Colorado

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

COLORADO'S GUIDING PRINCIPLES

From a foundation of ambitious college- and career-ready expectations for all students, implemented through rigorous standards and assessments and expectations for teachers and building leaders, Colorado is poised to deliver an effective differentiated accountability, support and recognition system. The state's accountability system, already in its second year of full implementation, was designed to drive continuous improvements in student achievement and to account for individual student growth and proficiency in assessing school, district and state performance. With a successful ESEA flexibility application, the Colorado Department of Education (CDE) will be able to build upon current alignment efforts to create a single, rigorous, comprehensive accountability system that aligns state and federal determinations, interventions and resources, and differentiates support to the schools and districts in greatest need.

Colorado's accountability system creates focus by drawing a single bright line: all students need to be college- and career-ready by the time they leave Colorado's K-12 system. As a part of the Colorado Achievement Plan for Kids (CAP4K) and in conjunction with the Colorado Department of Higher Education and the public, CDE has defined college- and career- readiness as the knowledge, skills and behaviors essential for high school graduates to be prepared to enter college and the workforce and to compete in the global economy. In June 2009, the Colorado State Board of Education and the Colorado Commission on Higher Education developed a postsecondary and workforce readiness description. This description includes: (1) content knowledge in literacy, mathematics, science, social studies, and the arts and humanities, and (2) learning and behavior skills that include critical thinking and problem-solving; the ability to find and use information, especially through information technology; creativity and innovation; global and cultural awareness; civic responsibility; work ethic; personal responsibility; communication; and collaboration. For a complete description, please see Appendix 1 or follow this link: http://www.cde.state.co.us/cdegen/downloads/PWRdescription.pdf.

As shown in the appropriate sections of this document, Colorado is on a clear path towards aligning its standards and assessments with this bright line. Colorado's accountability system includes rigorous performance levels that hold all schools to college- and career-ready standards. The performance levels apply not only for the general population, but for historically disadvantaged subgroups as well. Colorado is proposing an accountability system that effectively melds achievement status, disaggregation, growth, and postsecondary readiness measures.

The results from a rigorous growth model such as Colorado's provide useful data that go well beyond what achievement status percentages can communicate – they give individual measures of student progress. Through intensive data analysis, CDE has concluded that a meaningful way to measure a school or district's effectiveness in preparing students for college- and career- readiness is by measuring students' growth to proficiency standard (link to data provided later). Absolute levels of student performance as measured by "achievement status" percentages tell a part of the story necessary for evaluating a school or district's effectiveness, but the other part of the story relies on a measurement of student academic growth. When solely status measures are considered, the system cannot be used to easily identify schools in which proficiency is currently meeting expectations, but where students are not learning enough to maintain that proficiency. Likewise, schools with low achievement can be identified as failures even when their students show remarkable growth that will most likely lead to proficiency at a later date. It is critical that an accountability system distinguish not just the schools and districts that are furthest from the bright line of college- and career- readiness for all students, but that the system also distinguishes among the schools and districts making the most progress in moving their students toward college- and career- readiness. Colorado's performance frameworks reflect these important distinctions among schools through use of the Colorado Growth Model and differentiated performance levels.

The Colorado Growth Model produces information about growth to standard, using both norm- and criterion-referenced data, allowing the state to measure how well schools and districts are moving students towards college- and career- readiness. First, the norm-referenced information provides a consistent context in which to understand performance because it describes how a student, a disaggregated student group, or a school or district is doing relative to others. Reporting of the median student growth percentiles distinguishes between an elementary school whose typical student is growing at the 10th percentile of his/her academic peers and an elementary school whose typical student is growing at the 80th percentile of his/her academic peers. This normative information is useful in its own right, but it is not enough. The criterion-referenced data from the Colorado Growth Model places normative progress in a meaningful context, quantifying what growth was needed for those students to, on average, be reaching or maintaining proficiency within a reasonable period of time. The model does this by matching the normative data with the state's achievement level cut scores, which have remained the same for a number of years. In this way, someone can understand both the normative level of growth (how much above or below average it might have been) as well as what outcomes that level of growth is likely to lead to.

Colorado places great value on growth to a standard, as it is a strong indicator of whether a school or district is effective in moving students towards college- and career- readiness. By including growth in the state's accountability system, Colorado can meaningfully distinguish between schools and districts that have high levels of student achievement but who are making limited growth, and schools and districts that have low levels of student achievement but who are making high growth. Although the state's accountability tools use both types of performance (achievement and growth, and normative and criterion-referenced growth), the emphasis is on growth to proficiency standard because it provides the most relevant information as to a school or a district's effectiveness, and consequently directs the state's support and interventions.

Finally, Colorado's system creates fairness by protecting all students. To close achievement gaps and increase equity, our state is concerned with improving educational outcomes not just for some students, or for the majority of students, but for all students. Compared to AYP accountability, almost 600,000 additional students are included in Colorado's accountability system. Colorado's accountability system not only maintains but advances a focus on equity. Along with reporting all available growth and achievement data at the specific NCLB disaggregated group level in SchoolView, the state's accountability measure includes a growth gaps indicator that disaggregates growth by minority status, poverty, disability, limited English proficiency, and by students scoring below proficient. This creates incentives for schools, districts and the state to look carefully at the growth that disaggregated groups of students are making relative to their academic peers, as well as if they are making the criterion-referenced growth they need to be college-and career-ready. Without higher growth rates, students that start out behind will never catch up. The additional disaggregation of the growth of students needing to catch up – those students below proficient on the prior year's assessment – further ensures that Colorado's accountability system highlights the growth of any students who are not on track to college- and career- readiness, regardless of their association with a specific student group. Graduation rate data is also disaggregated within the accountability framework.

OVERVIEW OF COLORADO'S SYSTEM OF ACCOUNTABILITY, SUPPORT AND RECOGNITION

In August 2010, Colorado launched its new, comprehensive system of accountability, support and recognition for schools and districts, designed to ensure that all students graduate from the Colorado K-12 school system college- and career-ready. Built upon the state's Education Accountability Act of 2009 (SB-163), the years of implementing NCLB accountability and support systems, an innovative and meaningful growth model, and a dynamic data reporting platform, this new system creates a performance management system focused on continuous improvement at all levels. Although only in its second year of full implementation, Colorado's accountability system has sparked meaningful conversations regarding school and district performance and sharpened the focus on improvement efforts.

Colorado's accountability system applies to all schools and districts (see Figure 2 below). Schools and districts are sorted based on their performance in the **School and District Performance Frameworks**. The differentiated performance types, represented in the second column, indicate which schools and

districts need the most attention and intervention. After receiving performance data, all schools and districts analyze and respond to the data through the **Unified Improvement Plan** process in order to determine the specific actions needed to raise student achievement. For those in the lowest levels of performance, Turnaround and Priority Improvement, an in-depth review of their plan is conducted and detailed feedback is provided. In alignment with the necessary action steps identified in their UIP, schools and districts can access supports from the state. A **tiered system of support** includes universal supports for all, as well as targeted and intensive supports and interventions for the lowest performing schools and districts. These supports are based on the identified needs in struggling schools and districts and the research on effective systems, designed to leverage the greatest gains in student learning.

Specific **consequences** apply to Priority Improvement and Turnaround schools and districts as well. Turnaround schools and districts must implement a Turnaround Option upon identification. Priority Improvement and Turnaround schools must offer choice and supplemental education services to families. To ensure that students are not attending persistently underperforming schools, no school or district may remain in Turnaround or Priority Improvement status for more than five consecutive years, per state legislation. Finally, all of the performance data, achievement data, staff information, and the UIPs themselves are reported through our dynamic, interactive **SchoolView** system, which provides transparent performance information.

Figure 2. Overview of Colorado's Single, Comprehensive Accountability System.

	SPF Plan Type	UIP	UIP Review	Supports		Consequences		Reporting
All schools in Colorado	Performance	All schools complete this process		Universal				Data for all schools is reported through SchoolView.org
	Improvement							
	Priority Improvement		CDE and State Review Plan provide feedback		Targeted and Intensive Supports: TIG and SIG		SES Choice Five Year Clock	
	Turnaround					Implement Turnaround Option		

Continuous improvement is necessary at all levels, including statewide, in order for this system to be

effective. CDE annually analyzes the results of the performance frameworks and looks for ways to improve upon them through the inclusion of other measures, better calculation methods, inclusion of more students, and meaningful disaggregation of the data wherever possible. SchoolView is regularly being enhanced and updated to further enable inquiry. The State continues to work to more explicitly define the legislation and consequences for identification, while building out the support provided to the schools and districts identified in greatest need. Through continuous reflection, CDE will annually strengthen the process of identifying performance challenges, planning for improvement, and implementing action steps with supports, enabling the state to increase student learning and student achievement throughout the state with the goal of college- and career- readiness for all.

Colorado believes our state system creates a more rigorous, comprehensive approach to accountability and support than previously existed within NCLB alone. As table below outlines, Colorado's single, comprehensive accountability system meets the requirements of and exceeds the expectations in NCLB Title IA accountability regulations. More students are included because accountability applies to all schools and not just Title I, a higher bar is set, and greater expectations for continuous improvement are expected of all schools. Additionally, support and interventions can now be directed towards all of the truly lowest performing schools.

Table 3. Comparison between NCLB Accountability and Colorado's Proposed System.

	NCLB	Colorado's, single, comprehensive accountability system
Purpose	• To ensure that all students attain basic proficiency in reading and math and meet graduation rate targets by a specific date.	• To ensure that every student graduates from K-12 education college- and career- ready.
Students Included for accountability	• 220,140 students (27% of all students) • 157,998 students in poverty (48% of students in poverty)	• 811,867 students • 327,932 students in poverty
Schools Included in Accountability Consequences	• 660 schools (35% of schools)	• 1899 schools
Measure of college- and	• Partially proficient, proficient,	• Proficient and advanced

career- readiness	and advanced • Reading, Math and Graduation Rates	• Growth to Standard (Adequate Growth) • Reading, Math, Writing, Science, English language proficiency, ACT, graduation and dropout rates
School and District Performance Indicators	• Participation	
	• Academic Achievement (AMOs)	
	• Partially Proficient and Above	• Proficient and Above
	• Measures of progress	
	• Safe Harbor	• Academic Growth to Standard (normative and criterion referenced growth), with AMOs
	• Matched Safe Harbor	• Academic Growth Gaps (Academic Growth to Standard by disaggregated group), with AMOs
	• (in Title III AMAOs, not AYP)	• Academic Growth in English Language Proficiency, with AMOs
	• Postsecondary Workforce Readiness- 4, 5, and 6 year graduation rates (with AMOs)	
		• 7-year graduation rates
		• Dropout rates
		• Composite ACT score
Disaggregation of	• 52,390 minority students	• 152,563 minority students

Achievement Results by Student Groups	included	included
	• All indicators	• Academic Growth Gap Indicator and Graduation Rate Indicator
	• English language learners, Students with Disabilities, Economically Disadvantaged students	
	• Race/ethnicity categories	• Minority (non-white)
		• Catch-up Students (growth for non-proficient students)
AMOs and Determinations	• Targets increase every three years.	• Targets/cut-points normed based on 2009-10 data; are reviewed annually and increased over time.
	• Targets step-up to 100% proficiency (Partially Proficient or higher) by 2014	• Growth targets are based on all students proficient (proficient and advanced) within three years or by 10th grade.
	• Yes or No for each disaggregated indicator	• Points (1-4) assigned for each sub-indicator
	• If there are any "No" determinations, then AYP is not met.	• Points are aggregated by indicator and overall
	• Schools and districts either make AYP or not.	• Schools are assigned 4 different plan types. Districts are given one of five accreditation levels.
	• Data are also reported by percent of targets met, by Reading, Math and Graduation Rate	
Improvement Planning	• Only Title I schools on	• All schools in the state,

Requirements	Improvement	regardless of performance
Supports available	• Only for Title I schools • missed many of the lowest performing schools • over-identified others	• All of the lowest performing schools
Public Reporting	• Limited requirements- achievement, HQ, etc.	• In addition, includes growth, growth to standard, dropout, equitable distribution of teachers, etc.

Before addressing the specific questions in the rest of the application, the next section provides an orientation to the Colorado Growth Model, the School and District Performance Frameworks and SchoolView as these are the key foundations for our waiver request.

THE COLORADO GROWTH MODEL

Absolute levels of student performance – "achievement status" percentages – provide a "snapshot" of current performance, but they do not provide an indication of where a school is headed. Because achievement only tells part of the story necessary for an evaluation of system effectiveness, a solid measurement of student academic progress across all levels of achievement is needed. Colorado has developed and implemented an innovative growth model designed to do this. This combination of growth calculations and an accompanying reporting system allows users to focus on the specific level of the system that is pertinent to their line of inquiry - from the individual student ("We know that this student is already proficient in Reading, but is he making further progress?") to a student group ("Are the American Indian students in this school making enough progress in Writing to be proficient by the time they move on to high school?") to the whole state ("Are the state's English Learners in metro areas making as much growth as those in rural areas?")

With multiple years of the State's data, the growth model accumulates a general understanding of the likelihood of patterns of performance. This translates into an ability to consider hypothetical scenarios, such as: *"A student scoring x, y and z in grades 3, 4 and 5 in reading would like to reach the level of Advanced by grade 8 in 2014. How much growth would she need to achieve for this to happen? Answer: nth percentile, sustained over each of the next three years."* These are not predictions per se; they are calculations that flow from positing one piece of the scenario and requesting model output for the other. In Colorado, this aspirational level of individual student growth is referred to as adequate growth percentiles (AGP), or growth to a proficiency criterion.

Aspirational growth related to particular criterion levels of performance is reported to Colorado schools and districts along with the rest of the growth information for each of their students. Districts have found the AGPs to be useful in helping to set individual goals for students, especially those far behind in terms of proficiency. Looking at this growth-to-a-standard measure serves as a reality check on how

much effort will be required to get a student to proficiency within three years or by exit. If exceptional levels of growth are required, then an exceptional intervention is called for. When this fact becomes widely understood by all stakeholders, an opportunity is created to marshal a consensus for change.

Colorado has pioneered this use of growth models and accordingly needed to investigate the validity of AGPs, to determine whether calculating them offers any advantage over not doing so. Using two cohorts of historical data for each content area, a simple prior proficiency achievement status model predicted that students already scoring at the proficient level in a given content area would continue to do so through the final year of the data, while those scoring below proficient would not attain proficiency within the timeframe. Those predictions were checked against what actually happened to get a sense of the accuracy of the base rate prediction – the percentage of the predicted outcomes that actually came true several years later. In an AGP-based prediction model, on the other hand, the prediction uses the statistical power of the Colorado Growth Model to look at score history and growth for each student in order to estimate whether or not a student is on track to catch up (starting out below proficient) or keep up (staying proficient). The AGP-based predictions were also compared against actual data (what really happened to those students) to arrive at a percentage of correct predictions. A summary of the correct predictions for each model is included in the Table 4, below.

Table 4. Correct Predictions of Proficiency Level using Prior Achievement versus Adequate Growth Calculations

		Percentage of correct predictions (prior proficiency level only)	Percentage of correct predictions (AGPs)	Improvement in percentage of correct predictions
Math	Below proficient	77.7	88.6	10.9
	Proficient	58.2	75.5	17.2
Reading	Below proficient	55.8	76.2	20.5
	Proficient	78.1	82.6	4.4
Writing	Below proficient	56.4	78.8	22.4
	Proficient	68.7	78.7	9.9

Using the simple prior proficiency model gives moderately good predictions in several cases. For example, predicting that a below-proficient student will remain below proficient in math is accurate 77.7 percent of the time. However, AGP-based predictions are better in all cases. The improvement in the percentage of correct predictions is impressive, and provides evidence of the validity and usefulness of the AGPs. Most importantly, the results suggest that the AGPs are most useful at discerning which

students are beating the odds and catching up, because the improvements in correct predictions are highest for the Below Proficient rows. This is directly attributable to the power of the Colorado Growth Model and its extension to AGPs. The percentages of correct predictions are unlikely to approach 100 even under the best of circumstances because of the large number of situations affecting a student's life and schooling in the years subsequent to the growth calculation made by the state. Indeed, these levels of prediction are quite remarkable by themselves, showing how useful the growth data can be.

These growth-to-standard calculations are essentially a hybrid statistic, with both growth and proficiency components represented. Schools with large numbers of students scoring below proficient have a difficult task facing them, because these students must grow more than already-proficient students – they need to catch up. In this way, schools that have large numbers of students needing to catch up face a stark reality that is quantified by the AGP calculations. No matter how high the observed *normative* growth in these schools, the amount of growth necessary for these students to achieve proficiency is calculated and reported, and that number can be high enough to represent a significant challenge. These AGPs are calculated at the individual level, but are aggregated in the same way as student growth percentiles, by the creation of a median that represents the central tendency. Median AGPs tell what level of growth was needed for all students, so that, on average, they would be reaching or maintaining proficiency within a reasonable timeframe.

Also fundamental to Colorado's approach is the recognition that in order to close persistent achievement gaps, observed growth needs to be significantly higher for historically disadvantaged groups. Achievement gaps are the end result of multiple years of lower growth for impacted students; therefore, growth will be a leading indicator of when gaps are closing. Colorado's accountability system looks specifically at the growth of disaggregated groups to assess whether or not it is sufficient to get these students to college- and career- readiness in time.

SCHOOL AND DISTRICT PERFORMANCE FRAMEWORKS

Overview

To focus attention on what matters most, the Education Accountability Act of 2009 (SB-163) requires the state to align conflicting accountability systems into a single system that holds all schools and districts accountable to a common framework. The state has acted upon this mandate by developing annual reports known as the School and District Performance Framework (SPF and DPF) reports (see Appendix 7 for an annotated report). The SPF and DPF reports provide a body of evidence on each school's and district's attainment on the four key performance indicators that most impact the system's ability to ensure college- and career- readiness for all students: Academic Achievement, Academic Growth to Standard, Academic Growth Gaps and Postsecondary and Workforce Readiness. The state defines measures and metrics for each of these performance indicators, and a school's or district's demonstrated outcomes are combined to arrive at an overall evaluation of a school's or district's performance. These evaluations are made annually, with the state providing both School and District Performance Framework reports to schools and districts at the start of each school year (by August 15) and publishing them on SchoolView for the public in the fall of each school year (by December).

For schools, the overall evaluation determines the type of improvement plan they must implement.

Schools are assigned one of four plan types: **Performance Plan, Improvement Plan, Priority Improvement Plan, or Turnaround Plan.**

For districts, the overall evaluation determines their accreditation designation. Districts are assigned to one of five accreditation designations: **Accredited with Distinction, Accredited, Accredited with Improvement Plan, Accredited with Priority Improvement Plan, or Accredited with Turnaround Plan.**

These determinations are the trigger for a differentiated system of recognition, accountability and support. The lowest-performers, those on a Priority Improvement or Turnaround Plan, have required interventions and receive the greatest attention from the SEA, including targeted state supports. Those on Distinction are rewarded, and the majority, those schools or districts on Performance or Improvement Plan, receive universal supports from the state.

Given this intent, Colorado set a baseline for the distribution of schools and districts in each category. In the first year of releasing the performance frameworks (August 2010), 65.9% of schools received a Performance plan assignment, 20.8% an Improvement plan, 8.3% a Priority Improvement plan, and 5.1% a Turnaround plan assignment. With a small proportion of schools and districts in the lowest two categories, the state is able to direct accountability and support efforts where they are most needed. This baseline also allows the state to benchmark its performance and to track progress from year to year in the shifts of the distribution. For the second year, the cut-points for each category remained the same as the prior year, but the numbers of schools and districts in Priority Improvement and Turnaround decreased slightly. These shifts are examined annually, and the State Board, in particular, is charged with annually reaffirming or adopting targets. When significant shifts in the system are observed, the bar for all schools and districts will be raised.

Performance Indicators

To arrive at an overall evaluation of a school or district's performance, the School and District Performance Frameworks individually evaluate a school or district's performance on each of the performance indicators of Academic Achievement, Academic Growth to Standard, Academic Growth Gaps and Postsecondary and Workforce Readiness. Each performance indicator evaluation is based on multiple state-defined measures and metrics. Based on performance relative to minimum state expectations (targets), schools/districts receive one of four ratings: *exceeds*, *meets*, *approaching* or *does not meet*. These are described below, with a summary in Table 5 and specific AMOs/performance targets/cut-points in Principle 2B and Appendix 4. For additional detail, see: http://www.cde.state.co.us/Accountability/PerformanceFrameworks.asp or http://www.cde.state.co.us/media/training/SPF_Online_Tutorial/player.html for an online tutorial.

TABLE 5. COLORADO'S SCHOOL PERFORMANCE FRAMEWORK REPORT				
PERFORMANCE INDICATOR	**ACHIEVEMENT**	**GROWTH**	**GROWTH GAPS**	**POSTSECONDARY AND WORKFORCE READINESS**
Points/Weight Elementary/Middle High School	 25 points 15 points	 50 points 35 points	 25 points 15 points	 - 35 points
Measure	**Colorado Student Assessment Program (CSAP), including:** • Lectura and Escritura (Spanish versions of reading & writing for grades 3, 4) • CSAP-A (alternate CSAP) **In the following content areas:** • Reading (25%) • Mathematics (25%) • Writing (25%) • Science (25%)	**Colorado Growth Model CSAP** • Reading (28.6%) • Mathematics (28.6%) • Writing (28.6%) **Colorado English Language Acquisition Proficiency Assessment (CELApro)** (14.3%)	**Colorado Growth Model CSAP** • Reading (33.3%) • Mathematics (33.3%) • Writing (33.3%)	**Graduation rate** (25%) **Disaggregated graduation rate** (25%) **Dropout rate** (25%) **Colorado ACT** (25%)
Metric	**% of students proficient/ advanced**	**Median Student Growth Percentile (MGP)** • Normative growth relative to academic peers **Adequate Student Growth Percentile (AGP)** • Criterion-referenced growth relative to standard (proficiency)	**For the following disaggregated student groups:** • Free/Reduced Lunch Eligible • Minority Students • Students w/Disabilities • English Learners • Students needing to catch up (below proficient in prior year) **Median Student Growth Percentile (MGP)** • Normative growth relative to academic peers **Adequate Student Growth Percentile (AGP)** • Criterion-referenced growth relative to standard (proficiency)	**Graduation rate** **Graduation rate disaggregated for the following student groups:** • Free/Reduced Lunch Eligible • Minority Students • Students w/Disabilities • English Learners **Dropout rate** **Colorado ACT composite score**

Academic Achievement

The Achievement indicator on the School and District Performance Framework reports reflect how a school/district's students are doing at meeting the state's proficiency goal: the percentage of students proficient or advanced on Colorado's standardized assessments. (Note that for AYP purposes, Colorado is approved to use partially proficient, proficient and advanced scores. The state system raises the bar to only include proficient and advanced). Academic Achievement indicators include results from CSAP (reading, math and writing given in grades 3-10; science given in grades 5, 8, 10), CSAPA (the alternate CSAP given to students with the most significant cognitive disabilities), and CSAP Lectura/Escritura (the Spanish versions of the reading and writing CSAP, for which English Language Learners in grades 3 and 4 may be eligible). This data, including disaggregations by race/ethnicity, disability, English proficiency, disability, poverty, migrant and gifted/talented status, grade, and gender, are all reported in SchoolView. Specific AMOs are provided in Principle 2B.

Academic Growth to Standard

The Academic Growth to Standard indicator measures academic progress using the Colorado Growth Model. This indicator reflects two aspects of growth: 1) median normative growth- how the academic progress of the students in a school/district compare to that of other students statewide with a similar CSAP score history in that subject area, and (2) adequate growth- whether this level of growth was sufficient for the typical student in a school/district to reach an achievement level of proficient or advanced on the CSAP within three years or by 10th grade, whichever comes first.

The framework sets minimum expectations for the Academic Growth to Standard indicator in reading, math and writing for each school level based on the interplay of median and adequate growth. (Because science is not assessed annually in each grade, annual growth percentiles are not available.) With this waiver process and continuing improvements to the frameworks, Colorado also plans to include median and adequate growth percentiles for the Colorado English Language Proficiency Assessment (CELApro) as an additional content area for the Academic Growth to Standard indicator.

