forward. In CP, it is data that fuels the process. Like the combustion of gasoline, analysis of data is what provides the energy or impetus to move the process forward, and when traveling to and through the towns on the Highway of Continuous Improvement, data must fuel the conversations, the deliberations, and the decision-making. Analysis of data also provides the impetus for monitoring the implementation and effectiveness of Action Plans as evidence is sought to verify that Action Plans are being implemented as designed and to determine whether or not Action Plans are effectively meeting goals. Even the Assurances component requires a planning team to analyze data to identify current gaps in compliance that must be filled.

Dr. Jason A. Conway Testimony
Considering the Complexity of Systems and Subsystems
While all of the towns on the Highway of Continuous Improvement are essential stops in the CP Process, there is one "town" that is the core of the Guided Planning Structure within CP: Analyzing Systems.

An LEA is a highly complex system within which are many complex and interacting "sub" systems. Schools are also complex systems comprised of interacting subsystems. For purposes of understanding and analysis, subsystems can be placed into logical groupings, e.g. Academic Achievement Systems, Resource-Related Systems, or Safe and Supportive Schools Systems. Core Foundation queries, Guiding Questions, and subsystem-related data analysis can provide insights into the workings of the various subsystems within a LEA; however, for planning purposes, planning teams should consider the LEA or school comprehensively to understand the interactions of subsystems and components of subsystems to identify those high priority Systemic Challenges, i.e. systemic deficiencies, that are the most likely reasons why the overall system—a LEA or a school—is not producing desired results.

Action Planning begins with the identification of which Systemic Challenges the LEA or school has—or is likely to have—the capacity to address, which is followed by the creation of Action Plans that utilize proven strategies likely to eliminate or diminish the Systemic Challenges; doing so is the goal of each Action Plan. It is important that planning teams design Action Plans by looking in a comprehensive way at the complex system that is a LEA or a school, always considering how impacting one subsystem is likely to impact other subsystems.

If strategic planning is considered a process an educational entity uses to determine the actions needed to allocate its resources over an extended period of time so that it effectively meets the expectations delineated by its mission and vision statements, then CP can be considered a form of strategic planning. That said it is important to understand the Systems Analysis component of CP is unique among strategic planning models because the Systems Analysis tool allows Systemic Challenges to be identified regardless of school or LEA capacity to analyze data. The acknowledgement of data analysis as the fuel that provides the impetus to drive through every component of the CP Process—data analysis is not a town visited once in a Highway of Continuous Improvement—also distinguishes the process from other strategic planning models.

The Comprehensive Planning Web Application
A third characteristic that sets CP apart from other planning processes is the existence of a user-friendly and flexible web application that mirrors the CP Process. The CP web application not only provides an efficacious mechanism for guiding and documenting the development of LEA or school level plans, it also provides a tool for conducting research that will allow PDE and IUs to determine future development needs, as well as providing these entities with an opportunity to determine which Action Plans were most effective in addressing specific Systemic Challenges. The CP Process and the associated web application have been entirely designed and assembled by Pennsylvania educators under the auspices of the Pennsylvania Department of Education on behalf of Pennsylvania’s children. (End of video excerpts)

Comprehensive Planning is a Unifier of PDE Initiatives
The CP (CP) process and its web application currently unify PDE initiatives and their adaptability for future PDE Initiatives inclusion. The CP Process and its web application are adaptable to any changes in regulatory/initiative driven requirements. For instance, reflective tools and questions may be added, deleted or revised to unify future PDE initiatives under CP. The essential components of the process have been well received by the field because they are understandable and meaningful in relation to the systems associated with LEAs. It efficaciously
yields systemic challenges that can be evaluated and prioritized based upon the degree to which addressing those challenges will impact student performance, fiscal responsibility and the safety of schools. Educators in the field are likely to be more positively disposed to a change in content in an unchanged process than they would be to a change in process, regardless of changes in content.