The state recognizes that students start from varying achievement levels and that the most successful schools and districts make the greatest gains in moving a student from his/her starting point. However, growth to a standard is also imperative. The state's mission is to ensure that *all students* exit Colorado's K-12 system prepared for college- and career- success – not *all students except for those who start behind*. As a result, the Education Accountability Act requires that adequacy of growth is a factor in a school's or district's growth rating. The Growth indicator evaluates growth through the normative measure using median growth percentiles, but also through the criterion-referenced adequate growth percentiles. To be adequate, schools' or districts' MGPs must meet or exceed their median AGP. Specific performance targets on this indicator (AMOs) are provided in Principle 2B.

Academic Growth Gaps

The Academic Growth Gaps indicator measures the academic growth to standard of historically disadvantaged disaggregated student groups and students needing to catch up. It disaggregates the Growth Indicator into student subgroups, and reflects their median and adequate growth using the same criteria as Academic Growth to Standard. The subgroups include minority students, students eligible for Free/Reduced Lunch, English Learners, students with disabilities (IEP status), and students needing to catch up (students who scored Unsatisfactory or Partially Proficient in the prior year). Colorado added accountability for Academic Growth to Standard for students needing to catch-up, as these are the key students that the system, especially the Title I system, needs to focus upon.

The framework sets minimum expectations for the Growth Gaps indicator in the same way as in the Growth indicator. The framework evaluates where each subgroup's median growth percentile falls into the decision tree/scoring guide above and assigns points to each accordingly. By disaggregating for the median and adequate growth of historically disadvantaged student groups, the School and District Performance Frameworks hold schools/districts accountable for the growth of all students, not only growth relative to their academic peers and where they started, but also to the standard of proficiency and college- and career- readiness. Specific performance targets on this indicator (AMOs) are provided in Principle 2B.

Postsecondary and Workforce Readiness

The Postsecondary and Workforce Readiness Indicator measures the preparedness of students for college or careers upon exiting Colorado's K-12 school system. This indicator reflects student graduation rates, dropout rates, and Colorado ACT composite scores. In Colorado, all 11th grade students take the ACT assessment. Specific performance targets on this indicator (AMOs) are provided in Principle 2B.

Scoring: Arriving at an Overall Performance Indicator Rating, School Plan Type and Accreditation Designation

Based on the individual ratings of *does not meet*, *approaching*, *meets* and *exceeds* for each measure within each indicator, schools and districts receive an overall rating for each of the four key performance indicators of Academic Achievement, Academic Growth to Standard, Academic Growth Gaps and Postsecondary and Workforce Readiness. Details on these calculations are provided in the appendix.

The percent of points earned on all of the indicators are then combined to arrive at an overall school plan type or district accreditation designation. Each performance indicator is weighted differently; the percent of indicator points earned translate into a weighted percent of points earned. These weights, shown in Table 5, reflect Colorado's values. The Education Accountability Act requires that the state performance frameworks give the greatest weight to Academic Growth to Standard and Postsecondary and Workforce Readiness. Although all of the performance indicators provide evidence of a school/district's success in preparing students for college- and career- readiness, growth is the leading indicator of progress towards this and postsecondary and workforce measures most closely reflect actual preparedness.

Finally, the weighted percent of points earned sum up to an overall percent of framework points earned. Appendix 4 shows the cut-points needed to earn a final school plan type or district accreditation designation on the School and District Performance Framework reports.

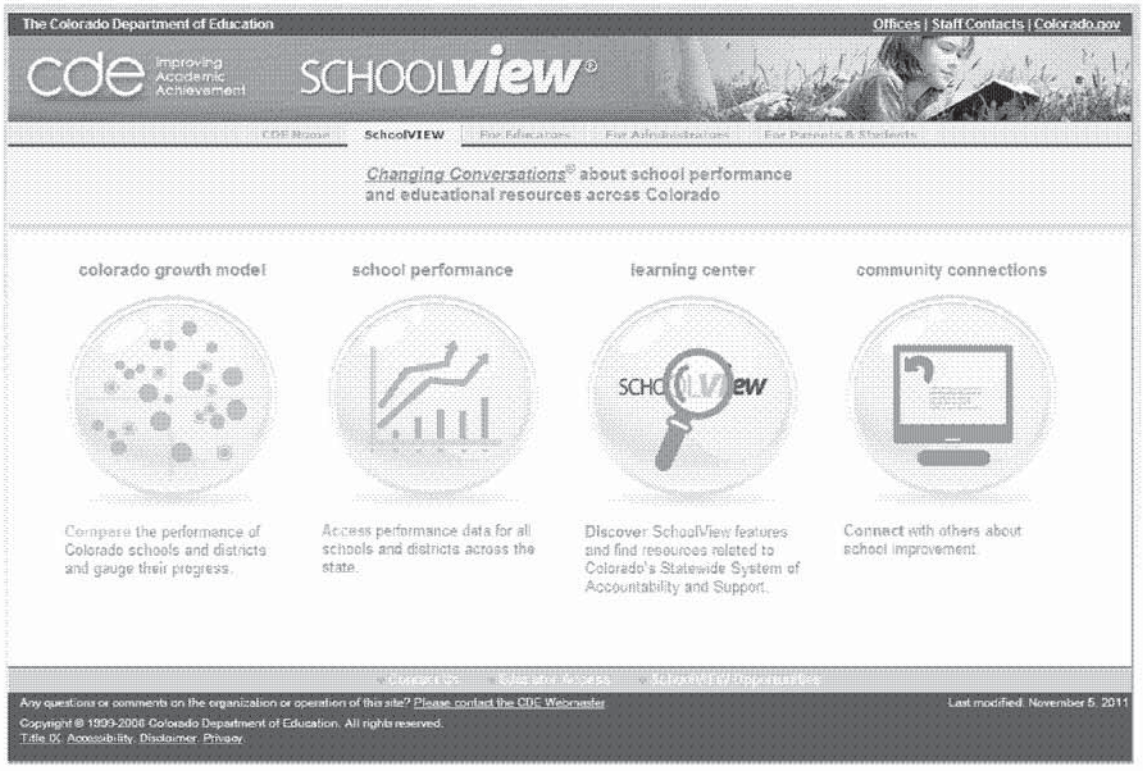
School and District Performance Framework Resources and Results

For more information on Colorado's School and District Performance Framework, including technical specifications, see the School Performance Framework Technical Guide www.schoolview.org/documents/SPFTechnicalGuide.pdf. For a guided online tutorial, see: www.cde.state.co.us/media/training/SPF_Online_Tutorial/player.html.

To access public School and District Performance Framework reports, go to: www.schoolview.org/performance.asp. Reports are available for 2009-10, with reports for 2010-11 to be publicly released in December 2011. Additionally, an annotated report is provided in Appendix 7.

PUBLIC REPORTING THROUGH SCHOOLVIEW

Colorado's approach to education data is to report all available data in a way that makes the information transparent, understandable, accessible, and, above all, useful. Usefulness is an important standard because improvement is the objective, not just exploration or understanding. In order to do this, Colorado created and registered a national trademark for a website (www.schoolview.org) where public users can access the most important education-related state data in a quick and easy fashion.

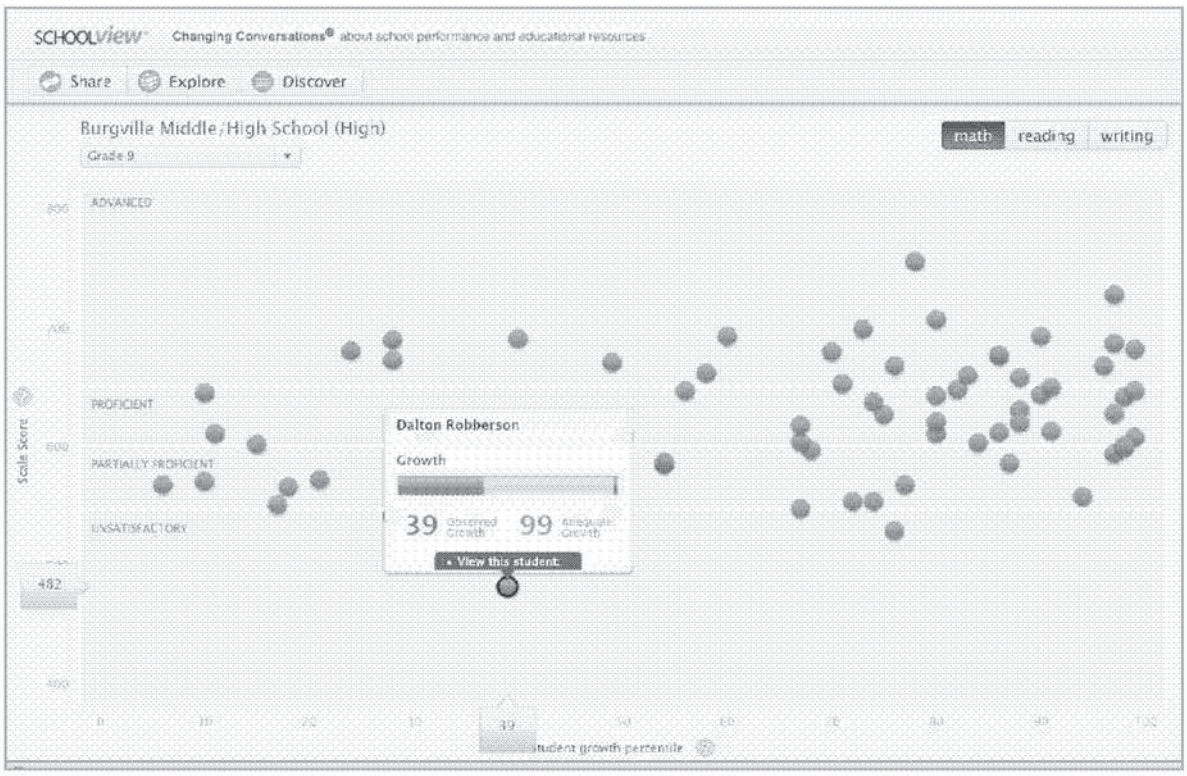


SchoolView houses the award-winning Colorado Growth Model application, as well as a suite of other tools that puts all the information at a user's fingertips (School Performance, Learning Center and Community Connections). Colorado has been at the forefront of the effort to use a growth model and a particular set of visual displays to generate understanding and interest around its student growth and achievement calculations. CDE provides both in-person and online professional development so that school and district educators can develop understanding of the data and their underlying meaning. Student growth as calculated by the state in its tested areas has not just been accepted by Colorado's schools and districts, but has been embraced and brought into many pertinent conversations and decisions. Frequent use of growth data by groups working in districts and schools has been documented by the state, demonstrating the numerous appropriate uses these groups have been able to put the data up against.

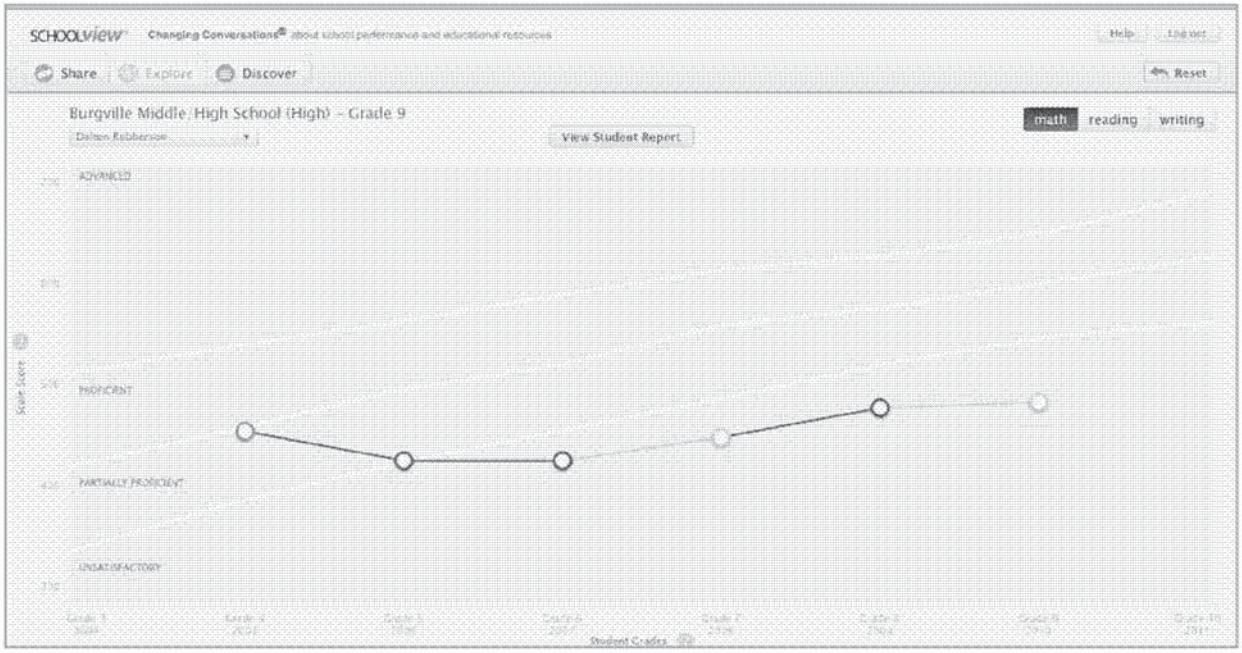
The Public Growth Model index allows users to select districts or schools of their choice and compare the results of their status and growth in reading, writing, and math over the last four years, in an easy-to-read visual.



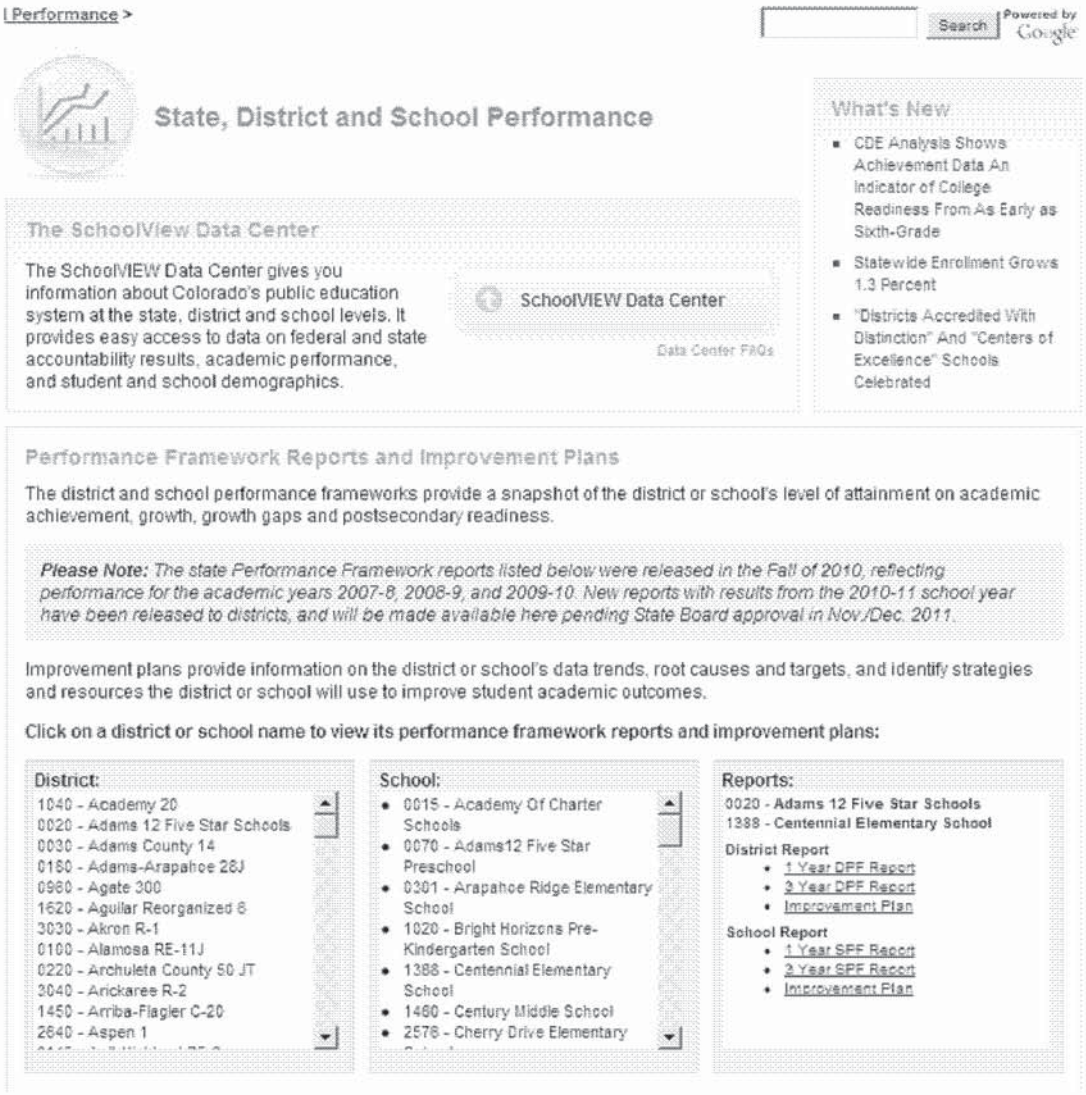
This public reporting is only a part of all that SchoolView makes available. Through the Student-Level Data Access in the Colorado Growth Model, school and district users with authenticated access to student-level data can get other insights into their data through a variety of private reports, like the one shared in the Overview. Through the Colorado Growth Model, a user can drill down into a school's public data to reveal the patterns of student growth and achievement, such as in this visual display of all 9th graders' math scores, with those of a particular student highlighted.



Another click would enable this user to drill down into the student's years of math data, so that the growth model comes alive with a longitudinal portrait of individual achievement and growth (pictured below). These displays and accompanying downloadable and printable pdf reports can become the center of a fruitful conversation about the different scenarios for a student's college- and career-readiness between the student him/herself, a parent and a teacher.



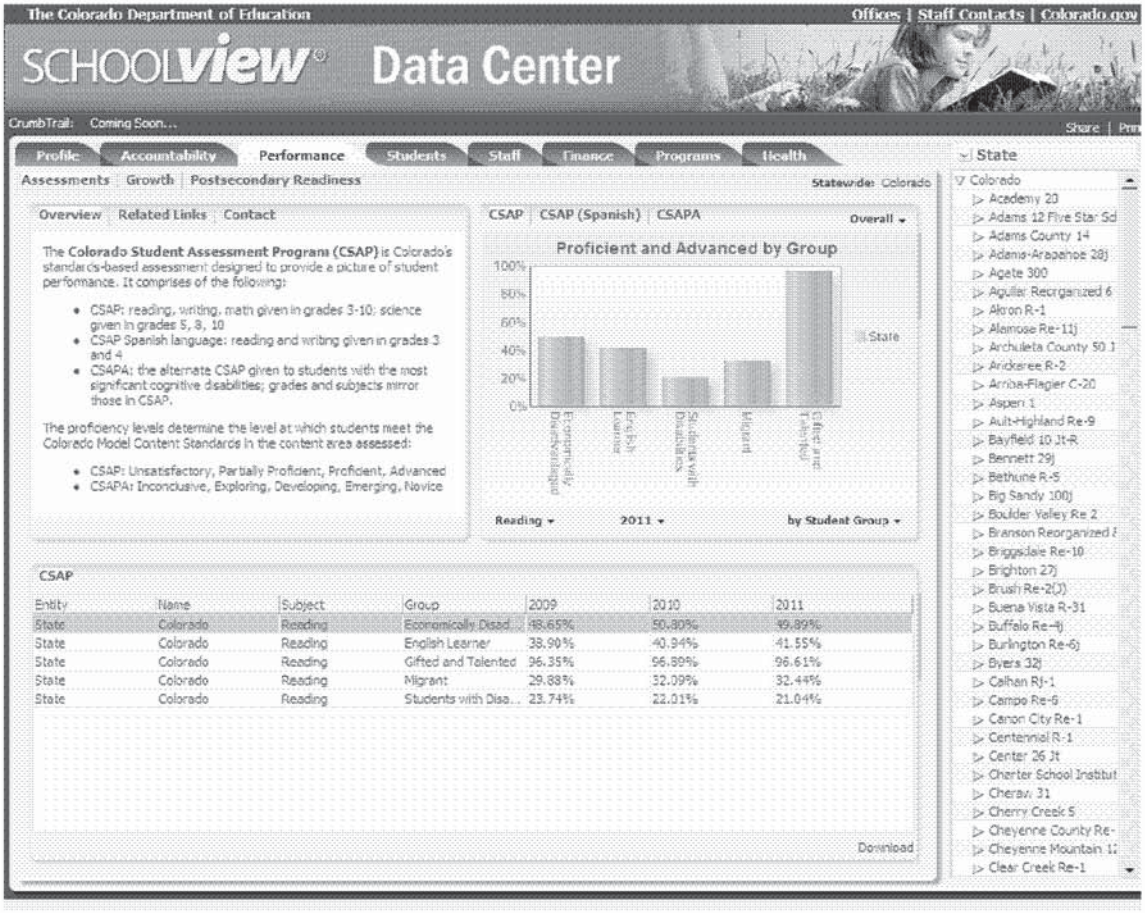
SchoolView is not only about growth data, however. Through a thoughtful and transparent presentation of all available education-related data in SchoolView, the state aims to engage stakeholders and facilitate a purposeful and effective use of those data at all levels of the system. In the School Performance section of SchoolView, users can access all school and district School and District Performance Frameworks, as well as the specific Unified Improvement Plan (at the bottom of the screen shot below).



Colorado includes the most important indicators in the Performance Frameworks. However, different stakeholders have different interests. All available data should be accessible to the public. In Colorado, stakeholders have access to the information they most value for accountability and they are able to analyze this data and cite public reports. This kind of online data reporting is an integral part of the system Colorado has constructed. All groups of stakeholders can see public data relevant to their areas of interest. In order for the public to make meaning of the data, it must be readily accessible and interpretable. With SchoolView, all data are publically available and can be disaggregated in myriad, user-specified ways, giving on-demand public data reporting with eight years of consistently comparable data.

As of 2010, in response to annual public reporting requirements in the Education Accountability Act, SchoolView also houses the SchoolView Data Center application, pictured below. The Data Center serves as the primary application through which the public can access information about Colorado's

public education system at the state, district and school levels. It provides easy access to data on federal and state accountability results, academic performance, and student and school demographics. The screen shot below shows the CSAP 2011 reading results for Economically Disadvantaged, English learners, students with disabilities, migrant and gifted and talented students. The trend data is listed in the table below.



Using the Data Center application, users can focus on a particular school or district and explore a variety of different kinds of data from the past three years. The platform allows users to navigate through tabs such as profile (school/district contact info), performance (assessment results), students (enrollment and safety), and staff (teacher quality and equity). Of particular importance to this waiver application is the accountability tab, where users can see a school's plan type or district accreditation rating, a school or district's improvement status on the federal system, or pull up a school or district's improvement plan. The fact that a school's achievement gaps or a district's accreditation rating are so easily obtainable by the media, parents and other stakeholders reflects Colorado's efforts to build transparency into the system. It also creates a strong incentive for school and district leaders to improve performance knowing that all results are publicly reported.

Through the transparency of the Performance Frameworks, Unified Improvement Plans and data accessible in SchoolView, Colorado has created a system where the performance of the state, districts and schools is the basis and focus for the education work in the state.