**Regulatory Requirements**
The CP Process satisfies the planning requirements identified in chapters 4, 12, 14, 16, 49 and NCLB. This integrated guided planning system guides LEAs through a reflective exploration of their core values and foundations. It promotes planning as collaborative, coordinated and representative of the participation of all stakeholders. It provides access to tools that assists LEAs in addressing their performance levels.

**Performance Profiles**
The CP Process aligns with the future release of Performance Profiles. The CP Process provides LEAs opportunities to analyze their existing practices in the areas of Academic Achievement, Safe and Supportive Schools and Human and Fiscal Resource Allocation and Stewardship. Therefore, if an LEA’s performance in any one of these areas is less than favorable, the CP Process provides specific systemic content for them to analyze and develop action plans to overcome their systemic challenges.

**Standards Aligned Systems (SAS)**
The Core Foundations section of the CP Process is organized by the six elements of SAS. In addition, when users are analyzing their systems they will be able to access related SAS content associated with the three performance areas.

**Common Core Standards**
Within the Core Foundations section, LEAs have the opportunity to identify their progress towards mapping and aligning the Common Core Standards with its curriculum. Therefore, PDE and IUs are able to track their progress and offer assistance and interventions.

**Educator Effectiveness**
The content of this initiative is embedded in the CP Process. Characteristics of the Danielson model populate the reflective questions and systems analysis of instruction and leadership. This initiative will eventually produce data that should be analyzed at the PDE, IU and LEA levels. The CP Development Team plans to create optional data walkthroughs that will guide IUs and LEAs.

**PVAAS and eMetric**
The content of this initiative is embedded in the CP Process. Optional data walkthroughs have been developed and are being used by LEAs.

**Classroom Diagnostic Tools, Keystone to Opportunity & Instructional Coaching**
These initiatives are indirectly embedded in the CP Process. LEAs are encouraged to consider local relevant data as it relates to the three performance area systems. In the future, optional data walkthroughs can be created that will guide IUs and LEAs.

**Future Federal and Foundational Grants**
The CP web application is a data collection system. It can be used for identifying specific deficiencies of LEAs at the state and IU level. In addition, it captures the accomplished LEA
goals, which can be used for researching and promoting best statewide practices. In both instances, this data can be used for major federal and foundational grant applications.

**What is the field saying about Comprehensive Planning?**

At the beginning of March 2012, Phase 1 Districts were asked to participate in an online survey that measured their LEA’s status of completion of the CP Process and their satisfaction with the CP Process. Superintendents, directors, supervisors, and others recorded 100 responses from all but 4 intermediate units (excluding Philadelphia and Pittsburgh). The chart below shows their completion status at the time of the survey of the different components of the CP Process. There were 4.6 “Yes” responses for every 1 “No” to whether the CP Process enhanced the quality of LEA data and systems analysis, as well as action planning. In addition, there were 5 “Yes” responses for every 1 “No” to whether they would recommend the process of CP to a LEA located outside of Pennsylvania. Of those respondents who had not started or were too early in the CP Process, many of them responded “Unsure” to these two questions. Lastly, it was reported that 193 schools were required by their LEA to participate in the CP Process despite making AYP. Respondent open-ended comments are located in Appendix #4 of the document.

At the direction of Secretary Tomalis, the CPDT needed to secured information regarding the implementation of the CP Process from field practitioners. First, CPDT met with the PAIU Curriculum Coordinators on April 12, 2012 to discuss their observations of the CP Process implementation to date. Generally, the feedback was positive. (See Appendix #5 for compiled discussion notes.)

In addition, on April 19 and April 20, 2012, thirteen administrators from randomly selected, Phase 1 school districts, participated in telephone interviews conducted by an independently contracted educator, Dr. Carol Howard. Dr. Howard has no ties to PDE, the CP Project, CAIU, or DCIU. All participants were emailed the interview questions ahead of time and were asked to select a convenient time. The follow paragraphs provide an overview of the phone interviews, as well as a summary of the responses to the questions.