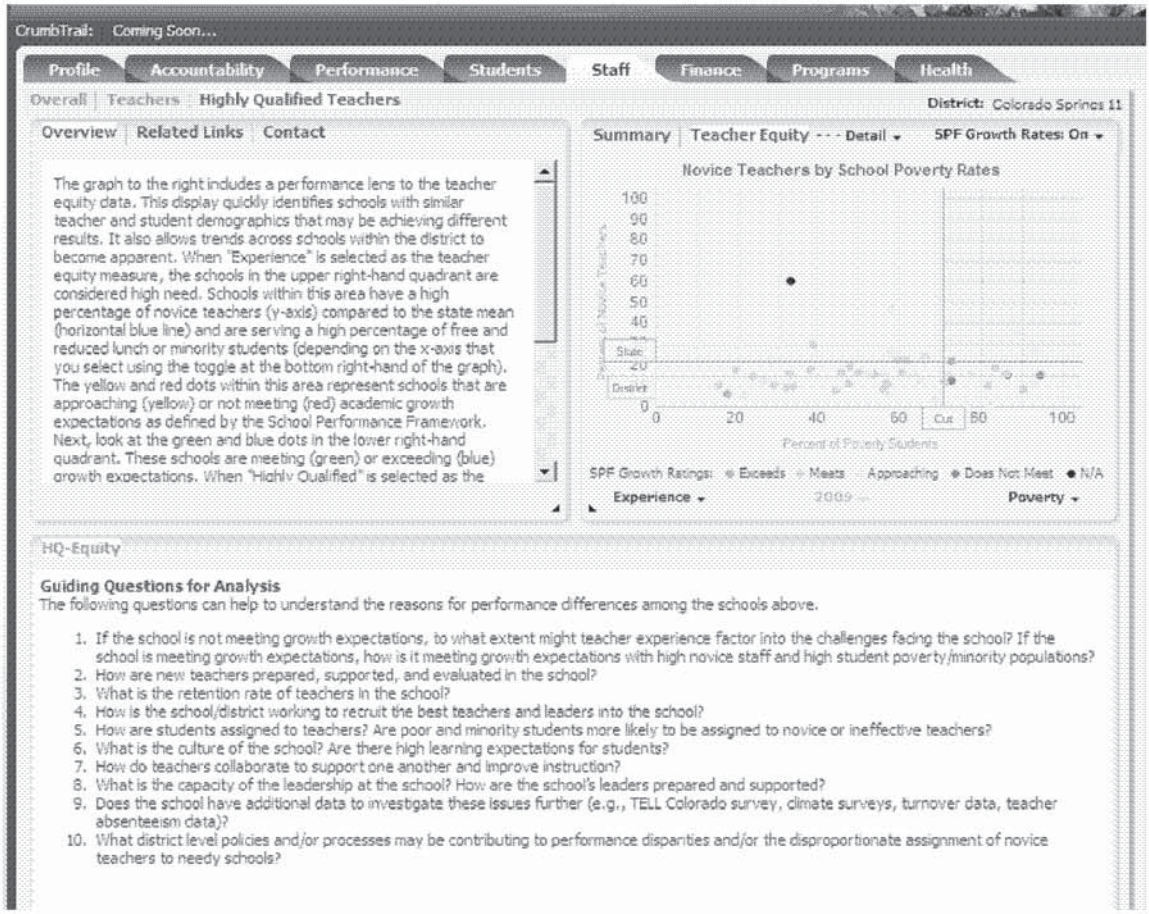
ADDITIONAL ACCOUNTABILITY INCLUDED IN THE DISTRICT PERFORMANCE FRAMEWORKS

TITLE IIA

Colorado has found the Title IIA accountability provisions under 2141(c) to be extremely helpful in assisting those districts with the greatest staffing needs to better leverage Title IIA funds. However, the 2141(c) identification process does not adequately identify the districts with the greatest needs, as we have outgrown the highly qualified and AYP targets. As of the 2010-11 school year, 99.06% of classes in Colorado were taught by highly qualified teachers. Increasingly, the state's focus on "educator effectiveness" is shifting from examining educator qualifications to focusing on educator evaluation as part of SB 10-191 (see Principle 3). Furthermore, AYP targets are extremely challenging and do not fully align with the state's system for identifying districts (as described by the performance frameworks above). Colorado proposes to keep the financial and planning requirements associated with 2141(c) in place, but to re-define how districts are identified under this provision. Specifically, the state would like to transition the measures to match the evolving accountability system. Accordingly, districts identified under 2141(c) will be those districts identified for Priority Improvement or Turnaround for three consecutive years under the state accountability system, regardless of highly qualified teacher data.

By changing how districts are identified for Title IIA accountability, Title IIA can align its work with state efforts. Colorado believes that if a district performs in the bottom 15%, it is highly probable that its human capital systems would benefit from a closer examination. The newly defined 2141(c) accountability would continue to give the state the leverage to work with those districts to identify human capital needs and align Title IIA resources accordingly. This negotiation will continue to be documented through the state's Unified Improvement Planning process.

Additionally, CDE would like to integrate the equitable distribution of teachers (EDT) requirements into the UIP process. Currently, all districts are required to conduct an EDT analysis and action plan, and provide an annual update to CDE. These plans will be folded into the Unified Improvement plan and process, thus reducing the reporting burden on districts (Principle 4). Colorado has investigated the best way to identify districts with Equitable Distribution gaps during the transition period to teacher effectiveness data. While highly qualified teacher data shows very little variability, CDE has detected equity gaps based on teacher experience. While experience alone does not determine a teacher's effectiveness, when teacher experience data is paired with a school's Academic Growth to Standard rating, the state has a better sense of how experience is impacting the school's achievement. Thus, CDE has identified districts with Equitable Distribution Gaps based on schools with high poverty/minority populations, high percentages of novice teachers and schools with the lowest Academic Growth to Standard ratings. Each district's EDT can be seen on the staff tab of SchoolView. Colorado Springs District 11's equitable distribution report from SchoolView is displayed below.



While CDE is not proposing to use the EDT directly in the identification of 2141(c) districts, the state will raise expectations for the use of that analysis in the improvement planning process and use of Title IIA funds. In other words, districts on Priority Improvement and Turnaround must include elements of their EDT analysis in their overall data analysis in the UIP. Based on their EDT analysis, CDE would expect specific action steps and use of Title IIA dollars to be reflected in the action plans. Through the district's UIP, a clear plan to address any relevant staffing and staffing distribution issues will be presented. CDE staff will carefully review the analysis and proposed plans and funding to ensure Title IIA funds are leveraged in the most effective manner.

TITLE IIIA- ACCOUNTABILITY FOR ENGLISH LEARNERS' IN COLORADO'S SINGLE, COMPREHENSIVE ACCOUNTABILITY SYSTEM

Colorado schools have more than 110,500 English Learners (13.28% of the state's K-12 population based on 2009-10 Student October data). In order to ensure that schools are able to prepare all students for college- and career- readiness, the state needs to ensure our English learners are gaining English proficiency, as well as academic content knowledge. It is not enough to measure this solely through separate Title III accountability measures. Thus, Colorado is adding measures of English language progress and attainment to the state performance frameworks for schools and districts.

Specifically, Colorado's Performance Frameworks include the following indicators focused on English learners:

1. Academic Growth to Standard on Colorado's English language proficiency assessment (CELApro).

   This includes the Growth Percentiles for all students with two consecutive CELApro overall scores. The Student Growth Percentile provides a number (1-99) of the relative growth the student made compared to other students with a similar language attainment history as measured by CELApro. The Median Growth Percentile (MGP) is calculated by finding the median of all the school/district's student growth percentiles. The median of the individual student growth percentiles provides a measure of the relative effectiveness of the school/district in teaching English to English language learners.

   Additionally, CDE calculates an Adequate Growth Percentile (AGP) for each student with a CELApro score. The CELApro calculates performance levels 1 through 5, where 1 is the lowest level of English proficiency and 5 is considered fully English proficient. The AGP is the growth percentile needed to get the student to English proficiency (level 5) within the set timeline. AGP is calculated as follows:

Current Proficiency Level	Desired Proficiency Level	Time Line to Reach Target
1	2	1 year
2	3	1 year
3	4	2 years
4	5	2 years

   For example, the aspirational growth goal for a student at Proficiency level 1 is to reach Proficiency Level 2 in one year. CDE calculates the student growth percentile needed to move that student's scale score in level 1 to the cut-point of level 2, based on the student's score history on the CELApro. The growth percentile needed is the student's AGP. AGP is calculated for all students within a school/district based on the goals in the table above.

Instead of a single proficiency level goal set for three years out, CELApro AGPs are based on interim proficiency levels. Due to technical aspects of the growth model and the fact that English language acquisition, based on the CELApro levels, is not linear, it made more sense to include interim AGP targets.

Finally a Median Adequate Growth Percentile is calculated for the school/district, following the same decision rules as for Academic Growth to Standard in Reading, Writing, and Math when assigning points for Academic Growth to Standard on CELApro.

2. The Academic Growth Gaps Indicator captures the Academic Growth to Standard ratings in Reading, Writing and Math for English Learners.

3. The Postsecondary Workforce Readiness Indicator includes Graduation Rate targets for English Learners.

CDE requests an additional waiver to redefine Annual Measurable Achievement Objectives (section 3122 of NCLB) to ensure a true single, comprehensive accountability system for Colorado. Specifically, AMAOs will be re-defined as follows:

- AMAO 1- progress in English language proficiency to be defined by the Median Growth Percentile on CELApro (1.a).
- AMAO 2- attaining English language proficiency to be defined by the Adequate Growth Percentile (1.b).
- AMAO 3 would be measured through the Academic Growth to Standard ratings in Reading, Writing and Math for English learners, as well as the Graduation Rate rating.

Districts with ratings of *does not meet* on the CELApro Academic Growth to Standard indicator would be considered to have not met AMAO 1 and 2. Districts with *does not meet* ratings for English learners in reading, writing and math Academic Growth to Standard indicators, and graduation rate indictors, would be considered to have not met AMAO 3.

By changing how AMAOs are defined for Title IIIA accountability, the program can align its work with State efforts. If data for English learners is embedded into a single accountability system, then the performance of English learners becomes a central focus, not the afterthought it often becomes when AMAOs are run separately. With over 13% of Colorado students learning English, it is imperative that the system includes performance indicators for English language proficiency and content proficiency for English language learners.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☒ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

2.A.ii. a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed;

In addition to reading and math, four other assessments contribute to Colorado's comprehensive performance frameworks. The percentage of students in the "all students" group that performed at the proficient level on the 2011 assessments (the most recent administration), are provided for all grades assessed, below (2.A.ii.a). Also included are the Median Growth Percentiles and Adequate Growth Percentiles, when applicable.

Writing

Results from the state writing assessments administered in grades 3-10 are included in three indicators in the performance frameworks. Writing constitutes 25% of the Academic Achievement indicator, 28.5% of the Academic Growth to Standard indicator and 33% of the Academic Growth Gaps indicator calculations. The state's alternate assessment (CSAPA) and the third and fourth grade Spanish version (Escritura) are used only in Academic Achievement, as the state does not calculate growth on the alternate assessment.

Table 6. Writing Performance

Grade	Percent Proficient or Advanced on CSAP Writing 2011	Percent Developing or Novice on CSAPA Writing 2011	Percent Proficient or Above on Escritura 2011	Median Growth Percentile 2011	Adequate Growth Percentile 2011
3	51.30%	27.91%	62.04%	NA	NA
4	55.73%	28.94%	28.80%	50	35
5	60.28%	39.68%	NA	50	38
6	61.91%	41.10%	NA	50	42
7	59.06%	38.29%	NA	50	47
8	54.26%	33.40%	NA	50	48
9	52.63%	30.11%	NA	50	45
10	46.89%	26.15%	NA	50	49

Science

Results from the science assessment results (CSAP and CSAPA), administered in grades 5, 8 and 10, are included in the Academic Achievement indicator calculation. Colorado does not calculate growth on science because it is not given in consecutive grades. Science data contributes to 25% of the Academic Achievement indicator.

Table 7. Science Performance

Grade	Percent Proficient or Advanced on CSAP Science 2011	Percent Developing or Novice on CSAPA Science 2011
5	46.69%	44.22%
8	49.43%	50.37%
10	47.46%	30.55%

As approved in Colorado's Accountability Workbook for Title I, proficiency is currently defined as Partially Proficient, Proficient and Advanced. The state has determined that in a comprehensive state accountability system focused on college- and career- readiness, it is important to only include proficient or advanced scores. Thus, the data presented above does not align with data submitted through EDFacts and the Consolidated State Performance Report.

CELApro

Results from the Colorado English Language Proficiency Assessment (CELApro) (administered in grades K-12 is included in the Academic Growth to Standard indicator calculation. CELApro Growth data contributes to 14% of the Academic Growth to Standard rating.

Table 8. CELApro Performance

Grade	Percent Level 1 2011	Percent Level 2 2011	Percent Level 3 2011	Percent Level 4 2011	Percent Level 5 2011
K	36.4%	45.5%	12.6%	5.4%	.2%
1	13.6%	16.2%	37.2%	30.2%	2.8%
2	5.8%	15.7%	27.4%	47.2%	3.9%
3	5.7%	13.1%	26.2%	45.8%	9.3%
4	4.3%	8.7%	27.2%	48.3%	11.5%
5	3.5%	5.3%	21.2%	52.4%	17.6%
6	3.4%	5.3%	25.4%	52.1%	13.7%
7	4.0%	4.4%	21.8%	53.0%	16.7%
8	4.2%	5.1%	18.1%	50.3%	22.4%
9	7.3%	9.1%	35.4%	41.2%	6.9%
10	8.2%	8.7%	29.2%	43.6%	10.3%
11	7.9%	10.0%	27.3%	43.7%	11.2%
12	9.1%	10.7%	26.4%	42.1%	11.8%

As CELApro is not used as a status measure, CDE uses the median growth percentile compared to the median adequate growth percentile for the Academic Growth to Standard rating. The table below displays, by grade, CELApro median growth percentiles and adequate growth percentiles. By nature of the growth model, the state median growth percentiles will be right about 50.

Table9. CELApro Growth

Grade	CELApro Median Growth Percentile 2011	CELApro Adequate Growth Percentile 2011
1	50	19
2	51	45
3	51	54
4	51	39
5	52	51
6	52	57
7	52	44
8	53	62
9	53	76
10	52	59
11	52	60
12	51	76

ACT

The Postsecondary and Workforce Readiness indicator includes Colorado ACT composite scores. ACT results contribute to 33% of the Postsecondary Workforce Readiness indicator.

Table 10. ACT Scores.

Grade	Colorado ACT Composite Score 2011
11	19.452

All of the indicators included in the Performance Indicators are directly related to college- and career-readiness. Reading, writing, math and science proficiency assessments all measure the content needed for success in college- and career- and are weighted in an equal manner. English language proficiency is directly related to a student's success in the U.S. postsecondary system or workforce, but does not apply to all students, and thus is weighted half of the weight of content assessments. Finally, ACT scores are a third of the Postsecondary Workforce Readiness indicator, as they directly measure students' college readiness.

2.A.ii. b include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

As writing, math, English language proficiency and ACT results are key skills needed for students to be college- and career- ready, their inclusion in the accountability system strengthens the State's ability to determine the effectiveness of schools and districts at preparing students.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

2.B.i. Provide the new AMOs and an explanation of the method used to set these AMOs.

Setting Ambitious but Attainable AMOs

The effectiveness of Colorado's recognition, accountability and support system depends in large part on AMOs that are both ambitious and attainable. The AMOs must be ambitious to ensure that the system reflects our highest aspirations for getting all students college- and career-ready, yet they must also be attainable so that schools and districts find them to be meaningful and useful goals that guide improvement efforts. Colorado carefully creates the right tension by blending what we aspire to – the end goal of all students college- and career-ready – with what we see as evidence of significant progress toward this goal: consistent increases in achievement and postsecondary and workforce readiness outcomes, resulting from steady growth and growth to standard. Such a balance provides Colorado schools and districts with a comprehensive view of their performance, and enables them to use the accountability determinations made by the state for improvement.

To set AMOs, Colorado focuses first on the performance and needs of individual students. The state reports a variety of school- and district-level data based on their students' performance levels on the state assessment, including traditional proficiency rates: the percent of students proficient or advanced in each content area. However, we also use the Colorado Growth Model to dig deeper into what each student's prior and current performance means. We report on normative growth using individual student growth percentiles, which measure the amount of growth a student has made relative to his/her academic peers; this helps determine if a student has made high, typical, or low growth. We also report on criterion-referenced growth using adequate student growth percentiles, which measure the amount of growth a student would have needed to catch up to or keep up with proficiency; this helps determine if a student is making enough growth to be on track to college and career readiness.

The latter growth to standard measure allows the state to annually set individual student AMOs, then to make annual yes/no determinations of whether or not each individual student is on track to college and career readiness. In turn, we can also understand the actual amount of growth that a student needed to be on track and what varying levels of growth would mean for a student's future performance levels. Thus, Colorado's standard is higher than that set by AYP; just getting to proficiency (or, as approved by USDE, partial proficiency) is not sufficient because a student must also maintain that level of performance to remain on track for college and career readiness. Our accountability system encourages educators to shift their focus from "bubble kids" onto all students. Teachers, school and district leaders, parents and students receive individual student growth reports that chart this path to proficiency, compelling attention and action at the individual level.

Based on these student-level results and AMOs, Colorado aggregates the results at the school, district

and state level. These results are compared against state-created cut-points within a calibrated, multi-measure performance framework for every school and district. The specific AMOs, and the methodology for setting them, are described by Colorado's key performance indicators in the section that follows. They are also summarized in Table 11, below.

TABLE 11. COLORADO'S SCHOOL PERFORMANCE FRAMEWORK REPORT				
PERFORMANCE INDICATOR	**ACHIEVEMENT**	**GROWTH**	**GROWTH GAPS**	**POSTSECONDARY AND WORKFORCE READINESS**
Points/Weight Elementary/Middle High School	 25 points 15 points	 50 points 35 points	 25 points 15 points	 - 35 points
Measure	**Colorado Student Assessment Program (CSAP), including:** • Lectura and Escritura (Spanish versions of reading & writing for grades 3, 4) • CSAP-A (alternate CSAP) **In the following content areas:** • Reading (25%) • Mathematics (25%) • Writing (25%) • Science (25%)	**Colorado Growth Model CSAP** • Reading (28.6%) • Mathematics (28.6%) • Writing (28.6%) **Colorado English Language Acquisition Proficiency Assessment (CELApro)** (14.3%)	**Colorado Growth Model CSAP** • Reading (33.3%) • Mathematics (33.3%) • Writing (33.3%)	**Graduation rate** (25%) **Disaggregated graduation rate** (25%) **Dropout rate** (25%) **Colorado ACT** (25%)
Metric	**% of students proficient/**	**Median Student Growth**	**For the following**	**Graduation rate**

	advanced	**Percentile (MGP)** • Normative growth relative to academic peers **Adequate Student Growth Percentile (AGP)** • Criterion-referenced growth relative to standard (proficiency)	**disaggregated student groups:** • Free/Reduced Lunch Eligible • Minority Students • Students w/Disabilities • English Learners • Students needing to catch up (below proficient in prior year) **Median Student Growth Percentile (MGP)** • Normative growth relative to academic peers **Adequate Student Growth Percentile (AGP)** • Criterion-referenced growth relative to standard (proficiency)	**Graduation rate disaggregated for the following student groups:** • Free/Reduced Lunch Eligible • Minority Students • Students w/Disabilities • English Learners **Dropout rate** **Colorado ACT composite score**
Performance	See below for targets for	See below for targets for	See below for targets for	See below for targets

Target(s)	*exceeds, meets, approaching*				*exceeds, meets, approaching*	*exceeds, meets, approaching*	*exceeds, meets, approaching*
Exceeds	90th percentile of schools*				If the school's growth was adequate to reach or maintain proficiency (MGP > AGP): 60	If the subgroup's growth was adequate to reach or maintain proficiency (MGP > AGP): 60	**Graduation rate** (overall and disaggregated) 90% **Dropout rate** At/below 1% **Colorado ACT composite score** At/above 22
		Elem	Middle	High	If the school's growth was not adequate to reach or maintain proficiency (MGP < AGP): 70	If the subgroup's growth was not adequate to reach or maintain proficiency (MGP < AGP):70	
	R	89.1%	88.2%	87.2%			
	M	89.3%	75.0%	54.8%			
	W	76.8%	79.7%	72.2%			
	S	76.0%	75.1%	72.4%			
Meets	50th percentile of schools* (using baseline from Year 1 of the SPF in 2009-10)				If the school's growth was adequate to reach or maintain proficiency (MGP > AGP): 45	If the subgroup's growth was adequate to reach or maintain proficiency (MGP > AGP): 45	**Graduation rate** (overall and disaggregated) 80% **Dropout rate** At/below state average* (3.6%) **Colorado ACT composite score** At/above state average* (20)
		Elem	**Middle**	**High**	If the school's growth was not adequate to reach or maintain proficiency (MGP < AGP): 55	If the subgroup's growth was not adequate to reach or maintain proficiency (MGP < AGP): 55	
	R	71.6%	71.4%	73.3%			
	M	70.9%	52.5%	33.5%			
	W	53.5%	57.8%	50.0%			
	S	47.5%	48.0%	50.0%			
Approaching	15th percentile of schools (using baseline from Year 1 of the SPF in 2009-10)				If the school's growth was adequate to reach or maintain proficiency (MGP > AGP): 30	If the subgroup's growth was adequate to reach or maintain proficiency (MGP > AGP):30 If the subgroup's growth was	**Graduation rate** (overall and disaggregated) 65%

		Elem	**Middle**	**High**	If the school's growth was not adequate to reach or maintain proficiency (MGP < AGP):40	not adequate to reach or maintain proficiency (MGP < AGP): 40	**Dropout rate** At/below 10% **Colorado ACT composite score** At/above 17
	R	49.2%	50.4%	54.9%			
	M	48.6%	29.7%	16.0%			
	W	32.5%	35.0%	31.0%			
	S	19.7%	23.8%	27.5%			

* Percentiles and averages are based on Year 1 of the School Performance Framework reports using 2009-10 baselines.

Annual Measurable Objectives

Academic Achievement

The Academic Achievement indicator accounts for 10 out of 100 possible points on a high school/district's performance framework report, and 25 points out of 100 possible points on an elementary/middle school's performance framework report. It is based on the percent of students scoring proficient or advanced on the state assessment (CSAP or an alternative) in the four content areas of reading, math, writing and science. Each content area receives equal weight (25%). Schools/districts can receive up to four points: (1) *does not meet* state expectations, (2) *approaching* state expectations, (3) *meets* state expectations, and (4) *exceeds* state expectations.

The cut-points for each of these ratings define the AMOs for achievement. The cut-points are based on what each school/district's percent of students proficient or advanced translates to as a percentile relative to other school/district's percent of students proficient or advanced statewide. They were baselined using results from the first year of the state's performance frameworks in 2009-10.

A school/district *does not meet* state expectations if its percent of students proficient or advanced falls **below the 15th percentile** of proficiency in a given content area at a given school level (based on 2009-10 baselines). A school/district is *approaching* state expectations if its percent of students proficient or advanced is **at or above the 15th percentile**. A school/district *meets* state expectations if its percent of students proficient or advanced is **at or above the 50th percentile**. A school/district *exceeds* state expectations if its percent of students proficient or advanced is **at or above the 90th percentile**.

The proficiency rates associated with the 15th/50th/90th percentile for each content area at each school level are listed in Table 12 below. They are also reported on the back page of each SPF and DPF report.

Table 12. Academic Achievement AMOs.

Academic Achievement AMOs for Schools: Percent of students proficient or advanced by percentile cut-points – 2009-10 baseline (1-Year SPF)

	Reading			Math			Writing			Science		
	Elem	Middle	High	Elem	Middle	High	Elem	Middle	High	Elem	Middle	High
N of Schools	1008	479	327	1007	480	327	1007	480	327	912	407	286
Approaching: 15th percentile	49.2	50.4	54.9	48.6	29.7	16	32.5	35	31	19.7	23.8	27.5
Meets: 50th percentile	71.6	71.4	73.3	70.9	52.5	33.5	53.5	57.8	50	47.5	48	50
Exceeds: 90th percentile	89.1	88.2	87.2	89.3	75	54.8	76.8	79.7	72.2	76	75.1	72.4

Academic Achievement AMOs for Schools: Percent of students proficient or advanced by percentile cut-points – 2008-10 baseline (3-Year SPF)

	Reading			Math			Writing			Science		
	Elem	Middle	High	Elem	Middle	High	Elem	Middle	High	Elem	Middle	High
N of Schools	1032	507	362	1032	507	361	1032	507	362	972	469	347
Approaching: 15th percentile	50	50.6	53.3	48.7	29.7	13.5	32.6	36.8	30	20.5	25	27.9
Meets: 50th percentile	72	71.4	72.2	70.1	51.6	30.5	54.8	58.3	49.6	45.4	48.7	50
Exceeds: 90th percentile	88.2	87.4	86.2	87.5	74.4	52.2	76.5	79.2	71	72.6	71.3	71.5

Setting the AMOs using a real baseline enables schools, districts and the state to gauge progress from year to year. Through a rating system, improvements are measured by the change in the number of schools/districts that receive each of the ratings, from *does not meet* to *approaching* to *meets* to *exceeds*. The *exceeds* cut-point incentivizes those schools/districts that are already meeting state expectations to push performance even higher. At the same time, using normative baselines allows the states to target support to those below the 15th percentile. This 2009-10 baseline, however, will not always define the AMOs. The AMOs are annually reviewed by CDE and reset or affirmed by the State Board of Education. As CDE sees improvements in the system and integrates a new assessment, we will update AMOs to raise the bar to drive continuous improvement.

In the areas where proficiency rates and AMOs are not used for accountability purposes within the performance frameworks, Colorado still reports them on the SchoolView Data Center. The Data Center reports, for each school, district and the state, the percent of students proficient or advanced, as well as the percent of students in each performance level (unsatisfactory, partially proficient, proficient, and advanced). Users can disaggregate the data by grade, race/ethnicity (American Indian/Alaskan Native, Asian, Black, Hispanic, White), gender and student group (Gifted and Talented, Students with Disabilities, Migrant, Economically Disadvantaged, English Learners). CDE intends to add the proficiency cut-points needed to receive a *meets* or *exceeds* on the SPF/DPF as a line to show the AMOs for schools and districts.

Academic Growth to Standard

The Academic Growth indicator accounts for 35 out of 100 possible points on a high school/district's performance framework report, and 50 out of 100 possible points on an elementary/middle school's performance framework report. It is currently based on the median student growth percentile and the median adequate student growth percentile on the state assessment (CSAP) in the content areas of reading, math and writing (science is not annually assessed so growth data are unavailable). Each receives equal weight (33.3%). For future versions of the performance framework, Colorado, upon stakeholder consultation, intends to add the median student growth percentile and the median adequate student growth percentile on the Colorado English Language Acquisition Proficiency Assessment (CELApro). With this addition, each of the content areas would receive equal weight to each

other (28.6%), and CELApro would receive half of the weight of each content area (14.3%). Schools/districts can receive up to four points: (1) *does not meet* state expectations, (2) *approaching* state expectations, (3) *meets* state expectations, and (4) *exceeds* state expectations.

The cut-points for each of these ratings define the AMOs for growth. In Colorado, as previously described in Principle 2B, growth comprises of two aspects: 1) normative growth, as defined by median student growth percentiles- how the academic progress of the students in a school/district compare to that of other students statewide with a similar CSAP score history in that content area, and (2) adequate growth, as defined by adequate student growth percentiles- whether this level of growth was sufficient for the typical student in a school/district to reach an achievement level of proficient or advanced on the CSAP within three years or by 10th grade, whichever comes first. The state uses adequate growth as a context in which to place an observed normative growth statistic. Growth can be above normatively average, but when it is far from adequate, it has less value. Conversely, growth can be adequate even at a very low level when most students are already scoring well above the proficiency cut score.

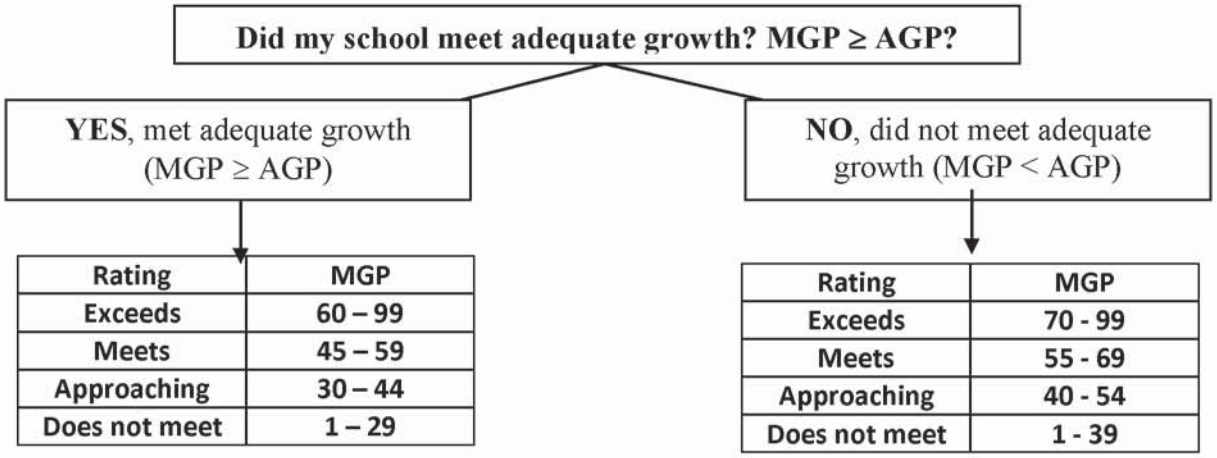
In one case, a school's normative growth (the median growth percentile) may exceed the adequate growth (the median adequate growth percentile) and the school could still receive a *does not meet* rating on the Growth indicator. Colorado still requires a certain level of normative growth because we want to push high-performing schools to continue growing. Even though the school's typical student may be proficient, it is important that he/she make solid normative growth relative to his/her academic peers. A median growth percentile of 1 would suggest that he/she is making significantly less growth than his/her peers. On the other hand, a school's normative growth (the median growth percentile) may be less than the adequate growth (the median adequate student growth percentile) and the school could still receive an *exceeds* rating on the Growth indicator. Even though the school's typical student may not be proficient, relying solely on the adequate growth would become purely a status measure, and strong normative growth is an important indication of the school's effectiveness. In a school where the median growth percentile – of high- and low-performing students – is 95, for example, the school is growing students at an accelerated pace, but they likely have more students who start further behind. This does not mean that Colorado considers such a school to be a top-performing school; the school still needs to demonstrate that it meets state expectations in achievement or postsecondary and workforce readiness measures, and if those are below state expectations it is likely to end up on an Improvement or Priority Improvement Plan. However, this also does not mean that Colorado automatically considers such a school to be one of its lowest performers, who show both low achievement and low growth outcomes.

The growth rating system described below reflects the balance Colorado strives for in its accountability system. It was agreed upon by Colorado stakeholders because they thought it created the right tension in the system: rewarding growth, but tempering it with a view of what that level of growth would likely lead to in terms of college and career readiness for students.

The cut-points are based on the median student growth percentile, but they are bifurcated based upon the adequate student growth percentile, according to Figure 3, below. If a school/district makes

adequate growth because its median growth percentile (MGP) is at or above its median adequate growth percentile (left columns), then a **MGP of 30 or above** means the school/district is *approaching* state expectations; **a MGP of 45 or above** *meets* expectations and a **MGP of 60** or above *exceeds* expectations. However, if a school/district does not make adequate growth because its MGP is below its median AGP (right columns), then higher growth is required to earn each rating. A **MGP of 40 or above** means the school/district is *approaching* state expectations; a **MGP of 55** or above *meets* expectations and an **MGP of 70** or above *exceeds* expectations.

Figure 3. Academic Growth to Standard AMOs.



Rating	MGP
Exceeds	60 – 99
Meets	45 – 59
Approaching	30 – 44
Does not meet	1 – 29

Rating	MGP
Exceeds	70 - 99
Meets	55 - 69
Approaching	40 - 54
Does not meet	1 - 39

This bifurcation of the MGPs depending on the AGPs helps Colorado attain the balance between ambitious and attainable. For schools where the average student is already proficient, schools are still expected to demonstrate growth; though they may not need as much growth, a median growth percentile of 38 would only be *approaching* state expectations and close to a year's growth (45, where 50th percentile is typically a year's growth in a year's time) would be required to *meet* state expectations. On the other hand, for schools where the average student is not already proficient, schools are expected to demonstrate even higher levels of growth; though they may be making typical growth, a median growth percentile of 53 would only be *approaching* state expectations and more than a year's growth (55, where 50th percentile is typically a year's growth in a year's time) would be required to *meet* state expectations. Statewide, while the median growth percentiles will not change greatly, norming to the 50th percentile, the median adequate growth percentiles should change as performance and effectiveness improves and more students are on track to college and career readiness.

Academic Growth Gaps

The Academic Growth Gaps indicator accounts for 15 out of 100 possible points on a high school/district's performance framework report, and 25 out of 100 possible points on an elementary/middle school's performance framework report. It is based on the median student growth percentile and the median adequate student growth percentile of disaggregated student groups on the state assessment (CSAP) in the content areas of reading, math and writing (science is not annually

assessed so growth data is unavailable). The disaggregated student groups include historically disadvantaged student groups – economically disadvantaged students, minority students, students with disabilities, and English learners – and students needing to catch up (those below proficient on the prior year's assessment). Each of the CSAP content areas receives equal weight (33.3%). Schools/districts can receive up to four points: (1) *does not meet* state expectations, (2) *approaching* state expectations, (3) *meets* state expectations, and (4) *exceeds* state expectations.

The cut-points for each of these ratings define the AMOs for growth gaps. As with the Growth indicator, the cut-points for the Growth Gaps indicator are based on the median student growth percentile, but they are bifurcated based upon the adequate student growth percentile, according to Figure 3 above. If a disaggregated student group makes adequate growth because its median growth percentile (MGP) is at or above its median adequate growth percentile (left columns), then a **MGP of 30 or above** means the subgroup is *approaching* state expectations; a **MGP of 45 or above** *meets* expectations and a **MGP of 60** or above *exceeds* expectations. However, if a disaggregated student group does not make adequate growth because its MGP is below its median AGP (right columns), then higher growth is required to earn each rating. A **MGP of 40** or above means the subgroup is *approaching* state expectations; a **MGP of 55 or above** *meets* expectations and an **MGP of 70 or above** *exceeds* expectations.

In the same way as in the Growth indicator, this bifurcation of the MGPs depending on the AGPs keeps Colorado expectations high for all subgroups. For subgroups where the typical student is already proficient, schools are still expected to demonstrate growth with the subgroups; though they may not need as much growth, a median growth percentile of 38 would only be *approaching* state expectations and close to a year's growth would be required to *meet* state expectations. On the other hand, for subgroups where the typical student is not already proficient, schools are expected to demonstrate even higher levels of growth with the subgroups; though they may be making typical growth, a median growth percentile of 53 would only be *approaching* state expectations and more than a year's growth would be required to *meet* state expectations.

In the areas where growth and growth to standard AMOs are not used for accountability purposes within the performance frameworks, Colorado still reports them on the SchoolView Colorado Growth Model application. The Colorado Growth Model application reports, for each school and district, the median student growth percentile (observed growth) and the median adequate student growth percentile (adequate growth). Users can disaggregate the data by grade, race/ethnicity (American Indian/Alaskan Native, Asian, Black, Hawaiian/Pacific Islander, Hispanic, Two or More Races, White), gender and student group (gifted and talented students, students with disabilities, migrant students, economically disadvantaged students, English learners, homeless students). For each of these disaggregations, the growth charts clearly show if a subgroup has made adequate growth. School and district leaders can also see this at the individual student level using the private-access views of the Colorado Growth Model.

Postsecondary and Workforce Readiness

The Postsecondary and Workforce Readiness indicator accounts for 35 out of 100 possible points on a high school/district's performance framework report (strong state measures for elementary/middle schools are not currently available). It is currently based on graduation rates, dropout rates, and Colorado ACT scores. Each rate/score receives equal weight (33.3%). For future versions of the performance framework, Colorado, upon stakeholder consultation, intends to add disaggregated graduation rates. With this addition, each rate/score would receive equal weight (25%). Schools/districts can receive up to four points: (1) *does not meet* state expectations, (2) *approaching* state expectations, (3) *meets* state expectations, and (4) *exceeds* state expectations.

The cut-points for each of these ratings define the AMOs for postsecondary and workforce readiness. The cut-points are based on a standard or on state averages. Averages were baselined using results from the first year of the state's performance frameworks in 2009-10 or 2008-09 (given the delay in data reporting for graduation and dropout rates).

For the graduation and disaggregated graduation measures, the framework sets minimum expectations against a standard. A school/district *does not meet* state expectations if its graduation rate is **below 65%,** is *approaching* expectations if its graduation rate is **at or above 65%,** *meets* expectations if its graduation rate is **at or above 80%** and *exceeds* expectations if its graduation rate is **at or above 90%**. For the disaggregated graduation rate, these same expectations will be set for economically disadvantaged students, minority students, students with disabilities and English learners. The 80% minimum is based on guidelines from USDE, while the 65% is slightly higher than the 60% USDE uses for School Improvement Grant eligibility.

For the dropout measure, the framework sets minimum expectations against a combination of standards and normative data. A school or district *does not meet* state expectations if its dropout rate is **at or above 10%**, is *approaching* expectations if its dropout rate is **below 10%**, *meets* expectations if its dropout rate is **at or above the state average** and *exceeds* expectations if its dropout rate is **at or below 1%**. The 10% approximates to the dropout rate at the 15th percentile of Colorado high schools, while the 1% approximates to the 80th percentile of Colorado high schools.

For the ACT measure, a school or district *does not meet* expectations if its average composite score is **below 17**, is *approaching* expectations if its average composite score is **at or above 17**, *meets* expectations if its average composite score is **at or above the state average** and *exceeds* expectations if its average composite score is **at or above 22**. The 17 approximates to the minimum admission requirement for community colleges in Colorado, while the 20 approximates to the ACT college readiness benchmarks, and the 22 approximates to the median average ACT composite score of enrolled students at typical four-year institutions. The college readiness benchmarks are defined by ACT as the minimum score required for students to have a high probability of success in credit-bearing college courses (a 50% or higher probability of earning a B or higher in the corresponding college course(s)). The 20 is slightly below the national average of 21, but whereas in most states it reflects only college-bound students, in Colorado it reflects all 11th graders, as the ACT is a required state assessment.

The state averages for the dropout and ACT measure are listed in Tables 13 and 14, below, and can be found on the back page of each SPF and DPF report.

Table 13. Postsecondary and Workforce Readiness: State average dropout rates – 2009 baseline (1-year SPF) or 2007-09 baseline (3-year SPF)

	N of Students	Average Dropout Rate
1-year (2009)	416,953	3.6
3-year (2007-09)	1,238,096	3.9

Table 14. Postsecondary and Workforce Readiness: State average ACT composite scores – 2010 baseline (1-year SPF) or 2008-10 baseline (3-year SPF)

	N of Students	Mean Score
1-year (2010)	51,438	20.0
3-year (2008-10)	151,439	20.1

As with the Academic Achievement measures, setting the AMOs using a real baseline enables schools, districts and the state to gauge progress from year to year. Through a rating system, improvements are measured by the change in the number of schools/districts that receive each of the ratings, from *does not meet* to *approaching* to *meets* to *exceeds*. The *exceeds* cut-point incentivizes those schools/districts that are already meeting state expectations to push performance even higher. At the same time, using normative baselines allows the states to target support to those below the 15th percentile. This 2009-10 and 2008-09 baseline, however, will not always define the AMOs. The AMOs are annually reviewed by CDE and reset or affirmed by the State Board of Education. As CDE sees improvements in the system and integrates a new assessment, we will update AMOs to raise the bar to drive continuous improvement.

In the areas where graduation rates, dropout rates and ACT scores are not used for accountability purposes within the performance frameworks, Colorado still reports them on the SchoolView Data Center. The Data Center reports, for each school, district and the state, the rates/scores of graduation, dropout and ACT, including ACT scores by subject. Users can disaggregate the data by grade, race/ethnicity (American Indian/Alaskan Native, Asian, Black, Hispanic, White), gender and student group (Gifted and Talented, Students with Disabilities, Migrant, Economically Disadvantaged, English Learners). CDE intends to add the rate/score cut-points needed to receive a *meets* or *exceeds* on the SPF/DPF as a line to show the AMOs for schools and districts.

ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below.

The rationale for each of the specific AMOS is described in detail in 2.B.i. Overall, the AMOs are meant to strike a balance between being ambitious and being attainable, and are meant to reflect an aggregate of student-level performance such that improvements at the school- and district-level mean improvements for each individual student. They were set in consultation with schools, districts and other stakeholders, particularly Colorado's SB-163 Superintendents Advisory Council and the Technical Advisory Panel, both panels comprised of field staff. Colorado continues to value stakeholder input throughout the implementation process, and will be meeting next on the performance frameworks on November 29 with an advisory group of regional superintendent representatives.

Ambitious and attainable performance targets are achieved through Colorado's school and district performance framework reports by setting minimum state expectations at the *meets* cut-point, then setting higher expectations at the *exceeds* cut-point. Having these tiered levels of performance allows Colorado to set AMOs that are stable, while also providing an increased target for schools that reach the minimum target. Stability within the targets is critical so that schools and districts know what they are aiming for, and can monitor progress towards the AMOs. However, the added AMOs for the *exceeds* cut-point, and the potential for the system to re-norm once broad improvements are seen, provide added incentives for schools and districts to continuously improve.

The purposeful setting of the *does not meet*, *approaching*, *meets*, and *exceeds* also allows for the state to use the performance frameworks to differentiate support. The roll-up of ratings on each of the performance indicators total up to an overall framework score and identify the state's schools and districts on Priority Improvement and Turnaround, the state's lowest-performing 15 percent. CDE can identify those that *do not meet* or *approach* state expectations within Academic Achievement, Growth, Growth Gaps and Postsecondary and Workforce Readiness and understand the performance challenges for each school and district.

Schools and districts also use the ratings to inform their improvement efforts. Within the unified improvement plan that schools and districts annually submit to the state, they are required to address all areas where they receive a *does not meet* or *approaching* on their performance frameworks. This involves a data analysis and narrative that describes positive and negative trends, and prioritizes the performance challenges, followed by a root cause analysis, strategies to address the root causes, and interim targets to get to state expectations. For example, if a school is *approaching* on Growth, they must dig into the data, likely by disaggregating by content area, grades, race/ethnicity, or student groups, then identify what these disaggregations reveal about the content, grades, race/ethnicity or student groups that need the most prioritization, determine why these areas/students are below performance, and develop strategies to overcome the low performance.

iii. If the SEA set AMOs that differ by LEA, school, or subgroup, do the AMOs require LEAs, schools, and subgroups that are further behind to make greater rates of annual progress?

Colorado does not set AMOs that vary by LEA, school or subgroup in terms of the cut-points required to receive each of the *approaching*, *meets*, or *exceeds* ratings on the performance frameworks. We hold all students, subgroups, schools and districts accountable to the standard of college- and career- readiness. However, because some students, subgroups, schools and districts start further behind, getting to the standard will require greater rates of annual progress. Within the measures, the expected performance levels also vary within the Growth and Growth Gaps indicators. Adequate growth percentiles are higher for subgroups/schools/districts that are further behind. Depending on whether or not a subgroup/school/district has made adequate growth – the amount of growth needed to be proficient – they are held to different rates of median growth, such that those who have not made adequate growth will need to make higher rates of normative growth.

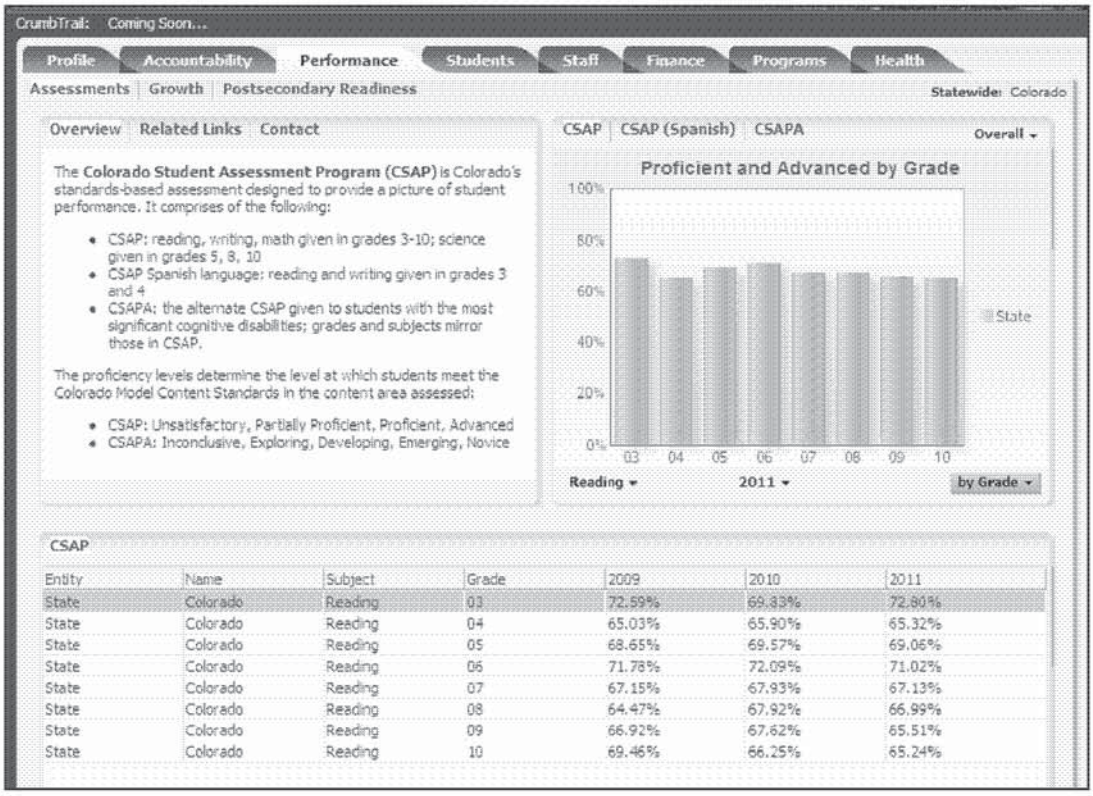
In addition to the state-set AMOs, schools and districts are also required to set individualized school- and district-level targets within their unified improvement plan, at a minimum for all the areas where they receive a *does not meet* or *approaching* rating. They must set targets in a way that will put them on a path to *meet* minimum state expectations or *exceed* them. For accountability purposes, these targets must allow them to *meet* expectations within at least five years. Consequences follow for the Priority Improvement and Turnaround schools and districts that don't reach that goal, as described in other parts of this application. Schools and districts are also expected to use interim measures that track their progress towards the annual state performance targets, and to review these quarterly at the school- and district-level with their stakeholders.

iv. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

While all of the requested data is available at the SchoolView, we have also provided the high level data in Attachment 8, where you will find the academic achievement data for reading and math by grade and by disaggregated group. Also included is the academic growth data for reading and math reported by grade and disaggregated group.

The SchoolView Data Center can be accessed at www.schoolview.org/performance.asp by clicking on the "SchoolView Data Center" button. Once in the Data Center, navigate to the "Performance" tab. From here any member of the public can investigate the CSAP, CSAP (Spanish) and CSAPA data for the state. These data are available by specific content area (Reading, Math, Writing, and Science), disaggregated by grade, ethnicity, gender, or student group (economically disadvantaged, English learner, students with disabilities, migrant or gifted and talented). Trend data are also provided. To get even more detailed information, use the drop down labeled "Overall" in the upper right corner and select "Detail."

As approved in Colorado's Accountability Workbook for Title I, proficiency is defined as Partially Proficient, Proficient and Advanced. The state has determined that in a comprehensive, single state accountability system focused on college- and career- readiness, it is important to include only proficient or advanced scores, thus holding itself accountable to a higher but more defensible standard. Thus, the data in the NCLB State Report Card and EDFacts files will not match what is presented below.



Entity	Name	Subject	Grade	2009	2010	2011
State	Colorado	Reading	03	72.59%	69.33%	72.80%
State	Colorado	Reading	04	65.03%	65.90%	65.32%
State	Colorado	Reading	05	68.65%	69.57%	69.06%
State	Colorado	Reading	06	71.78%	72.09%	71.02%
State	Colorado	Reading	07	67.15%	67.93%	67.13%
State	Colorado	Reading	08	64.47%	67.92%	66.99%
State	Colorado	Reading	09	66.92%	67.62%	65.51%
State	Colorado	Reading	10	69.46%	66.25%	65.24%

2.C REWARD SCHOOLS

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

CDE has traditionally recognized the most outstanding performers among Colorado schools. Currently, several state and federal award programs recognize schools with strong performance or sustained improvement in performance. The specific reward programs and the methodologies used to identify recipients are outlined below.