Most of those interviewed had participated in various iterations of Strategic Planning processes and found significant improvements with this new approach to planning. The randomness of the interview selection allowed input from small rural districts to much larger, more affluent districts. Many of those who clustered into the 11 districts, which will be referred to as the majority group, were new to a comprehensive planning process and had few criticisms. They typically expressed appreciation and were satisfied that their Action Plans were going to be implemented at both building and district levels. The two districts in the minority, expressed the desire to control their own planning processes. Both administrators seemed to be knowledgeable about complex data analysis, up-to-date technology, in-depth committee work, and the nature of systemic planning.

Most participants expressed confidence that this planning tool, when available live online will be much more user-friendly than in the past. The majority group appreciated the structured steps, the guidance for pulling together various entities in the process, and the streamlining. Several stated that the framework made it easy to hold committee meetings and keep everyone focused. One person gave high praise to the document for being so up-to-date, including every subject area, grade level, Common Core Standards, SAS, and everything necessary because their office staff is currently so small. Many districts that reported benefiting the most, initially considered the process too time consuming, with several administrators stating that they were “forced” to use this “burdensome” tool. However, when looking at the results, they experienced surprise that they had learned so much about their own districts. Now they are empowered, armed with
reports that can justify their Action Plans and be easily communicated to school board and community members. Many district representatives mentioned the CPDT as being an effective trainer and an excellent resource to call upon as needed. Many majority group districts were heavily reliant upon their own local intermediate unit Representative, as well.

All of the administrators in the majority group expressed some form of surprise about the information that the process revealed. They discovered that they needed the plan’s assistance to identify systems to improve academic achievement for their students. In one small district, they now have plans to replicate some instructional practices identified in a building that is getting better results than a neighboring building. All of the participants exclaimed over the rich conversations that took place during the process. For example, one district was determined to find out why the 11th grade PSSA writing scores were so much higher than the 5th grade writing scores. As new understanding evolved by following the Guided Questions, the Action Plans that followed made sense. Many of the participants noted that it in the past it was difficult to set priorities because everything seems to be important. One Curriculum Director discovered that this process brought specificity to each level of planning. One administrator revealed that teachers were finally “forced” to look at data, own the process, and anticipate results. In early April, he had the pleasure of watching a teacher burst into his office with pages of DRA scores demonstrating significant growth.

The majority group received quite a few surprises in this area through the process of the long meetings and careful analysis. Some districts studied patterns of how support staff were being used in their buildings and are going to shift personnel next year. Many principals could now see the whole picture at the district level more so than they had in the past. One administrator noticed how much emphasis his district had been giving to negative behaviors like bullying and stated that this approach “forced” the committee to focus on positive trends with the students. One Superintendent was very surprised to realize that district communication goals needed some enhancement and they had a lot more work to do with parent involvement. Several districts reported much more sharing of information and data with the Special Education Department. One administrator stated, “Our Special Education Director is much more involved in all the schools, since this planning process brought us all together for so many meetings.”

All of the administrators in the majority group revealed some level of frustration about budget limitations, with one expressing fear that his district’s budget would drive decision making more than the Action Plans. Nevertheless, several spoke of gratitude for this tool for current and future planning. The process helped those set priorities that can be defended in front of a school board, during collective bargaining, and with the community. One official said, in years to come they can refer to the plan to help stay on course with their identified priorities. One district planned major changes for 2012-2013 for their use of Title I funds. Another district used a school board presentation to urge the board to follow the plan’s priorities. As a result, the board will defer some school bus replacement costs to set aside money for Action Plan items. Another comment was that the Action Plans helped during collective bargaining by offering more Professional Development differentiation for the teachers and instituting “choice days.” The final example in this category is from a district whose school board was planning to use attrition for budget savings. The analysis process made them realize that test scores were low in two schools partly due to a lack of academic and behavioral interventions. The school board agreed to keep one Special Education Teacher to serve both schools. While not optimal, they are optimistic that this solution will serve a real need for the students and staff.

There was nearly total agreement among the majority group participants that this would be the tool of choice whether or not district level planning is optional in the future. A few skeptical
comments had to do with the learning curve, the high literacy level of the language involved, the user-friendliness of the tool, and the deadlines involved. One district was given the option to not plan for the high school since they were in AYP warning status, but opted to do it anyway. Their intense work resulted in the hiring of a new Math Coordinator, revising all of their math courses and a complete curriculum alignment at the high school.