Governor's Distinguished Improvement Award- High-Progress

These awards are granted to elementary, middle and high schools in the state that demonstrate the highest rates of sustained student longitudinal growth across multiple years. The intent of this award aligns with the USDE's proposed "High-progress" reward. CDE will use the results from the 3-year School Performance Frameworks, specifically the Academic Growth to Standard and Academic Growth Gaps indicators, to determine eligibility. Schools must receive a rating of *exceeds* on the Academic Growth to Standard indicator and a rating of *meets* or *exceeds* on the Academic Growth Gaps Indicator. This latter condition ensures that only schools demonstrating the highest levels of growth across all student sub-groups are identified, in furtherance of aligning this award with USDE's intent. Additionally, high schools must also have ratings of m*eets* or *exceeds* on the Graduation Rate sub-indicator ratings to receive the Governor's Distinguished Improvement Award. This ensures that all high schools identified have graduation rates above 80%. In 2011, 200 schools (approximately 10% of all schools in the state) will receive the Governor's Distinguished Improvement award.

John Irwin Schools of Excellence Award- High Performance

These awards are granted to elementary, middle and high schools whose level of attainment on the student achievement performance indicators is within the top eight percent of all public schools in the state. This award closely parallels USDE's proposed "high-performance" reward, and CDE will take steps to ensure further alignment. CDE will utilize the results from the 3-year School Performance Frameworks to determine qualifying schools. The selection criteria include a rating of *exceeds* on the Academic Achievement indicator, a rating of *meets* or *exceeds* on the Academic Growth Gaps indicator and for high schools a rating of *meets* or *exceeds* on the Graduation rate sub-indicator. Performance on the Growth Gaps indicator has been added to ensure adequate performance across all subgroups. CDE has also added the graduation requirement to closer align with USDE's definition and ensure that recognized high schools are indeed exiting postsecondary and workforce ready individuals. In 2011, John Irwin Awards will be given to 199 schools (approximately 10% of all schools in the state.)

Title I Distinguished Schools

Each year, Colorado recognizes two Title I Schools for student achievement. Since the passage of NCLB, these awards have used AYP data for criteria. The Exemplary Achievement Award is presented to the school with the highest number of students who are partially proficient, proficient or advanced on aggregate CSAP scores for all grades served. The Closing the Achievement Gap Award is presented

to the school with the highest aggregate CSAP scores that has also significantly closed the gap between two identified groups of students (i.e., minority vs. non-minority.) However, upon approval of our single, comprehensive accountability system, the Exemplary Achievement Award will be selected from the highest Title I school in the John Irwin Schools of Excellence pool. The Closing the Achievement Gap Award will be based upon improvements in the Academic Growth Gaps indicator. These changes will be made to ensure that Title I awards and recognition are aligned with the comprehensive accountability measures.

Centers of Excellence Award

These awards are granted to the elementary, middle and high schools: (1) with at least a 75% at-risk population, and (2) demonstrating high rates of sustained student longitudinal growth across multiple years, measured by median student growth percentiles. Colorado's definition for at risk includes students eligible for Free or Reduced-price meal programs and/or English language learners. CDE will rank eligible schools by the percent of points earned on the Academic growth indicator of the 3-year School Performance Framework, and then identify the highest performers. In 2010, 32 schools (approximately 10% of schools with at least 75% at-risk students) received Centers of Excellence awards.

Blue Ribbon School

Nominees for the Blue Ribbon award qualify as either (1) high performing –top 10% of schools in the state as measured by state tests in both reading and math, or (2) dramatically improved –40% of the student body is from disadvantaged background and the school has dramatically improved student performance in reading and math on state assessments. Colorado nominates 5 schools each year, 2 in the high-performing category, and 3 in the dramatically improved category. If our waiver request is approved, criteria will be directly aligned to the indicators in the performance frameworks.

2.C.ii Provide the SEA's list of reward schools in Table 2.

The highest-performing and high-progress schools, identified as reward schools, are noted in Attachment 9.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

High performing and high-progress schools are publically recognized and rewarded in a number of ways.

Under the Governor's Distinguished Improvement, John Irwin, and Centers of Excellence award programs each recipient is issued a certificate and the award is announced in a press release and in CDE's weekly newsletter, *The Scoop.* The recognition culminates in a media event that coincides with the release of the School and District Performance Framework reports. The 2010 event included congratulatory speeches from then-Colorado Governor Ritter and the CDE Commissioner and Associate Commissioner. Attendance at these events by students, teachers and school and district

leaders, along with their positive feedback, serves as an important affirmation of their hard work.

For the Title I Distinguished School program, each designated school receives $10,000. A high-ranking CDE official makes the announcement at the school and provides a large cardboard check and an engraved statue to school leadership. This ceremony provides an excellent media opportunity at both local and state level. A press release is also issued.

The Legacy Foundation award honors a number of Colorado's high-achieving, innovative schools, with a crystal apple, certificate and luncheon.

Finally, recipients of the Blue Ribbon School award are honored at a ceremony in Washington, D.C. each November.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

The Secretary's desire to identify two sets of schools – priority schools, which are the state's lowest performers in terms of overall student performance, and focus schools, which are the state's lowest performers in terms of student gaps – is consistent with Colorado's goal of raising the bar for overall performance of all schools and closing the achievement gap among student groups. Colorado sees value in focusing attention on these schools. The state also sees an opportunity to integrate the identification of priority and focus schools within the state's accountability system.

Colorado's lowest-performing schools are those identified through the comprehensive school performance measures described in Principle 2.A.i. Namely, schools assigned Turnaround and Priority Improvement plans are identified as the state's lowest-performing schools. Schools in these two categories struggle with Academic Achievement, Academic Growth to Standard, Academic Growth Gaps, and Postsecondary Workforce Readiness. These are the schools and districts that require interventions, are prioritized for support, receive detailed feedback on their UIPs, and are more rigorously reviewed on their use of federal funds.

Colorado's system was designed to identify about 15% of the lowest performing schools – 5% in the Turnaround (5%) and 10% in Priority Improvement, as shown in Table 15.

Table 15. School Performance Framework Plan Type Results.

	Percent of Schools Identified 2010-11 Initial Results	Percent of Schools Identified 2011-12 Initial Results (non-revised framework)
Performance	65.9	69.0
Improvement	20.8	18.6
Priority Improvement	8.3	8.9
Turnaround	5.1	3.5

Using the amended framework, including CELApro Growth and disaggregated graduation rates, for 2010-2011, 79 schools would be identified as Turnaround (3.91%) and 191 schools (9.4%) would be identified as Priority Improvement. Of Title I schools, 42 would be Turnaround schools (6.2% of Title I schools) and 117 would be Priority Improvement (17.3%). Colorado has chosen to treat 23% of its Title I schools as Turnaround and Priority Improvement schools based on the needs it has identified in those schools – well more than the minimum 5% threshold. Over the course of the waiver period, Colorado intends to reduce that percentage through its continuous improvement process.

Table 16. Summary of Turnaround and Priority Improvement Schools in Colorado.

	Number of Schools Identified as Turnaround	Number of Schools Identified as Priority Improvement	Number of Schools Identified as Turnaround or Priority Improvement	Percent of Schools Identified as Turnaround or Priority Improvement	Percent of Title I Schools (exceeds 5% and 10% minimums)
All Schools	79	191	270	13.35%	
Title I Schools	42	117	159	7.9%	23.5%

Colorado proposes to continue using the Turnaround and Priority Improvement designations to identify the lowest-performing "priority" schools in the state. Fairly consistent definitions apply to both the USDE and Colorado system, as shown in the Table 17.

Table 17. Alignment of USDE definitions with Colorado's Implementation

USDE Definition	Colorado Implementation
• A school among the lowest five percent of Title I schools in the State based on the achievement of the "all students" group in terms of proficiency on the statewide assessments that are part of the SEA's differentiated recognition, accountability, and support system, combined, and has demonstrated a lack of progress on those assessments over a number of years in the "all students" group;	• The lowest performing schools, based on the School Performance Frameworks (Colorado's differentiated accountability, support, and recognition system), encompassed by the following indicators for performance by its entire student body: - Academic Achievement - Academic Growth to Standard - Academic Growth Gaps to Standard - Postsecondary Workforce Readiness
• A Title I-participating or Title I-eligible high school with a graduation rate less than 60 percent over a number of years; or	• Based on the Graduation Rate indicator within Postsecondary and Workforce Readiness: - Schools with less than a 65% graduation rate receive a *does not meet* rating
• A Tier I or Tier II school under the SIG program that is using SIG funds to implement a school intervention model.	• Schools will be identified as Tier I or II for the SIG program based on ratings of Turnaround, or Priority Improvement

Colorado firmly believes that the best way to identify the schools most struggling to prepare students for college- and career- readiness is through the Academic Growth to Standard indicator, as shown by the data presented in Principle 2.A.i. While schools with low proficiency may need support, status is not the only indicator that matters with regard to defining the lowest-performing schools. Clearly, schools with low proficiency and low growth to standard are the lowest-performing schools. However, schools with high proficiency but low Academic Growth to Standard are not on track to sustain proficiency, and also need support and intervention. Students in these schools will quickly fall behind if interventions don't occur. Schools with low proficiency but high Academic Growth to

Standard may not currently have proficient students, but are on track to prepare students for college- and career- readiness. While these schools need to be monitored to ensure that their growth to standard continues, Colorado sees limited value in intervening in schools that are making adequate growth. Thus, the Academic Growth to Standard is the most important indicator in the system, which is why it is weighted the most heavily (along with Postsecondary and Workforce Readiness, for high schools). Table 18 shows the alignment with Turnaround and Priority Improvement levels, and the lowest Academic Growth to Standard.

Table 18. Comparison between Academic Growth to Standard and Overall Rating

	Schools that Received a *does not meet* on Academic Growth to Standard on their official SPF	Number of Those Schools Identified as Turnaround or Priority Improvement	Percent of Schools Identified as Turnaround or Priority Improvement	Percent of Title I Schools
All Schools (including Title I schools)	72	71	98.6%	
Title I Schools	37	37	100%	5. 6%

In order to address the USDE graduation rate criteria, the schools that received a *does not meet* rating on the overall Graduation Rate indicator were examined. In Colorado, any school with a graduation rate lower than 65% receives a *does not meet* rating. Of the Title I schools that received *does not meet* on Graduation Rate, 83% are on Priority Improvement or Turnaround, as shown in Table 19.

Table 19. Comparison between Graduation Rate and Overall Rating

	Schools that Received a *does not meet* on Graduation Rate on their official SPF	Number of Schools Identified as Turnaround or Priority Improvement	Percent of Schools Identified as Turnaround or Priority Improvement	Percent of Title I High Schools
All Schools (including Title I)	27	16	59.3%	
Title I Schools	5	4	80.0%	8.9%

Of the 11 schools that are not Priority Improvement or Turnaround, 10 are Improvement schools and 1 is a Performance school. There is only one Title I school in this category, which is one of the 10

Improvement schools. Many of these schools are included in the USDE High School Graduation Initiative. Colorado will examine whether it is possible to completely align the remaining schools with the USDE High School Graduation Initiative. Alternatively, the State can flag these schools as Low Graduation Rate schools and UIP reviewers can provide a closer review. There are 4 online schools in the 11 listed above. Colorado needs to further research these schools and the reasons for their low graduation rates.

By identifying priority schools through the School Performance Framework ratings of Turnaround and Priority Improvement, Colorado captures schools with low achievement, low growth to standard, and, for high schools, low graduation rates. This system of identification will ensure that schools that are most challenged in preparing students for college- and career- readiness are identified for support, intense interventions and heightened fiscal review.

2.D.ii Provide the SEA's list of priority schools in Table 2.

a. Did the SEA identify a number of priority schools equal to at least five percent of its Title I schools?

Based on criteria b (i), (ii), and (iii) listed below, Colorado has 286 schools listed in Attachment 9 as Priority Schools, of those 164 are Title I schools. This results in 24% of Title I schools and 14% of all schools, identified as priority schools.

b. Did the SEA's methodology result in the identification of priority schools that are —

(i) among the lowest five percent of Title I schools in the State based on the achievement of the "all students" group in terms of proficiency on the statewide assessments that are part of the SEA's differentiated recognition, accountability, and support system, combined, and have demonstrated a lack of progress on those assessments over a number of years in the "all students" group;

Schools coded as "C" in Attachment 9 represent the schools with the lowest performance in the state in Academic Achievement, Academic Growth to Standard to Standard, Academic Growth Gaps, and Postsecondary Workforce Readiness. 270 schools are listed as "C" or "CE", and 159 of those are Title I schools (23% of Title I schools).

(ii) Title I-participating or Title I-eligible high schools with a graduation rate less than 60 percent over a number of years; or

Colorado identified 11 additional high schools with graduation rates less than 65% (those that received a *does not meet* rating on the Graduation Rates indicator) as priority schools coded with a "D" in Attachment 9. Only one of these schools is a Title IA served school.

(iii) Tier I or Tier II schools under the School Improvement Grants (SIG) program that are using SIG funds to fully implement a school intervention model?

Five additional schools that are recipients' of the SIG funds were identified as "E" priority school in Attachment 9. Another 24 were already identified as "C" schools as a result of low-performance. These schools are labeled as "CE" schools in the attachment.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

In order to ensure that identification as Turnaround or Priority Improvement motivates increased performance to ensure college- and career- readiness for all students, schools identified for Turnaround and Priority Improvement must implement a number of required interventions. Interventions include: (1) UIP requirements, (2) parent notifications, (3) Choice and SES, and (4) Turnaround actions.

1. UIP requirements

Colorado law (SB-163, the Education Accountability Act) requires that all schools submit a Unified Improvement Plan for public posting on SchoolView, but schools with Turnaround and Priority Improvement plan type assignments must submit their plans to CDE three months prior to the posting deadline for review by CDE staff. CDE provides Turnaround and Priority Improvement schools with specific, actionable feedback that will assist them in their improvement efforts. To inform these reviews, CDE reviews against a set of Quality Criteria. These elements are those that would be included as part of a high-quality improvement plan. The Quality Criteria include "look-fors" such as those listed below, with the full list available at:
http://www.cde.state.co.us/Accountability/Downloads/QualityCriteria-School.doc.

- Data Analysis and Narrative
    - Describes trends in data that reflect that the school/district reviewed the SPF and DPF and specifies where the school/district did not meet state expectations.
    - Reflects that the school/district reviewed progress towards prior year's performance targets.
    - Prioritizes performance challenges, areas on which the school/district must focus attention.
    - Describes root causes of performance challenges such that, if removed, would eliminate or substantially alleviate the performance challenges.
    - In describing root causes, specifies causes the school can control (e.g., the school does not provide additional support/interventions for students performing at the unsatisfactory level) rather than describing characteristics of students (e.g., race, poverty, student motivation); considers broad, systemic root causes (e.g., leadership,

teacher effectiveness, curriculum alignment, instructional time, school climate).

- Describes stakeholder involvement in plan development (e.g., School Accountability Committee, staff, parents, community members).

- Targets and Interim Measures
  - Identifies the specific, quantifiable performance outcomes and interim measures that allow the school to determine, both formatively and summatively, whether the improvement efforts are making the desired difference.
  - Specifies ambitious but attainable targets for every performance indicator (Achievement, Growth, Growth Gaps, Postsecondary and Workforce Readiness) where the school did not meet state expectations, including the disaggregated subgroups to which they apply (e.g., 3rd grade, English learners)
  - Sets targets for increasing performance over time in a way that would, at a minimum, result in the school meeting state expectations within five years.
  - Identifies the measure and associated metric of student performance used to assess performance more than once a year

- Improvement Strategies
  - Describes an overall research-based approach based on a theory about how performance will improve.
  - Describes the specific change in practice that will result from the action steps (e.g., not "improve reading instruction," rather "implement formative assessment practices in all 3rd -10th grade classrooms during reading instruction").
  - If the school/district is identified for Turnaround, at least one of the approaches outlined in SB-163, C.R.S. (3) (d) (see School and District Turnaround Options, below).
  - Describes the action steps that will be taken to implement the improvement strategies, including the timeline, key personnel, resources and implementation benchmarks.

Additionally, a State Review Panel reviews all school Turnaround plans and has the option of reviewing Priority Improvement plans. The State Review Panel is charged with considering the following:

- Whether the school's/district's leadership is adequate to implement change to improve results;
- Whether the school's/district's infrastructure is adequate to support school improvement;
- The readiness and apparent capacity of the school/district personnel to plan effectively and lead the implementation of appropriate actions to improve student academic performance;

- The readiness and apparent capacity of the district/school personnel to engage productively with and benefit from the assistance provided by an external partner;
- The likelihood of positive returns on state investments of assistance and support to improve the district's/school's performance within the current management structure and staffing; and
- The necessity that the district or school remain in operations to serve students.

2. Parent notification

Colorado law (HB11-1126, Improving Parent Involvement) requires districts to inform parents of a school's assignment to an Improvement, Priority Improvement or Turnaround Plan within thirty days of notification. This communication must include a timeline for creating the UIP and notification of a public hearing to review the final plan before adoption

3. Choice and SES

Recognizing that improvement plans may take the entire school year to implement and even longer to yield growth in student achievement, other immediate options need to be available to parents and students. Colorado will maintain options for School Choice Transportation (Choice) and Supplemental Educational Services (SES) for Priority Improvement and Turnaround schools. School districts with Priority Improvement or Turnaround schools must set-aside 15% of the district's Title I funds to cover costs associated with School Choice Transportation and SES. Districts must provide parents with timely written notification of these options for their child.

Districts that meet demand for SES and Choice by the end of the first semester will be required to use the remaining set-aside funds to provide extended learning opportunities, such as before- or after-school programs, and summer school Priority Improvement or Turnaround schools. For example, if a district has spent 10% of the 15% set-aside, it could target the remaining 5% on a single school or all Priority Improvement or Turnaround schools. Including extended learning opportunities as a core intervention strategy will enable each school to improve student achievement through an expanded schedule that provide more instructional time in math, literacy, science, and other core subjects to enable students to meet state standards; integrates enrichment and applied learning opportunities into the school day that complement and align with state standards; and increased time for scheduling and organizing more time for planning, analysis, lesson design and professional development for teachers. At the end of the school year, unencumbered set-aside funds may be carried over into the next year as an extended learning opportunity set-aside or as regular Title I funds.

In addition, school districts that have Priority Improvement or Turnaround schools may, at the discretion of the district, set aside an additional 10% of its Title I funds to provide professional development tied to areas where the district's performance falls short of expectations, similar to the current District Improvement set-asides. A Priority Improvement or Turnaround school district that has no Priority Improvement or Turnaround schools will be required to set aside 10% of its Title I funds in support of

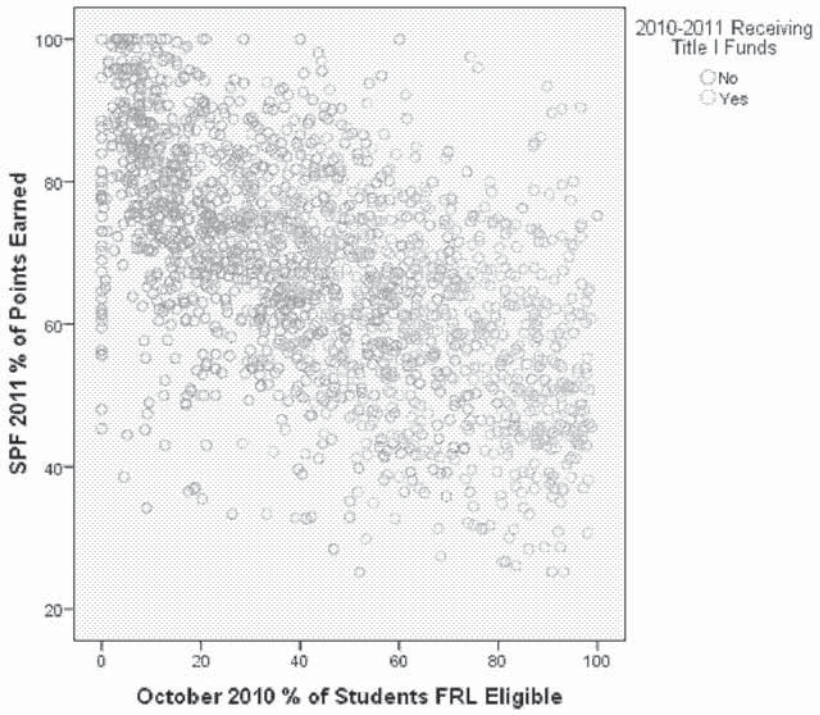
professional development tied to areas where the district's performance falls short of expectations.

The intent of the set-asides covered above is to provide timely options for parents of children enrolled in schools that have been identified as low performing while providing funds to these schools so that they may improve. However, under current rules, many parents do not have options for their children and districts do not have the flexibility to use these set-asides in the schools where they are needed most. Under Colorado's plan choice and SES options will be expanded to include low-performing, non-Title I schools, and districts will have increased flexibility in the use of set-aside funds and the schools they may target.

In the following bubble plot, each circle represents a school in Colorado. Title I schools are orange, and non-Title I schools are green. The x-axis represents the percent of students in the school who qualify for free or reduced price lunch. Schools on the right are high poverty schools, schools on the left have very few eligible students. The Y-axis represents the percentage of points the school earned in the School Performance Framework. Schools near the bottom are low-performing schools, while schools at the top are high performing.

The bubble plot clearly demonstrates that there is not a perfect correlation between poverty rate and Title I status. Many high poverty schools are not served by Title I (green bubbles). Conversely, many low poverty schools are served by Title I (orange bubbles). Poverty is not uniformly distributed in Colorado. There is a high degree of variability in Colorado school district poverty rates and thresholds for Title I eligibility. A school that is Title I eligible in one district may fall below the Title I eligibility threshold of another district. Limiting consequences and identifications to only Title I schools, excludes many students, including many economically disadvantaged students.

The chart also shows a relationship between the poverty rate of the school and its academic performance. While the correlation is not perfect, higher poverty schools tend to have lower performance and lower poverty schools tend to have higher performance. However, there are many high poverty schools with high performance, and many low poverty schools with low performance.



For those non-Title I, low-performing schools, many of which are also high poverty (green bubbles at the bottom of the chart), it is important to ensure that options are available for students. Therefore, under Colorado's plan, Title I set-aside funds and school improvement funds may be used to provide choice options and interventions in low performing schools regardless of that school's Title I status.

4. School Turnaround Options

Colorado law (SB-163, the Education Accountability Act) specifies additional interventions that must be taken for schools identified as Turnaround, as outlined below. Additionally, no school may remain on Turnaround or Priority Improvement status for more than five consecutive years.

C.R.S. (3) (d) Identify specific, research-based strategies that are appropriate in scope, intensity, and type to address the needs and issues identified pursuant to paragraph (c) of this subsection (3), which strategies shall, at a minimum, include one or more of the following:

(I) Employing a lead turnaround partner that uses research-based strategies and has a proven record of success working with schools under similar circumstances, which turnaround partner shall be immersed in all aspects of developing and collaboratively executing the turnaround plan and shall serve as a liaison to other school partners;

(II) Reorganizing the oversight and management structure within the public school to provide greater, more effective support;

(III) For a district public school, seeking recognition as an innovation school or clustering with other district public schools that have similar governance or management structures to form an innovation school zone pursuant to article 32.5 of this title;

(IV) Hiring a public or private entity that uses research-based strategies and has a proven record of success working with schools under similar circumstances to manage the public school pursuant to a contract with the local school board or the institute;

(V) For a district public school that is not a charter school, converting to a charter school;

(VI) For a district charter school or an institute charter school, renegotiating and significantly restructuring the charter school's charter contract; and

(VII) Other actions of comparable or greater significance or effect similar to those delineated under NCLB, including turnaround, restart, close/restart and transformation models.

School Timeline and Consequences

Colorado law specifies additional interventions that must be taken for schools identified as Priority Improvement or Turnaround for more than five consecutive years.

C.R.S. 22-11-210 (5) (a) If a public school fails to make adequate progress under its turnaround plan or continues to operate under a priority improvement or turnaround plan for a combined total of five consecutive school years, the commissioner shall assign the state review panel to critically evaluate the public school's performance and determine whether to recommend:

(I) With regard to a district public school that is not a charter school, that the district public school should be managed by a private or public entity other than the school district;

(II) With regard to a district or institute charter school, that the public or private entity operating the charter school or the governing board of the charter school should be replaced by a different public or private entity or governing board;

(III) With regard to a district public school, that the district public school be converted to a charter school if it is not already authorized as a charter school;

(IV) With regard to a district public school, that the district public school be granted status as an innovation school pursuant to section 22-32.5-104; or

(V) That the public school be closed or, with regard to a district charter school or an institute charter school, that the public school's charter be revoked.

The state review panel shall present its recommendations to the commissioner and to the state board. Taking the recommendations into account, the state board shall determine which of the actions described in paragraph (a) of this subsection (5) the local school board for a district public school or the institute for an institute charter school shall take regarding the public school and direct the local school board or institute accordingly.

If a public school is restructured, the department, to the extent possible, shall track the students enrolled in the public school in the school year preceding the restructuring to determine whether the students reenroll in the public school the following school year or transfer to another public school of the school district, an institute charter school, or a public school of another school district in the state. The department shall provide the student tracking information, without personally identifying the students, to the local school board or the institute upon request.

District Turnaround Options

Consequences for schools on Turnaround and Priority Improvement are included in SB-163 legislation. This legislation ensures that there is accountability for improving school and student performance; and if improvements do not occur, consequences for the schools.

Additionally, SB-163 includes provisions for low performing school districts. In order for schools to make improvements, accountability also needs to exist at the district level.

When a district is identified with a Turnaround plan assignments, SB-163 defines specific options for the district. C.R.S. 22-11-306 (3) (d) Identify specific, research-based strategies that are appropriate in scope, intensity, and type to address the needs and issues identified pursuant to paragraph (c) of this subsection (3), which strategies shall, at a minimum, include one or more of the following:

(I) Employing a lead turnaround partner that uses research-based strategies and has a proven record of success working with schools under similar circumstances, which turnaround partner shall be immersed in all aspects of developing and collaboratively executing the turnaround plan and shall serve as a liaison to other school partners;

(II) Reorganizing the oversight and management structure within the school district or the institute to provide greater, more effective support for public schools;

(III) For a school district, recognizing individual district public schools as innovation schools or clustering district public schools with similar governance or management structures into one or more innovation school zones and seeking designation as a district of innovation pursuant to article 32.5 of this title;

(IV) Hiring an entity that uses research-based strategies and has a proven record of success working with schools under similar circumstances to operate one or more district public schools or institute charter schools pursuant to a contract with the local school board or the institute;

(V) For a school district, converting one or more district public schools to charter schools;

(VI) For the institute, renegotiating and significantly restructuring an institute charter school's charter contract;

(VII) Closing district public schools or institute charter schools; and

(VIII) Other actions of comparable or greater significance or effect.

District Timeline and Consequences

If at the end of five consecutive years, a district's priority or district Turnaround status has not improved, the following recommendations will occur:

C.R.S. 22-11-209. Removal of accreditation - recommendation - review - appeal - rules.

(1) The department may recommend to the commissioner and the state board that the state board remove a school district's or the institute's accreditation if:

(a) The school district or the institute is accredited with turnaround plan and the department determines that the school district or the institute has failed to make substantial progress under its turnaround plan; or

(b) The school district or the institute has been in the accredited with priority improvement plan category or lower for five consecutive school years; or

(c) (I) The school district or the institute has substantially failed to comply with the provisions of article 44 of this title, concerning budget and financial policies and procedures, or article 45 of this title, concerning accounting and financial reporting; and

(II) The school district or institute has not remedied the noncompliance within ninety days after receipt of notice from the department; and

(III) Loss of accreditation is required to protect the interests of the students and parents of students enrolled in the district public schools or the institute charter schools.

(2) (a) If the department recommends removing accreditation pursuant to this section, the commissioner shall assign the state review panel to critically evaluate the school district's or the institute's performance and to recommend one or more of the following actions:

If the recommendation applies to a school district:

(A) That the school district be reorganized pursuant to article 30 of this title, which reorganization may include consolidation;

(B) That a private or public entity, with the agreement of the school district, take over management of the school district or management of one or more of the district public schools;

(C) That one or more of the district public schools be converted to a charter school;

(D) That one or more of the district public schools be granted status as an innovation school pursuant to section 22-32.5-104 or that the local school board recognize a group of district public schools as an innovation school zone pursuant to section 22-32.5-104; or

(E) That one or more of the district public schools be closed

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

Schools that were identified as Turnaround in 2010-11 submitted the selected turnaround option in their Unified Improvement Plan in January 2011. For all schools identified as Turnaround or Priority Improvement in 2010-11, UIPs were submitted to CDE by January 15th and reviewed by CDE staff. This process has continued through the 2011-12 school year, and will be improved upon into the future through the continuous improvement model.

Additionally, implementation checks for schools that are receiving intensive support through 1003(a) or 1003(g) grants are conducted regularly by performance managers to ensure that meaningful turnaround is taking place. With approval of this waiver request, Colorado will implement the revised choice and SES requirements in the 2012-13 school year.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

When a school or district is no longer identified as Priority Improvement or Turnaround, then it will be considered to have made significant process. Colorado has determined that the cut-points set for Improvement plans represent a minimum standard for school performance. As shown in Appendix 4, a school must receive at least 47% of framework points to receive an Improvement rating. When results in Academic Achievement, Academic Growth to Standard, Academic Growth Gaps, and Postsecondary and Workforce Readiness (if applicable),are combined and schools are able to earn at least 47% of their framework points, then they will exit priority status. While the performance of schools earning only 47% of points is not exemplary (not at Performance level), it is enough to no longer prioritize the State's resources and interventions.

2.E FOCUS SCHOOLS

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

The USDE offers two definitions for "focus" school.

1) a school that has the largest within-school gaps between the highest-achieving subgroup or subgroups and the lowest-achieving subgroup or subgroups or, at the high school level, has the largest within-school gaps in graduation rates; or

2) a school that has a subgroup or subgroups with low achievement or, at the high school level, low

graduation rates.

Colorado has chosen the second option to determine its "focus" schools. AYP and the State Performance Frameworks have both defined achievement gap as the difference among the achievement of disaggregated groups with a standard goal (consistent for all student groups). The State goal is for all students to be college- and career-ready, regardless of race/ethnicity, language proficiency, disability status and economic situation. Thus, we will identify schools with the lowest growth to standard and lowest graduation rates for disaggregated groups of students as "focus" schools.

Schools with a *does not meet* rating for Academic Growth Gaps that are not Turnaround or Priority Improvement schools are identified as focus schools. The majority of schools (82.3%) that have received a *does not meet* rating for Academic Growth Gaps are already identified as priority schools based on their Turnaround or Priority Improvement status.

Table 20. Number of Focus Schools Defined by Academic Growth Gaps.

Schools that Received a *does not meet* on Academic Growth Gaps on their official SPF	Schools that Received a *does not meet* on Academic Growth Gaps on their official SPF	Number of Schools Identified as Turnaround or Priority Improvement	Number of Focus Schools (identified by Academic Growth Gaps)
All Schools	96	79	17
Title I Schools	50	48	2

Because the performance of disaggregated groups of students is important to Colorado, the State will identify the 17 schools (2 of which are Title I schools) that received a *does not meet* rating on Academic Growth Gaps, but were assigned an Improvement or Performance rating, with an "Achievement Gap" flag.

The definition for "focus" school also includes low graduation rates for disaggregated groups. Colorado uses the disaggregated Graduation indicator to identify schools whose disaggregated groups of students don't make the 65% graduation rate. Eighty-three percent of the Title I high schools with a *does not meet* rating for disaggregated Graduation Rates were identified as Turnaround or Priority Improvement.

Table 21. Number of Focus Schools Defined Disaggregated Graduation Rates.

	Schools that Received a *does not meet* on Disaggregated Graduation Rate on their official SPF	Number of Schools Identified as Turnaround or Priority Improvement	Number of Focus Schools (identified by Disaggregated Graduation Rate)
All Schools	33	16	17
Title I Schools	5	4	1

Just like the schools with *does not meet* ratings for Academic Growth Gaps that are not Turnaround or Priority Improvement, the State will flag these additional 17 high schools (1 Title I) with less than 65% disaggregated graduation rates as "Achievement Gap" schools. These are distinct schools from the 17 that were identified by Academic Growth Gaps above.

2.E.ii Provide the SEA's list of focus schools in Table 2.

a. Did the SEA identify a number of focus schools equal to at least 10 percent of the State's Title I schools?

In Attachment 9, CDE has identified 23 schools as Achievement Gap or focus schools. 11 schools were already identified as Priority Schools.

CDE believes that the combined focus on Turnaround and Priority Improvement schools along with the additional Achievement Gap schools (24.5% of Title I schools in Colorado) exceeds the requirement that at least 5% of Title I schools are identified as priority schools and 10% are identified as focus schools.

b. In identifying focus schools, was the SEA's methodology based on the achievement and lack of progress over a number of years of one or more subgroups of students identified under ESEA section 1111(b)(2)(C)(v)(II) in terms of proficiency on the statewide assessments that are part of the SEA's differentiated recognition, accountability, and support system or, at the high school level, graduation rates for one or more subgroups?

Colorado identified additional schools as "focus" schools if they received a *does not meet* rating in Academic Growth Gaps, when looking at the median growth percentile compared

to the adequate growth percentile for minority students, English learners, economically disadvantaged students, students with disabilities and students needing to catch-up. Specific cut-points for receiving *does not meet* are described in Principle B. Additionally, any school that received a *does not meet* rating for Disaggregated Graduation Rates (less than a 65% 4-, 5-, 6 -or 7-year graduation rate) was also identified as a "focus" school. Schools will only be identified as "focus" in Colorado if they are not already identified as Turnaround or Priority Improvement.

c. Did the SEA's methodology result in the identification of focus schools that have —

(i) the largest within-school gaps between the highest-achieving subgroup or subgroups and the lowest-achieving subgroup or subgroups or, at the high school level, the largest within-school gaps in the graduation rate; or

(ii) a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate?

CDE focused upon definition (ii). We hold all subgroups to the same high targets of growth to standard and graduation rate expectation.

d. Did the SEA identify as focus schools all Title I-participating high schools with a graduation rate less than 60 percent over a number of years that are not identified as priority schools?

Colorado identified any high schools that received a *does not meet* rating for Disaggregated Graduation Rate as focus schools, if they were not already identified. Colorado expects at least a 65% graduation rate in order to receive an *approaching* rating.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Focus schools that are identified as Turnaround or Priority Improvement will be required to conduct the same activities as described in 2.D.iii, including completing the UIP, notifying parents, offering choice and SES, and for Turnaround schools, implementing a turnaround option.

There are 34 schools that would be identified as "focus" schools that are not Turnaround or Priority Improvement schools (11 of which are identified as priority based on graduation rates). Because the performance of disaggregated groups of students is so important to Colorado, the State will provide the schools that received a *does not meet* rating on Academic Growth Gaps or Disaggregated Graduation Rate with an "Achievement Gap" flag. These schools, like all schools, will complete the Unified Improvement Plan and specifically address any areas in which they received a *does not meet*

rating. Thus, they will analyze data, identify root causes and create action plans around their achievement gap issues. Additionally, CDE will review their Unified Improvement Plans and provide constructive feedback.

Achievement Gap schools will be eligible for the same individualized support as Turnaround and Priority Improvement schools. Eligibility for the School Diagnostic Review Grants and School Improvement Support Partnership Grants (described in more detail in Principle 2.G), will include "focus" schools. As these supports begin with a comprehensive study of the specific needs of the school, the interventions will apply equally to the "focus" schools identified as Improvement or Performance and those identified as Turnaround or Priority Improvement.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

For "focus" schools, if the school receives a *meets* or *exceeds* rating for Academic Growth Gaps and Disaggregated Graduation Rates, it will be considered to have made significant progress. Colorado has determined that the cut-points set for *meets* represent a minimum standard for performance. In order to receive a *meets* rating for Academic Growth Gaps, the combined points for minority students, English learners, economically disadvantaged students, students with disabilities and catch-up students, needs to equal at least 62.5% of indicator points. Each disaggregated group for which the school is eligible can receive up to 4 points, per content area. Depending upon whether or not the median growth percentile is equal to or greater than the adequate growth percentile, the disaggregated group receives 1, 2, 3 or 4 points based on the median growth percentile. In order to receive a *meets* rating, the disaggregated group needs to have a median growth percentile of 45, if adequate growth was attained, or a median growth percentile of 55, if adequate growth was not attained. The specific points are described in Principle 2.B. Once the standard criteria of *meets* is met for Academic Growth Gaps, then a school will be considered to have made significant progress in increasing performance for traditionally under-served students.

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE 1 SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

As shown in Figure 2, there are universal components to the State's differentiated recognition, accountability and support system which apply to all schools and districts, regardless of their performance framework rating. All schools and districts participate in the Unified Improvement Plan process, a process which builds continuous improvement for student achievement and narrowing achievement gaps by analyzing the instruction students receive. CDE also provides universal supports to all schools and districts in Colorado that are tied directly to increasing the quality of instruction for all students.

Unified Improvement Plan (UIP)

The Unified Improvement Plan (UIP) process embodies Colorado's philosophy of continuous improvement as it requires reflection and action, guiding ALL schools and districts toward focusing their improvement efforts and funds on the areas of greatest need. The UIP process leads schools and districts through in-depth data analyses, identification of performance challenges, root cause analysis of those challenges, and the development of action steps, targets and benchmarks designed to address the performance challenges. In Colorado, the Unified Improvement Planning (UIP) process has become the bridge that links accountability and support.

Colorado knows that creating an improvement plan can significantly focus a school or district's attention on instruction and achievement. However, when schools and districts are asked to complete separate improvement plans for Title I school programs, Title I Improvement, Title II 2141(c) identification, Title III improvement, High Priority Graduation Designations and state Turnaround plans, a school or district's ability to use the plan to focus their actions is lost. Three years ago, in response to growing concerns from the field about the number of required improvement plans, the State set out to design a system that streamlines all improvement planning requirements into one document. The resulting template provided in Appendix 5 or posted on the web (www.cde.state.co.us/accountability/UnifiedImprovementPlanningTemplates.asp) is simple and provides schools and districts with a structure that is flexible enough to meet their own unique planning needs – while still enabling them to meet state (i.e., SB-163 state accountability) and federal (i.e., Titles I, IIA, III) improvement planning requirements. The process has pushed many schools and districts to truly focus on their performance challenges, determine root causes and align resources and actions to address those identified challenges. It is also helping to shift improvement planning from an "event" to a "continuous improvement" cycle.

After phasing in and refining the template over the past two years, all schools and districts are now required to submit an improvement plan using the UIP template. The basic layout includes:

- *A pre-populated report*. This is a brief report created by the state that lists the state and federal accountability expectations, the school or district's performance on the accountability measures and whether the school or district met the expectations. This report also identifies whether the school or district is identified for improvement under state and/or federal accountability.

- *A data narrative*. Schools and districts must: (1) review current performance (including annual performance targets set in the previous year) and describe trends; (2) prioritize performance challenges; (3) determine the root causes of those performance challenges; and (4) create the data narrative. The analysis builds upon the SPF/DPF and AYP status reports as the starting point for data analysis. All districts and schools are expected to consider at least three years of data and **must address indicator areas where they do not at least meet state or federal performance expectations**.

- *Target Setting*. Schools and districts must supply their annual and interim targets for their identified performance challenges. This includes setting targets that meet state and federal requirements. Overall, these performance targets need to move schools and districts aggressively towards state expectations (AMOs) for each performance indicator, while at the same time considering what is possible in a given timeframe and the schools' or districts' current status.

- *Action Planning*. Based on the priority performance challenges identified in the data narrative, schools and districts must then identify major improvement strategies (no more than three). These strategies are then broken into action steps that include timelines, resources and implementation benchmarks.

- *Addenda Forms*. Because of the wide variety of reporting requirements, schools and districts may choose to supplement their UIP document with program specific forms that help to ensure that all state and/or federal requirements are met (e.g., Title I Schoolwide program, Title IIA 2141c).

In completing the UIP process and the components listed above, public accountability is central. Stakeholders, including principals, teachers, parents, and community members are expected to participate in the plan development. Colorado law (HB11-1126, Improving Parent Involvement) requires that in schools rated Improvement, Priority Improvement, or Turnaround Plan districts must inform parents of the timeline for creating the UIP and provide notification of a public hearing to review the final plan before adoption. All schools, regardless of plan type assignment, are expected to hold a public hearing to review the plan before its final adoption by the local board. Staff and accountability committees are required to review school and district progress on a quarterly basis. By requiring a transparent process for improvement planning, schools and districts will ensure that all performance concerns are addressed.

The review, timeline and requirements to be addressed in the UIP are differentiated by the type of identification under state accountability and identification under ESEA programs (i.e., Titles I, IIA and III). This reflects the philosophy that the state increases scrutiny and support for schools and districts that are struggling. Schools and districts identified as Turnaround and Priority Improvement are required to submit plans by January 17th. CDE and a State Review Panel then provide actionable feedback to the schools and districts so that they can revise their plans for submission on April 15th.

The state posts all school and district improvement plans publicly on SchoolView (http://www.schoolview.org/performance.asp) after the April 15th submission. This encourages transparency and local accountability and also enables schools and districts to learn from each other. For example, using the review of plans submitted to CDE in 2010-11, CDE summarized key findings at various follow-up support sessions in the Spring of 2011. CDE also selected examples from the 2010-11 submitted plans to annotate; these annotated reviews present the strengths and weaknesses of the plans to highlight focus areas for all schools and districts. For examples, please see "Unified Improvement Plan Examples" at: http://www.cde.state.co.us/Accountability/UnifiedImprovementPlanningResources.asp . Additionally, CDE has documented the process that schools and districts have engaged in as they implement their unified improvement plans in a local context. Staff, with the support of contractors, are developing a collection of written case stories, artifacts and video to represent the planning successes and challenges of the following districts: Aurora, Cherry Creek, Elizabeth, Falcon, Ft. Lupton, Garfield 16, Greeley, Jefferson County, Montrose, Poudre, St. Vrain, Summit and Woodlin. The content provides perspective on a range of compelling questions, including: (1) How has unified improvement planning been helpful for the district? (2) How have we built staff capacity to engage in the planning process? (3) How did we ensure that data was meaningful to our district's teachers, leaders and their communities? (4) How has our district ensured safe but honest root cause analysis? (5) How did our district use diagnostic reviews to inform our planning? (6) How will our district monitor the implementation of our improvement plan?

Finally, the state differentiates its levels of support for the UIP process depending upon the level of concern for the school or district. CDE has provided a vast number of resources and trainings available to all school and district leadership. Trainings include regional sessions to provide hands-on support for all schools and districts, as well as sessions tailored to the unique needs to Priority Improvement and Turnaround schools and districts. Resources include a guidance handbook, quality criteria (elements of a plan that reviewers should look for), annotated examples, online tutorials and training materials (available from state-sponsored training that can be used for local trainings). To access these resources, please go to: http://www.cde.state.co.us/accountability/UnifiedImprovementPlanningResources.asp.

Tiered System of Supports (TSS)

CDE has developed a tiered system of supports (TSS) to respond to the range of needs in Colorado schools and districts and ensure implementation of interventions in Turnaround and Priority Improvement schools. The system is based on data analyses of the most struggling and most effective schools and districts in the state. This involves increasing degrees of support and funding options for schools and districts that are most impacted. Conversely, it offers increasing levels of autonomy for

higher performing districts. The TSS is a coherent continuum of evidence based, system-wide practices to support a rapid response to academic and behavioral needs. There is follow up with data-based monitoring for instructional decision-making to empower schools and districts to create systems that support each student in achieving college- and career- readiness.

Tiers of supports are organized using performance from the school (SPF) and district (DPF) performance frameworks. Schools and districts with the following designations are provided with the specific supports listed in Table 22 below. Districts with the highest accreditation categories (Accredited with Distinction, Accredited, or Improvement) and schools with the highest plan types (Performance or Improvement) are offered universal supports from CDE, as described below. In addition to these offerings, districts with this level of performance are provided greater levels of autonomy.

In contrast, an increasingly intense set of services and supports are in place for schools and districts that fall into the lowest levels of performance (Turnaround and Priority Improvement).

Table 22. Tiered Support System

District	Schools	Supports
Accredited with Distinction		Universal • CDE Support Manager • Variety of services and support to "Opt In" • Greatest Autonomy
Accredited	Performance Plan	
Accredited with Improvement Plan	Improvement Plan	
Accredited with Priority Improvement Plan	Priority Improvement Plan	• Improvement Manager • Targeted intervention and supports • Reduced program autonomy and flexibility
Accredited with Turnaround Plan	Turnaround Plan	• Improvement Manager • Intensive intervention and supports • Least program autonomy and flexibility

Colorado's accountability system creates incentives to focus on improved student achievement for all

students. As the performance indicators begin at an individual student level, and create student specific adequate growth targets, incentives are built into the measure to encourage schools and district to ensure that all students both meet at least typical median growth, and make enough growth to be on track to become/remain proficient. At the district level, the system has incentivized high performance by committing to allow greater autonomy for those districts at the highest level. Higher performing districts have more discretion in planning, resource allocation and program implementation. At the risk of over-simplifying, for higher performing districts it is, "Call us if you need us." For lower performing districts it is, "You don't need to call us, we'll call you."

Universal and Differentiated Supports

CDE has developed supports in a broad array of content areas. These supports have been created to respond to the range of needs among Colorado schools and districts. Many of the supports are based on data analyses of the most struggling and most effective schools and districts in the state. Although support and technical assistance are available to all Colorado schools and districts, CDE prioritizes low performing school and districts for intensive, ongoing, and purposeful support. Low performing schools and districts are assigned a performance manager who works with schools and districts through a process of diagnostic reviews and root cause analysis to identify needs. Once needs have been identified, the performance manager supports the school and district planning process and matches the school or district with the supports that are most likely to effectively address the needs resulting in improved school and district performance. Among the content areas in which CDE provides support to school districts are:

Support Area	Strengthens	Results in:
Standards Implementation	Curriculum and instruction	Increased student achievement in college- and career- ready standards
Language Acquisition	Curriculum and instruction	
Early Childhood Education	Curriculum and instruction	
Data analysis and interpretation	Continuous improvement	
Literacy	Curriculum and instruction	
Dropout Prevention and Student Engagement	School climate and culture; student engagement	
Adult Education and Family Literacy	Adult, early childhood, parent and community resources	
Gifted Education	Curriculum and instruction	
Response to Intervention	School climate and culture;	

	instruction	
Special Education	Curriculum and instruction	
Educator Effectiveness	Continuous improvement and instruction	
Positive Behavior Interventions and Supports	School climate and culture	
Unified Improvement Planning process support	Continuous improvement	

Each of these supports directly relate to strengthening instruction and increasing student achievement. Through the UIP process and the universal supports available for schools and districts, CDE helps to ensure continuous improvement in all schools, especially those not making progress in improving student achievement and narrowing achievement gaps. The UIP requires schools and districts to identify the indicators in which they *do not meet* or *approach* State targets, identify the root causes, and create action plans to increase student achievement. Schools and districts may access any of the State supports that effectively address their identified root causes.

School Support Team (SST) and Comprehensive Appraisals for District Improvement (CADI) Reviews

The SST and CADI processes are part of "... a statewide system of intensive and sustained support and improvement for local educational agencies and schools... in order to increase the opportunity for all students to meet the State's academic content standards and student achievement standards" (ESEA, section 1117). Colorado created this appraisal process to provide a comprehensive review of schools and districts on ESEA Improvement. With approval of this waiver request, the review processes will focus on schools and districts on Priority Improvement or Turnaround. During the review, teams of highly skilled educators use document analysis, observations, and interviews to collect data around the nine standards that research has shown to be most crucial in becoming a high performing school or district. The process primarily supports three activities:

- Facilitated Data Analysis
- Review Team Visit
- Roll out of Results

Comprehensive System Examination

The schema for a comprehensive system examination blends the outcomes of SST/CADI reviews with a set of TSS implementation rubrics developed around an effective, evidence-based educational

framework. The former identifies areas where a school or district likely needs to put a concentrated focus, whereas the latter provides a rubric against which the school or district can assess its implementation of a coherent continuum of evidence -based, system-wide practices to support a rapid response to academic and behavioral needs. This may impact the school and district's flexibility and use of state, local and federal funds.