Only one district in this small sample expressed interest in planning on their own. One of the two minority superintendents concluded that his preference was to use a consultant for Strategic Planning. He stated that the tool itself is not important and the value comes from the process of communication, analysis and implementation of changes leading to results. The second minority administrator reported her district’s planning process to be adequate for their needs. It is systemic, ongoing, and complex with many effective standing committees providing common language and continuity throughout multiple year spans. Therefore, that district would like to have the option to report their own findings and demonstrate that they can come up with plans that are equal in rigor and detail to the new process. One administrator who had just led his teams through a long involved process was concerned that his teams might have to do this all over again in three years. While he expected to do yearly updates on aspects of the Action Plans, he did not want to have to start all over again with areas like Mission and Vision statements.

**Comprehensive Planning is High Adaptability**

The CP Process was not designed for a specific measure of accountability; rather, as a planning process, it was designed to address via language changes any measure of accountability that might arise. The essential components of the process are well received by the field because they are understandable and meaningful in relation to the systems associated with LEAs. Because of this, educators in the field are likely to be more positively disposed to a change in content in an unchanged process than they would be to a change in process, regardless of changes in content.

For example, if it were determined that measures of accountability will be related to Performance Profiles, the basic CP Process can be enhanced, but not altered in form. The components that comprise each Performance area has been cross-referenced to System Characteristics associated with Guiding Questions. If a LEA Performance Profile indicates that 5 specific components of the Academic Performance level were the obvious computational causes of a failing grade, the CP tool would indicate which systems (and which characteristics) are associated with those specific components; reviewing the list of desirable characteristics of each system would allow a planning team to identify systemic deficiencies that may need to be addressed.

If Performance Profiles are selected as the source of measures of accountability, and if it has components that do not appear to be aligned with the System Characteristics associated with Guiding Questions, the Characteristics and Guiding Questions can be enhanced in the same manner that they were enhanced after a crosswalk with the Core Foundations. The Core Foundations are based upon regulations. As state and federal regulations change, the Core Foundations can quickly be altered or deleted as needed along with corresponding language changes in other sections of the CP tool.

**CP Process Provides Relief**

According to Edward Meich, prior to 1994, there was only one empirical study of the relationship between strategic planning and educational performance as measured by standardized tests: the study found an “inconsistent and weak” association between participation in strategic planning
and student success*. Strategic Planning originated in the business community in the 1960s in an attempt to combine short-term and long-term planning. David Conley (U. of Oregon) claimed in 1992: “The descriptions of strategic planning in education are so different from its use in the private sector as to raise the issue of whether the educational model has diverged so far that it deserves some new name.” CP is a more appropriate alternative!

Challenges of Strategic Planning Require Relief
1. Most strategic planning is linear, which relies upon the belief that an organization’s internal and external environment is highly predictable over time and/or that the organization has significant control over the environment.
2. “Planning is widely considered to have a voracious appetite for financial and human resources...organizational resources are displaced towards planning rather than delivering services.”
3. “There can be no planning without the ability to cause other people to act differently than they would otherwise act. Planning assumes power. Planning is politics. Most organizations resemble a set of shifting coalitions rather than a military dictatorship.”
4. Successful creation of plans is sometimes impeded by intellectual limitations of planners; successful implementation of plans often rests upon people who were not involved in creating the plans.
5. Books and consultants provide detailed and extensive planning programs that address analysis and identification of challenges, but there is a dearth of any instruction related to creating strategies.
6. Strategic planning usually does not include processes for the identification and implementation of strategies needed to respond to unanticipated and unplanned events that occur after a strategic plan is approved and implemented.
7. Available quantitative data is commonly too limited in scope, too aggregated, too difficult to obtain, and too often unreliable and too late to be useful.