Program Quality Indicators (PQIs)

Similar to the CADI and SST standards, indicators, and protocols that will be used to review school and districts *systems,* CDE is developing *ESEA program* quality standards and indicators. The PQIs will be used to assess and improve local program quality, especially among low performing schools and districts. PQIs will be added to Colorado's Federal Integrated Review System (C-FIRS) of program monitoring to help raise the bar from compliance to compliance and quality. Districts identified as Priority Improvement and Turnaround districts will receive Program Quality Reviews to help ensure the maximum return on program investment.

The PQIs will also be used to establish more rigorous criteria for the approval of low performing districts' consolidated applications and the subsequent release of funds. CDE believes that through the infusion of these standards and indicators into the application, monitoring and supports, local program quality will be improved and student achievement will be increased.

Grant Opportunities

CDE has created specific grant opportunities with 1003(a), reallocated 1003(a) and 1003(g) to support School districts and schools identified as Priority Improvement and Turnaround in building their capacity to increase student achievement. The grants have been created to lead schools and districts through an intensive, supported process of continuous improvement. They have been developed by using the data and expertise we've gained through implementing School Improvement Grants over the last 8 years, analyzing the most common challenges in low performing schools and comparing them to our most effective high needs schools. Funds are awarded on a competitive basis and prioritized to those furthest along in the improvement cycle. The following provides a description of the grant opportunities/intensive supports available to the lowest performing schools and districts.

<u>School and District Diagnostic Review Grant</u>

CDE provides funds for planning and appraisal services to eligible Title I schools and districts. Through the grant funds each eligible school/district receives money for a facilitated data analysis, a school or district diagnostic team review (see above) and assistance with incorporating these reviews in Unified Improvement Planning (UIP).

Awarded funds are used for the following purposes:

Facilitated Data Analysis, which includes:

- Review of student performance data

- Identification of trends and performance challenges
- Prioritization of performance challenges
- Root cause analysis
- Engaging relevant stakeholders in data analysis

Contracting for an SST or CADI visit

Integrated Data Roll Out includes a facilitated roll out of results from (1) the data analysis and (2) CADI/SST report findings as related to prioritized performance challenges and integrated into the school/district's root cause analysis.

Support for Action Planning, which may include:

- Verifying the root cause analysis of identified performance challenges;
- Target setting;
- Action planning; and
- Engage relevant stakeholders in action planning process.

School and District Improvement Support Partnership Grants

The purpose of this grant is to provide funds to eligible schools and districts to support a focused approach to improvement in the following areas. The grants are sequential, and Option 1 must be taken first, or evidence must be shown that the activities in Option 1 have already occurred.

Option 1

Facilitated Data Analysis, which includes:

- Review of student performance data;
- Identification of trends; and
- Prioritization of performance challenges;

Option 2

Grant funds for implementation of:

- Best First Instruction;

- Leadership; and/or
- Positive Climate and Culture.

Analysis of some of Colorado's high growth Title I schools and other high performing schools and districts has shown that the three components listed above are the most crucial in school and district turnaround.

Targeted District Improvement Grants

This grant programs utilizes reallocated Title I 1003(a) reallocated funds to support districts which are identified as Accredited with a Priority Improvement or Turnaround plan.

CDE has prioritized partnering with a subset of Priority Improvement and Turnaround school districts in strategic improvement planning, implementation, and progress monitoring process to significantly improve student achievement through Targeted District Improvement Grants which involve the following:

- Creation of a district team to work alongside a CDE Cross Unit team
- Participation in the CADI process
- Team participation in the review of the CADI and prioritization of 3-4 focus areas
- Engagement in root cause analysis of the 3-4 focus areas
- Evaluation of available strategies and resources to address the focus areas
- Creation of district UIP in partnership with the CDE Cross Unit Team that addresses the improvement focus areas
- Partnership with CDE's Cross Unit team for 3 years to implement the plan

Tiered Intervention Grants

This grant program utilizes Title I 1003(g) funds to support districts that have chronically low performing schools in the lowest 5% of achievement (Turnaround schools) as indicated by state assessments. Since this is the lowest tier of schools, the intent of this grant is to provide funding for districts to:

- Partner with CDE in the implementation of one of the four intervention models provided in the guidance for the use of Federal Title I 1003(g) funds;

- Increase the academic achievement of all students attending chronically low performing schools through the development of a coherent continuum of evidence based, system-wide practices to support a rapid response to academic and behavioral needs; and

- Utilize the support and services from external providers in their efforts to accomplish the above.

  Intensive monthly progress monitoring occurs by CDE both onsite, by phone and by other electronic means.

<u>High Growth, High Poverty Schools</u>

The purpose of this grant is to identify Title I schools identified as high growth/high poverty, collect data through a SST review and debrief, and disseminate their best practices to schools with similar demographics around the state, through technology and other means. Through intense quantitative and qualitative data analysis of the Title I schools with the highest median growth percentiles for students needing to catch-up, the state is learning why they were able to achieve high academic growth despite barriers similar to those of the state's lowest achieving schools.

The results from this study are being used to help identify those practices most likely to result in increased achievement among struggling schools in Colorado. The schools are capturing their effective practices through video, written descriptions and a principal summit, in order to share with schools with similar demographics but struggling performance. CDE plans to create a lab school model where these schools can serve as model sites for the state.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

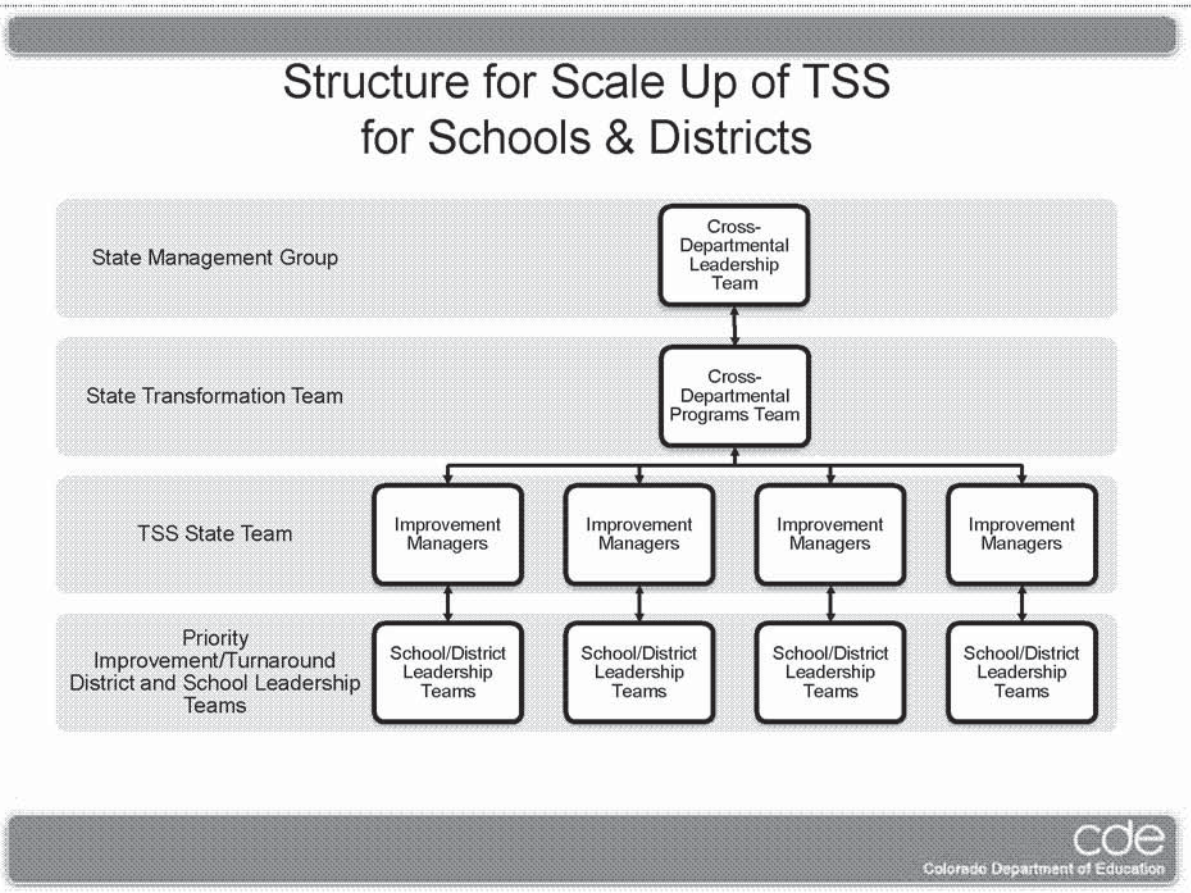
2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;
ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and
iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

a. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

b. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

CDE builds district and school capacity to improve student learning, particularly in Turnaround and Priority Improvement through its system of performance management for continuous improvement. Managers are assigned to all districts; Improvement Managers are assigned to all districts identified as Priority Improvement or Turnaround. Improvement Managers act as liaisons between CDE and districts and schools. They work closely with State Cross-Departmental Programs and Leadership teams as well as local School and District Leadership Teams in identifying needs, planning, implementation, and progress monitoring.



State Performance Management and Monitoring

Districts in Priority or Turnaround status or schools with Priority or Turnaround plan assignments are assigned an improvement manager at CDE. This manager works at both the school and district level to help define needs and resources available to help meet the performance challenges. The intensity and amount of structure in supports increases the longer the school/district remains in the lowest categories. Shared ownership of processes and accountability are key to the State's system.

At the state level, a cross-departmental team meets weekly to create and analyze "data boards" for each of the Priority Improvement and Turnaround schools and districts. This allows CDE to make data-based decisions with input from multiple offices about future activities and interventions and informs the interactions of program staff. The data boards also allow for tracking improvement over time of districts' and schools' performance. Information included on the data boards includes the school/districts' accountability status (DPF/SPF results), grant participation, funding sources and eligibility, the school/district's UIP, and data from the Data Center, such as school climate and teacher equity. CDE Improvement Managers utilize these data boards to better understand the systems in which they are working and to make data-based decisions regarding school and district improvement efforts.

Improvement Managers also perform a liaison role between school districts and external vendors.

Although CDE no longer maintains a list of approved providers, the Department does provide assistance to schools and districts in the vetting of providers. CDE maintains a list of providers by topic area on its website. The site also includes information that can be used and questions that can be asked to ensure the effectiveness of providers prior to entering into a contract for services. Once a vendor has been selected, Improvement Managers facilitate the process of strategy selection and implementation.

Along with the progress monitoring conducted by the Improvement Managers, school Turnaround sites are monitored to ensure both compliance and quality of plan implementation. As part of the Colorado Federal Integrated Review (C-FIR) process, onsite review teams visit school Turnaround sites to ensure that school improvement grant funds are being used effectively and that plans are being implemented with fidelity.

Through this performance management system, which included regular communication and monitoring, CDE believes that the required interventions for Turnaround and Priority Improvement schools will result in increased student achievement in these schools.

Additionally, the results from the effective schools study have informed our focus for the structure, sequence and allowable uses of funds in 1003 (a) and (g) improvement grants.

c. Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

The goal of Colorado's accountability system is not 100% of students meeting basic proficiency levels by a specific point in time. Instead, the goal of the system is for all students to be college and career ready by the time they graduate. The entire system has student growth as its foundation. As outlined in the preceding pages, Colorado's process is designed to foster student, classroom, school, district, and statewide continuous improvement. Colorado's process is likely to help build state and local capacity for the reasons delineated below.

As its core, the system has school and district performance frameworks that were designed with extensive stakeholder input. The frameworks provide a more comprehensive assessment of school and district performance and therefore have credibility and meaning that simply does not exist with the current federal system.

The system also sustains and improves itself through its transparency. Through SchoolView and other public reporting requirements, educators have easy access to information that can help them improve their schools and parents have access to information that will help them ask the right questions to drive improvement of their local school or information about a nearby school that might provide better options for their child.

Through its Comprehensive Appraisals for District Improvement, School Support Teams, and Quality Program Indicators, Colorado has defined the elements of a high quality district, school, and local ESEA program. Using its onsite diagnostic reviews, CDE can determine the degree to which Colorado districts, schools, and programs measure up to those standards. The report generated following a diagnostic review begins the process of getting districts, schools, and local programs from where they

are to where they need to be to ensure students exit their systems college and career ready. To help build local capacity for this to happen, CDE provides training in support of schools and districts that would like to use the standards and indicators and rubrics to self assess for continuous improvement.

Colorado's accountability system provides incentives for high performance and supports to low performers. The primary incentives for increased performance are increased autonomy and public recognition. State and district partnerships form the basis of support for low performers. Partnerships, utilizing a performance management model, include a needs assessment, planning support, progress monitoring, as well as targeted interventions and ongoing technical assistance. The Partnerships and supports are specifically designed and delivered to build local capacity and sustainability.

Colorado's system requires all schools and districts to develop improvement plans annually, regardless of their level of performance. The improvement planning process requires schools and districts to engage in root cause analysis and to establish plans to improve in any and all areas where framework performance fell short of expectations.

Finally, Colorado's accountability system has real consequences for continued low performance. Low performing schools and districts that do not improve over time face closure or turnaround as described in the previous section.

Colorado's accountability system has growth as its foundation. The system asks students, schools, and districts to continue to improve performance. However, it is not just the entities within to the system that must continuously improve; the system itself must improve to reach its goal. Toward that end, a committee of stakeholders will be convened annually to review the components and performance of the system and make recommendations for its improvement. Colorado's system may not be perfect but, like the students it is designed to protect, Colorado's system of accountability and supports will continue to grow in what it knows and is able to do.

Florida

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

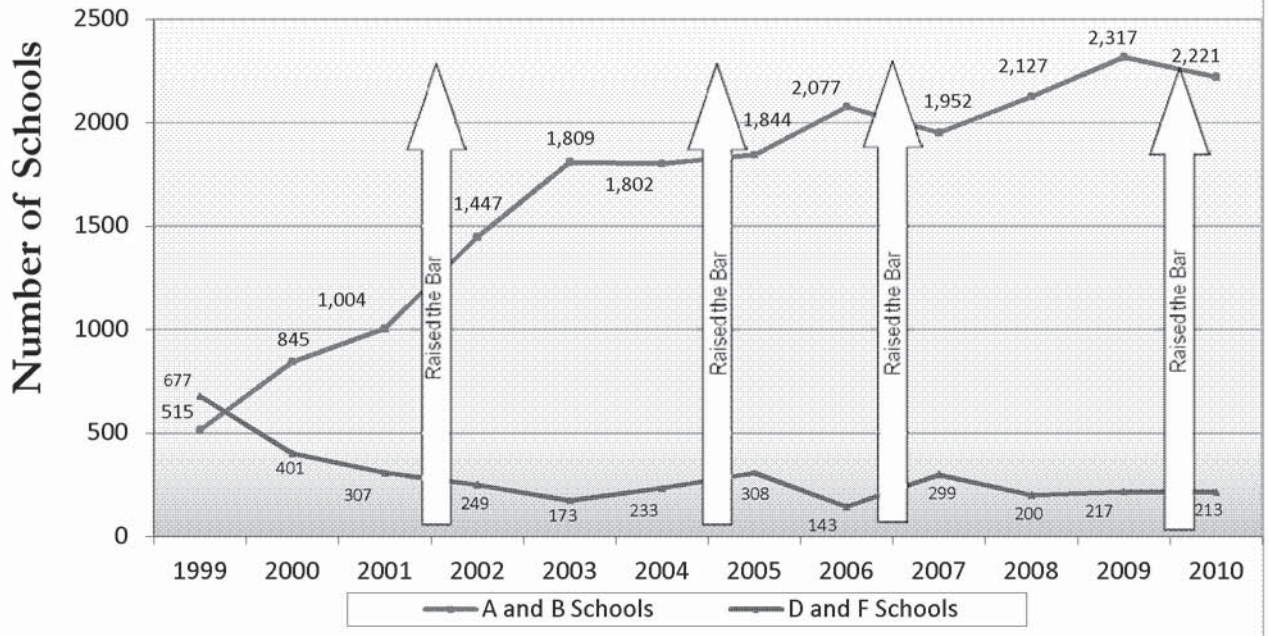
Florida's ESEA Flexibility Request is designed to eliminate the duplication and confusion caused by having two separate accountability systems and to focus schools, LEAs, communities, and the state on raising the achievement of all students. We see this effort as an opportunity to strengthen accountability and support and put in place the right conditions for schools and teachers to do their jobs most effectively.

This uniform system of accountability includes:

- Recognition of and rewards for its highest-performing and improving schools.
- Increasing levels of LEA and state support to close the achievement gap for all subgroups of students, including English language learners and students with disabilities.

Florida's accountability environment is characterized by ongoing increases in standards which have led to continuing increases in student performance across all subgroups. Florida's assessment, accountability, and teacher evaluation systems foster progress and are designed to accelerate academic improvement. Together these systems shine a bright light on the achievement gap, increase accountability for high-need students, set high academic standards, recognize and reward growth in student learning, and recognize the most effective teachers. Florida has implemented forward-looking reforms designed to raise student achievement. Each time Florida has raised its accountability standards Florida students have responded by increasing their performance to meet the challenge.

Florida Students and Schools Increased Performance Each Time Standards Were Raised
The Number of Lower-Performing Schools Has Decreased



Key for "Raising the Bar" arrows:

- *1st arrow: Florida implemented learning gains components in reading and mathematics after expanding the FCAT from three grades tested in reading and mathematics to all grades tested from grade 3 through grade 10.*
- *2nd arrow: Florida expanded the included student population to incorporate scores for students with disabilities and English language learners on the FCAT, and increased the writing standard for proficiency from 3.0 to 3.5.*
- *3rd arrow: Florida added FCAT Science to school grade performance measures and added learning gains for the lowest-performing 25% of students in mathematics.*
- *4th arrow: Florida expanded its high school grading measures to include the overall and at-risk graduation rates, accelerated coursework, and readiness for college and careers.*

Having two separate accountability systems, one federal and one state, has caused confusion among communities and stakeholders and resulted in mixed messages to schools and LEAs. This has sometimes sidetracked the hard work of moving student achievement forward by diluting schools' and LEAs' focus. Through this application, Florida proposes to move to one accountability system, an enhanced School Grades system, which will focus all accountability resources and attention on one system to move all students forward to attain college- and career-ready standards. In addition, the School Grades system will identify struggling schools in need of additional support through Florida's Differentiated Accountability (DA) system. The DA system will provide different levels of support to schools and LEAs depending on their needs. This strategy will reduce the disconnect between the federal and the state accountability systems and help communities embrace accountability for their schools in a way that is designed to provide support and raise the

achievement of all students to meet college and career expectations.

Florida's ESEA Flexibility Request will move Florida forward in strengthening and enhancing its accountability system. At the same time Florida is pursuing this flexibility with USDOE, it will pursue statutory changes with the State Legislature. Florida's Legislature has demonstrated strong support for high standards and school accountability over time. When statutory changes are made during the 2012 session, we will use this new model beginning with the 2012 school grades and use those school grades to identify Priority/Intervene and Focus/Correct schools for the 2012-13 school year.

Planned System Enhancements: Focus on Florida's Successful School Grading Approach

Florida proposes to use its School Grades system of education accountability, which has regularly increased standards and expectations since its implementation in 1999, as the consolidated and sole measure for classifying and evaluating the progress of schools in Florida's DA system of school improvement. Florida's School Grades system has effectively provided the incentives needed to significantly increase student achievement for all students, including struggling subgroups. This will simplify and strengthen (through greater stakeholder buy-in and public support) the current Florida DA classification criteria, which are described in the Florida DA matrix document posted online at http://flbsi.org/pdf/Final_2011-2012_DA_Matrix.pdf. As Florida implements the new system outlined in this proposal it will use letter grades to refer to the categories of schools needing supports and the schools to receive recognition. Ultimately the state will not use the terms Prevent, Focus/Correct and Priority/Intervene, but simply "C," "D," and "F."

School Grade	ESEA Category	DA Category
A	Reward	
Schools that increase their grade	Reward	
B		
C		Prevent
D	Focus	Correct
F	Priority	Intervene

Key Features of Florida's School Grades System

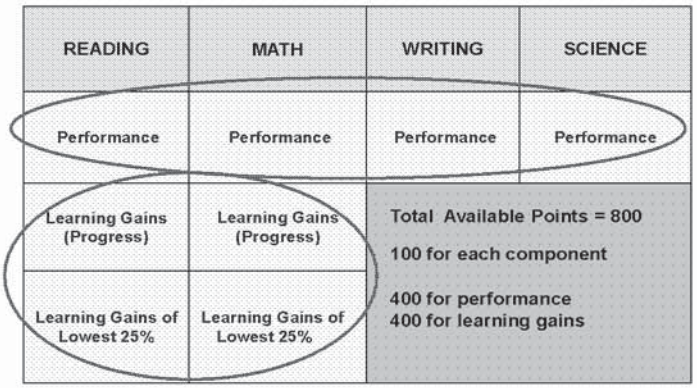
- Components based on assessments aligned with state curriculum standards.
- Progressively increasing rigor in the assessments themselves (with both comprehensive subject area examinations and end-of-course assessments set to newly operational Next Generation Sunshine State Standards) and in the application of criteria for school grading.
- Legislative support: school grading requirements codified (Section 1008.34, Florida Statutes, and Rule 6A-1.09981, Florida Administrative Code).

- A balance between student performance and student learning gains (growth).
- Points-based system that allows for a tiered (literally, graded) group of ratings (rather than a conjunctive system such as Adequate Yearly Progress (AYP), for which any missed target results in a "No progress" or "Not adequate progress" outcome for the school).
- Criterion-based system for the assessments used in determining student achievement and progress as well as for the points scale for assigning school grades, including additional requirements for participation in testing ("percent-tested" criterion) and progress of the lowest-performing students.
- Provides an incentive for schools to focus on improving the lowest-performing 25% of students.
- Florida's School Grades system is applied to all schools including charter schools.
- Documented significant improvement in student performance following raised standards over time.

Assessment-Based Components

For elementary and middle school grades through 2010-11, the school grade has been based solely on students' performance and progress measured by the statewide Florida Comprehensive Assessment Test (FCAT). For Florida's high school grading system, the state assessment-based components are weighted at 50% of the high school grade, while the other 50% of the available school grade points are weighted toward component areas that directly measure, or are otherwise essential to, career and college readiness: on-time graduation, participation and performance in advanced curricula (including Industry Certifications), and postsecondary readiness in reading and mathematics. These additional components for measuring high school performance were implemented beginning in 2009-10 to provide a more comprehensive measure of high schools' effectiveness in preparing students for success at the next level after graduation.

Florida School Grades Overview – Assessment Components



- Achievement on statewide assessments – Comprises 50% of the assessment component:
  - The percent of all students scoring 3 or above on FCAT reading, mathematics, writing, and science.
  - Points earned = percent of students meeting standards in each subject.
  - Performance at or above grade level in reading, mathematics, and science (level 3 or higher

on a range of 1 to 5); and writing performance at or above a score of 4 on a range of 1 to 6.

- Progress/Learning Gains on statewide assessments – Comprises the second 50% of the assessment component:
  - The percent of students learning a year's worth of knowledge in reading and mathematics, regardless of whether they are on grade level.
  - The percent of the lowest-performing 25% of students who are making a year's worth of progress in reading and mathematics.
  - Three ways to make learning gains for all students and the lowest-performing 25% of students:
    - Move up by one or more Achievement Levels.
    - Maintain an Achievement Level (remain at level 3, 4, or 5).
    - Increase performance within levels 1 and 2 to move the student toward satisfactory performance (i.e., more than a year's growth).
  - Florida's lowest-performing 25% of students contains an over representation of the subgroups that are historically low-performing (see page 92). Using the lowest-performing 25% solves one of the main difficulties of using the performance of individual subgroups in accountability systems. When looking at individual subgroups many schools do not have enough students in each subgroup for each subgroup's performance to count in the accountability system. This may lead schools to focus on those subgroups that do make a difference to their accountability rating instead of all students that are performing at low levels. By bringing the subgroups together into the lowest-performing 25%, Florida schools and LEAs will focus on the students most in need of assistance.