How the CP Process provides relief from strategic planning?
1. The resources required by the CP Process is appreciably less than that required by full implementation of the eStrat Process or by previous versions of Getting Results.
2. By providing users with Systems and associated characteristics, users are provided with a process that provides a comprehensive view of LEA systems, as well as the components of those systems that have a significant bearing on what is required for full and effective implementation of each system. The Needs Assessment: Analyze Systems component of the CP Process:
   a) Is unique in the arena of planning and the primary reason why CP is different from various strategic planning schemas.
   b) Compensates for the varying levels of competency found among the members of school and LEA planning teams.
   c) Provides for efficiencies in the use of time: traditional strategic planning processes ultimately identify key challenges, but only after appreciable time spent on analysis that—because of the limitations associated with the quality and availability of data and the capacity of planners to competently evaluate data—may or may not result in a comprehensive understanding of the complexity of the systems of systems that are LEAs.
   d) Efficaciously yields systemic challenges that can be evaluated and prioritized based upon the degree to which addressing those challenges will impact student performance, fiscal responsibility, and the safety of schools.
e) Provides an efficient linkage among the identification of systemic challenges, organizational goals, the identification of strategies that will attain those goals, and the creation of Action Plans that will implement the strategies.

3. The CP Process is constructed with the goal of requiring only the documentation specified by regulations. This does not eliminate the responsibility of educators to be prepared to justify their decisions to stakeholders—something, which is addressed in CP Process training—but it does reduce the amount of time previously required to generate and record justifications in planning web applications.

4. The CP web application is able to document, for historical and compliance purposes, the plans submitted by LEAs on established completion dates; however, the web application will remain dynamic, which means that entities will be able to respond to unanticipated and unplanned events that occur after plans have been approved and implemented. The relief provided here is relief from spending precious resources to develop a plan that is likely to become irrelevant as the internal and external environments of LEAs unexpectedly change over time.

Conclusion

By providing LEAs an excellent guided planning structure, it influences student achievement positively (Reeves 2009). With the development of the CP Process and its associated web application, an excellent planning format has been provided; therefore, LEAs can focus their efforts directly on the implementing the process. The training and support focus on the CP Process and its systemic analysis foundation has increased critical conversations and analysis generated by this guided planning structure. These conversations and analysis begin to push the process of planning from compliance to a reflective exercise.

Based on the preceding testimony, I recommend that the Chapter 4 revisions recognize the Comprehensive Planning process to be the state sanctioned process and data collection tool to satisfy the chapter planning requirements, the NCLB required planning and additional state and federal planning mandates.

I offered the aforementioned testimony based on the:
   1. recorded LEA needs of a CP process,
   2. complexity of regulatory requirements made simple by the CP process,
   3. unifying quality of the CP process with PDE initiatives,
   4. recorded and observed field experiences of LEAs and schools using the CP process and
   5. adaptability and relief offered by the CP process.

I welcome any opportunity to provide further testimony in front of the State Board of Education at your request.

Respectfully submitted,

Jason A. Conway
Statewide Project Director of Comprehensive Planning for PDE
55 Miller Street, Enola, PA 17025
717-732-8400 Ext. 8610—jconway@caiu.org
Resources

Best Practices in Strategic Planning, Organizational Development, and School Effectiveness—Howard M. Knoff

Framing Contests: Strategy Making Under Uncertainty—Sarah Kaplan


Public Service Improvement: Theories and Evidence
George A. Boyne and Tom Entwistle
http://books.google.com/books?hl=en&lr=&id=FPV4D7yNsrsC&oj=fnd&pg=PA60&dq=strategic+planning+impact+student+achievement+achievement+%22strategic+planning%22&ots=uGWai02f6f&sig=5WFyMYRH2_aQhyXEdigFdNaeMY#v=onepage&q&f=false

Three Models of Strategy—Ellen Earle Chaffee
http://www.jstor.org/action/showArticleImage?image=images%2Fpages%2Fdtc.91.tif.gif&suffi x=258215

The Rise and Fall of Strategic Planning and Strategic Planning in Education—Edward J. Miech
http://www.hepg.org/her/abstract/310