The following charts illustrate how points are assigned in the School Grades calculation and the proportion of the total points that each cell represents.

Current Elementary and Middle School Grades Model

Reading	Mathematics	Writing	Science
Performance			
FCAT 2.0 (100) 12.5%	FCAT 2.0 (100) 12.5%	FCAT (100) 12.5%	FCAT (100) 12.5%
Learning Gains: All Students			
FCAT 2.0 (100) 12.5%	FCAT 2.0 (100) 12.5%		
Lowest-Performing 25% Learning Gains			
FCAT 2.0 (100) 12.5%	FCAT 2.0 (100) 12.5%		
(300) 37.5%	(300) 37.5%	(100) 12.5%	(100) 12.5%

Current High School Grades Model						
Reading	**Mathematics**	**Writing**	**Science**	**Acceleration**	**Graduation Rate**	**College Readiness**
Performance (100) 6.25%	Performance (100) 6.25%	Performance (100) 6.25%	Performance (100) 6.25%	Participation (175) 10.94%	Overall (200) 12.5%	Reading (100) 6.25%
Learning Gains (100) 6.25%	Learning Gains (100) 6.25%			Performance (125) 7.18%	At-Risk (100) 6.25%	Math (100) 6.25%
Lowest-performing 25% Gains (100) 6.25%	Lowest-performing 25% Gains (100) 6.25%					
300 points 18.75%	300 points 18.75%	100 points 6.25%	100 points 6.25%	300 points 18.75%	300 points 18.75%	200 points 12.5%

Increasing Rigor of Assessments

In addition to increasing the rigor of its own subject area assessments, Florida proposes to provide LEAs with the flexibility to count in performance, learning gains, and participation calculations the assessment results of students tested on accelerated exams (for instance, a grade 8 student who tests on the Algebra 1 end-of-course exam in mathematics) and to give LEAs the opportunity to waive the requirement to test students on both examinations if the student tests on an exam that is more rigorous than the comprehensive examination (FCAT 2.0).

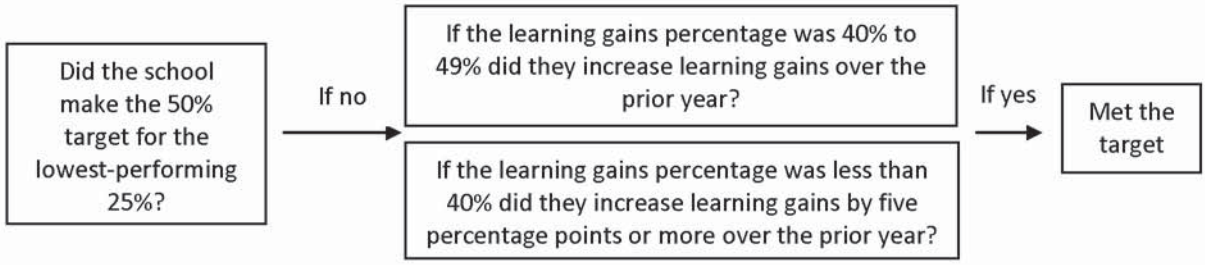
This flexibility would apply to the following types of state or national examinations:

- Algebra 1 end-of-course exam vs. FCAT 2.0 Mathematics at grade levels 6, 7, or 8.
- Biology 1 end-of-course exam vs. FCAT 2.0 Science at grade 8.
- AP Biology credit (for scores of 3 and above) could be used to meet the passing score requirement on the Biology 1 end-of-course exam as graduation requirement.

Additional Requirements

- Adequate Progress Requirement for lowest-performing 25% of students in reading and mathematics.
    - At least 50% of the low performers must show FCAT-measured learning gains in reading and mathematics, or the school must show required annual improvement in that percentage. If the school does not meet this requirement the school's grade is reduced by one letter grade. Please see the illustration below.

Learning Gains for the Lowest-Performing 25% of Students



- "Percent Tested" Requirement.
  - 90% of students must be tested in order for the school to receive a regular grade in lieu of an "Incomplete."
  - 95% must be tested for a school to be eligible for an "A."

School Grade Scale and Requirements

	A	B	C	D	F
School Grade Points*	525 or more	495-524	435-494	395-434	Less than 395
Percent of Eligible Students Tested	At least 95%	At least 90%	At least 90%	At least 90%	Less than 90%
Required Learning Gains with Lowest-Performing Students in Reading and Math	In the current year	In the current year or between the prior and current year	In the current year or between the prior and current year		

** Beginning in 2011-12, if at least 75% of elementary, middle, or high schools statewide earn an "A" or "B," the school grade point scale will increase by 5% for that school type statewide in the following year increasing the rigor of the system.*

Florida's High School Grades Also Include Components Related to Students' Ability to Progress on to Postsecondary Education

Starting in 2010, Florida's high school grades calculation includes other factors in addition to student performance and learning gains. These other factors are related to a student's ability to be successful in college including the following measures:

- Graduation rates for all students.
- Graduation rates for "at-risk" students. "At-risk" students are those who entered high school below grade level in reading and mathematics (based on Grade 8 FCAT results).
- Accelerated curricula (both performance and participation), which includes AP, IB, AICE, Dual Enrollment, and Industry Certification exams and courses.
- College readiness rates based upon SAT, ACT, or common placement test results.

Florida's high school grading system is required by state law to evenly balance the weighting on state-based assessment measures with measures relating to on-time graduation, accelerated curricula, and readiness for college (see Section 2.A.ii.).

Florida's High School Grades Evenly Weight Assessment and Other Factors

Florida High School Grades

50% Based on Statewide Assessments	50% Based on Other Factors
• Performance in reading, mathematics, science, and writing • Learning gains for all students in reading and mathematics • Learning gains for the lowest 25% in reading and mathematics	• Overall graduation rate • At-risk graduation rate • Participation and performance in accelerated courses • College readiness in reading and mathematics • Growth or decline of these measures

Upcoming Changes to School Grades

Florida is in the process of making revisions to its School Grades system to address statutorily required changes, include new more rigorous assessment standards, and improve the school grading methodology. These changes will again raise the bar for Florida's students, teachers, and schools and are being pursued with advice and recommendations from LEA assessment and accountability directors as well as superintendents.

- Florida's middle school grading formula will be modified to include points for students that participate in and pass high school end-of-course assessments while in middle school, including Algebra 1, Geometry, and Biology.
- The methodology will change at the high school level to include student performance and learning gains for end-of-course assessments.
- Florida is also pursuing changes to the school grading formula to improve the methodology.
- Once new cut scores have been set and other changes to school grading has been finalized, Florida will review its current school grading scale to see if it needs revision.

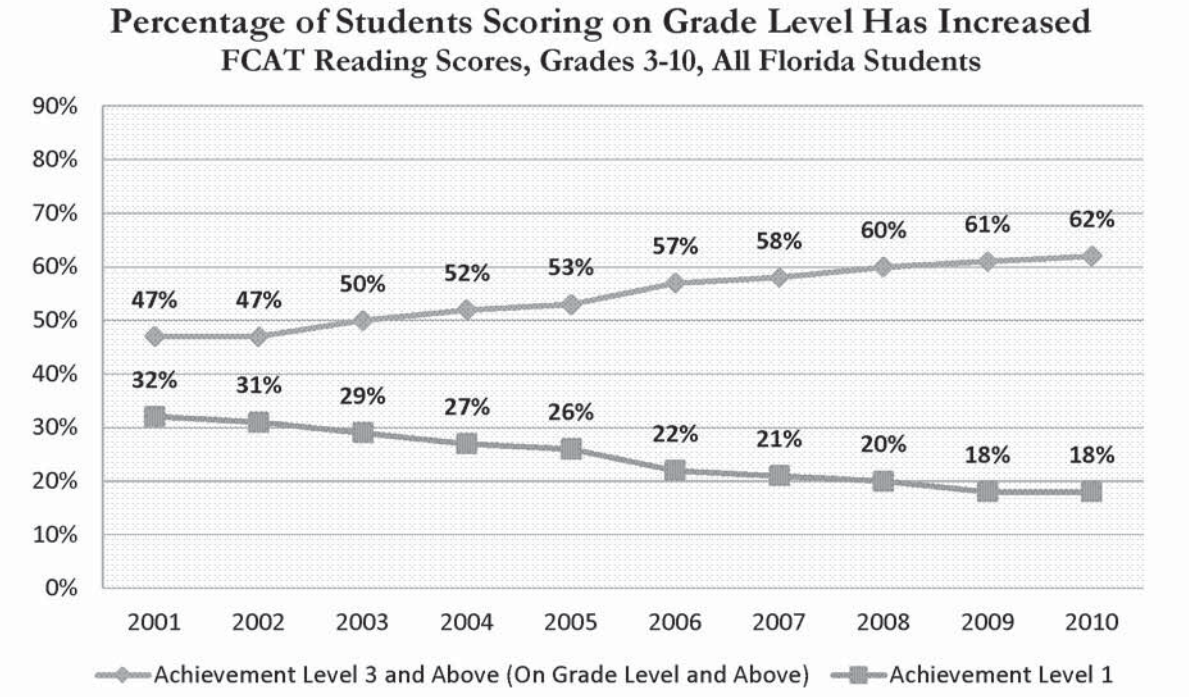
School Grades Information Resources

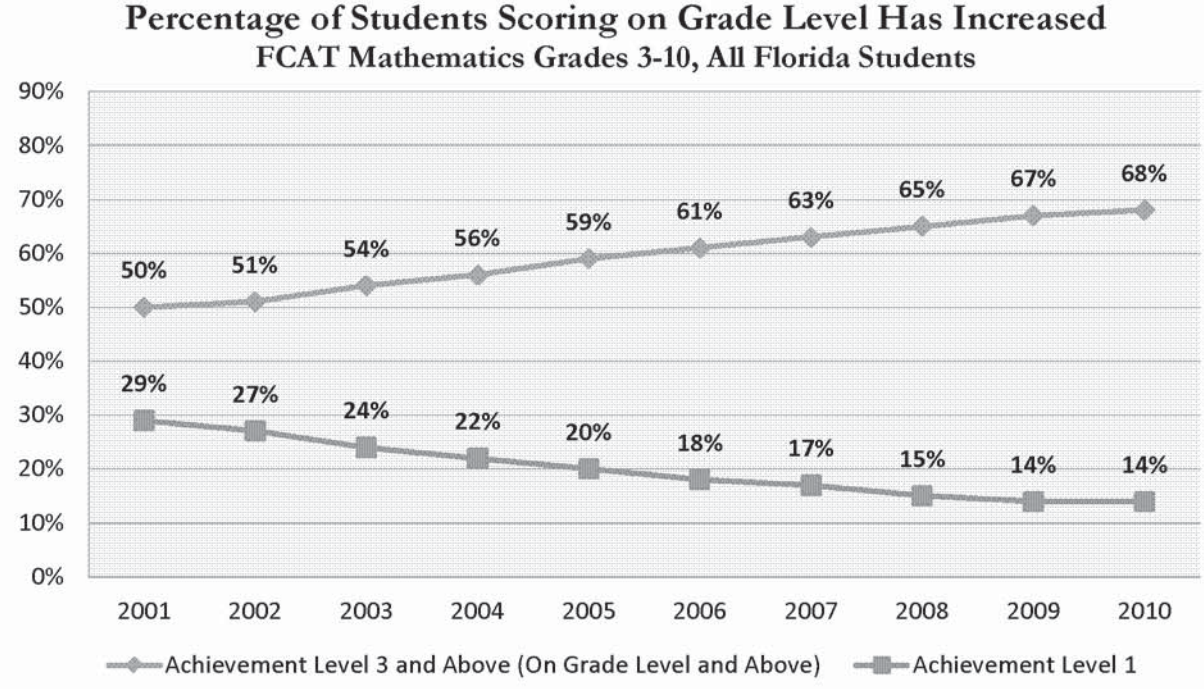
- Florida School Grades downloadable files for most recent school year and information resources: http://schoolgrades.fldoe.org/.
- School Grades overview (quick reference guide): http://schoolgrades.fldoe.org/pdf/1011/Guidesheet2011SchoolGrades.pdf.
- School Grades technical guide: http://schoolgrades.fldoe.org/pdf/1011/SchoolGradesTAP2011.pdf.
- School Grades files and resources archive: http://schoolgrades.fldoe.org/reports/index.asp.

Florida School Grades' Impact on Educational Achievement

Florida's School Grades system has been successful in providing incentives for students, teachers, schools, and LEAs to work diligently to meet higher standards and improve student achievement and learning gains. This is illustrated both through increases in the performance of all students and specifically, increases in the performance of Florida's subgroups. Florida's FCAT results demonstrate how Florida's students have significantly increased their performance on state standards both overall and for individual subgroups. In addition, Florida's National Assessment of Education Progress (NAEP) results highlight Florida's success in closing achievement gaps. Significantly more students are scoring at levels 3 and above now on FCAT than when school grading began. In addition to student achievement, Florida's high school grading formula also provides an emphasis on increasing the percentage of on-time graduates and the students who take rigorous college-level courses, and both of those rates have increased over time.

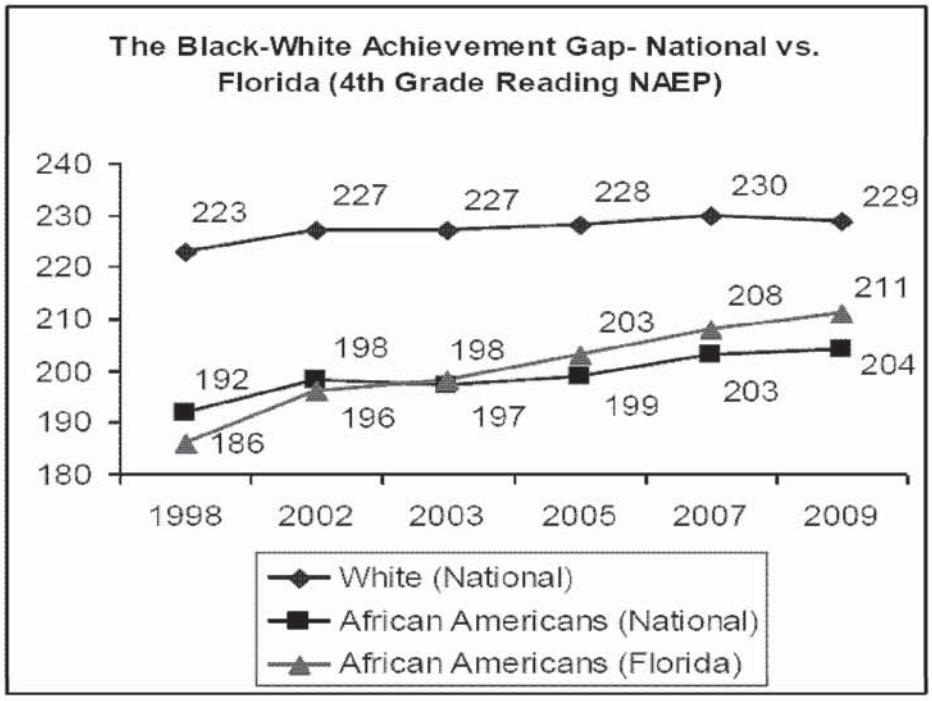
This section provides charts that depict Florida's increasing student achievement over time. The first charts show how the School Grades system has provided incentives to increase the performance of all of Florida's students over time. Then, the NAEP charts illustrate how Florida's subgroups have been successful at narrowing achievement. Next, the charts will provide information on how Florida's subgroups have increased performance over time on the FCAT which measures students' attainment of the state curriculum standards. Finally, we provide charts that show how Florida's students are taking more rigorous college-level courses and are also increasing the rate at which they graduate on-time. Florida's School Grades system has provided incentives for this improvement and has provided the means for LEAs and communities to work together toward increased achievement for their students. The percentage of students scoring at satisfactory levels and above has increased significantly while the percentage of students scoring at the lowest Achievement Level has decreased steadily in both reading and mathematics.

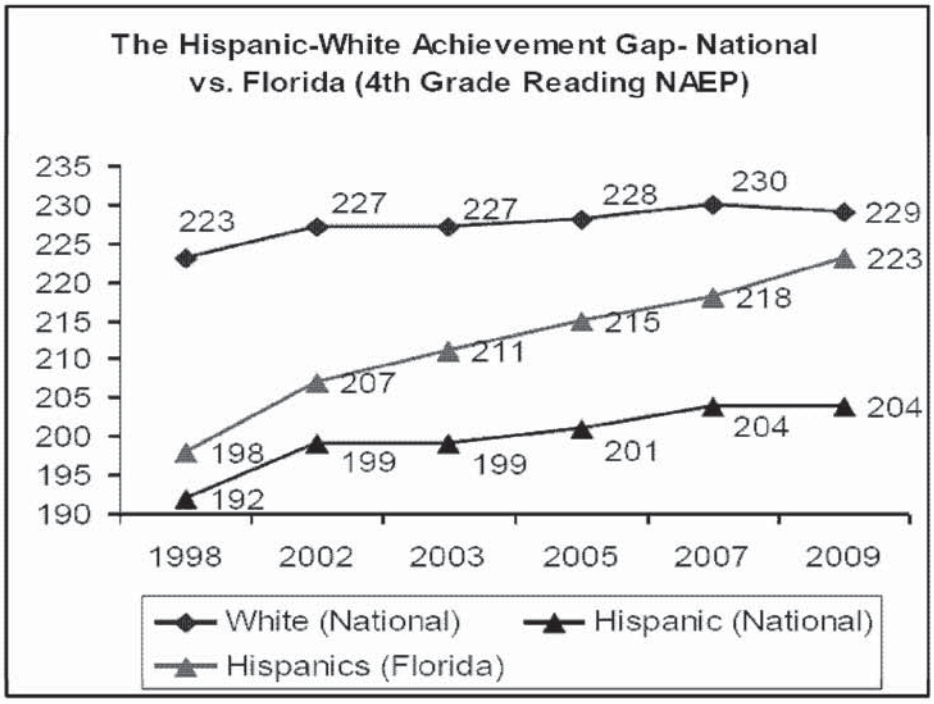




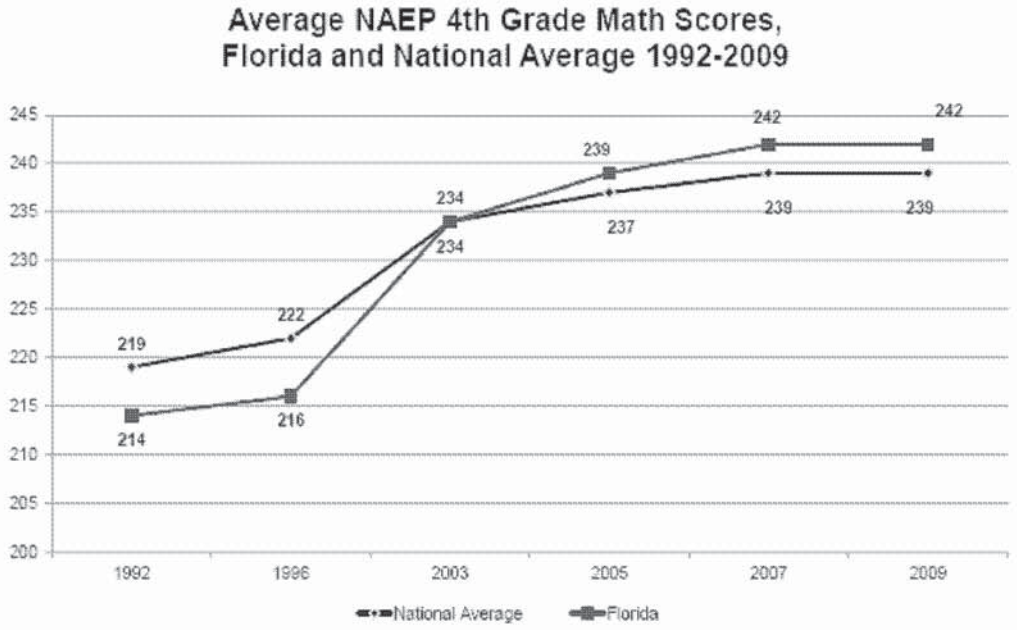
Florida's historical NAEP results support the effectiveness of Florida's School Grades system for elementary and middle school grades in reading and mathematics, with notable success in reducing achievement gaps for Florida's minority students.

Florida has Reduced the Black-White and Hispanic-White Achievement Gaps

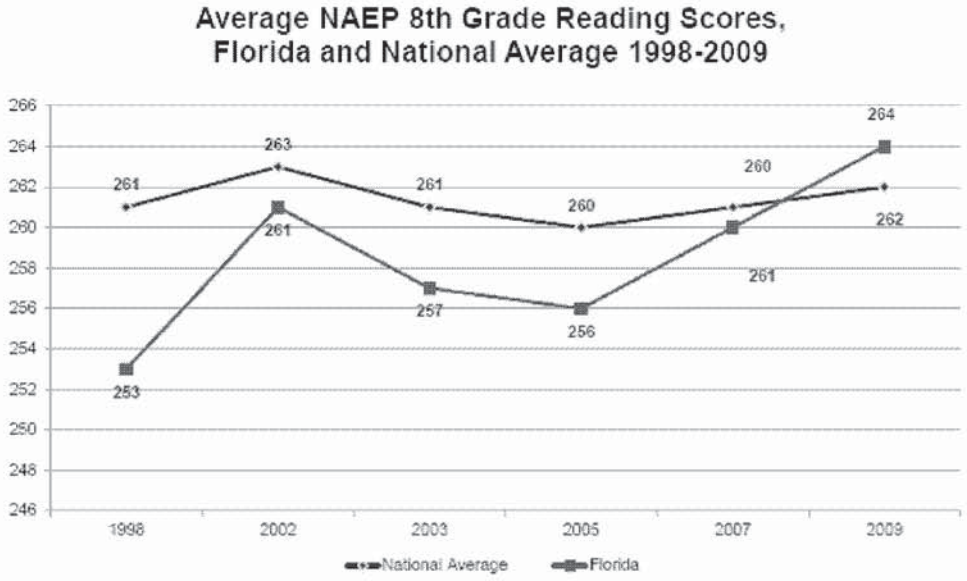




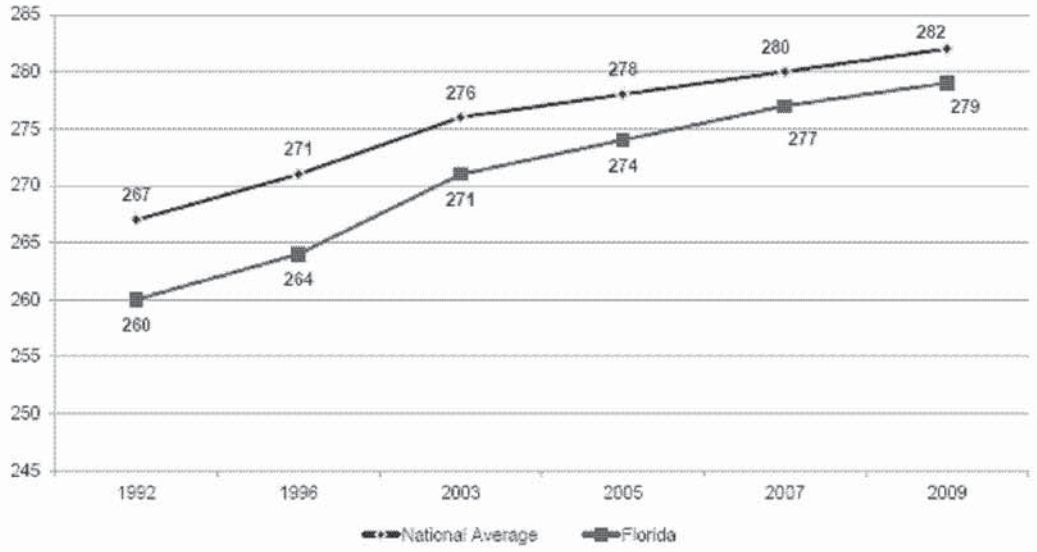
Florida has Outpaced the Nation in Mathematics Achievement



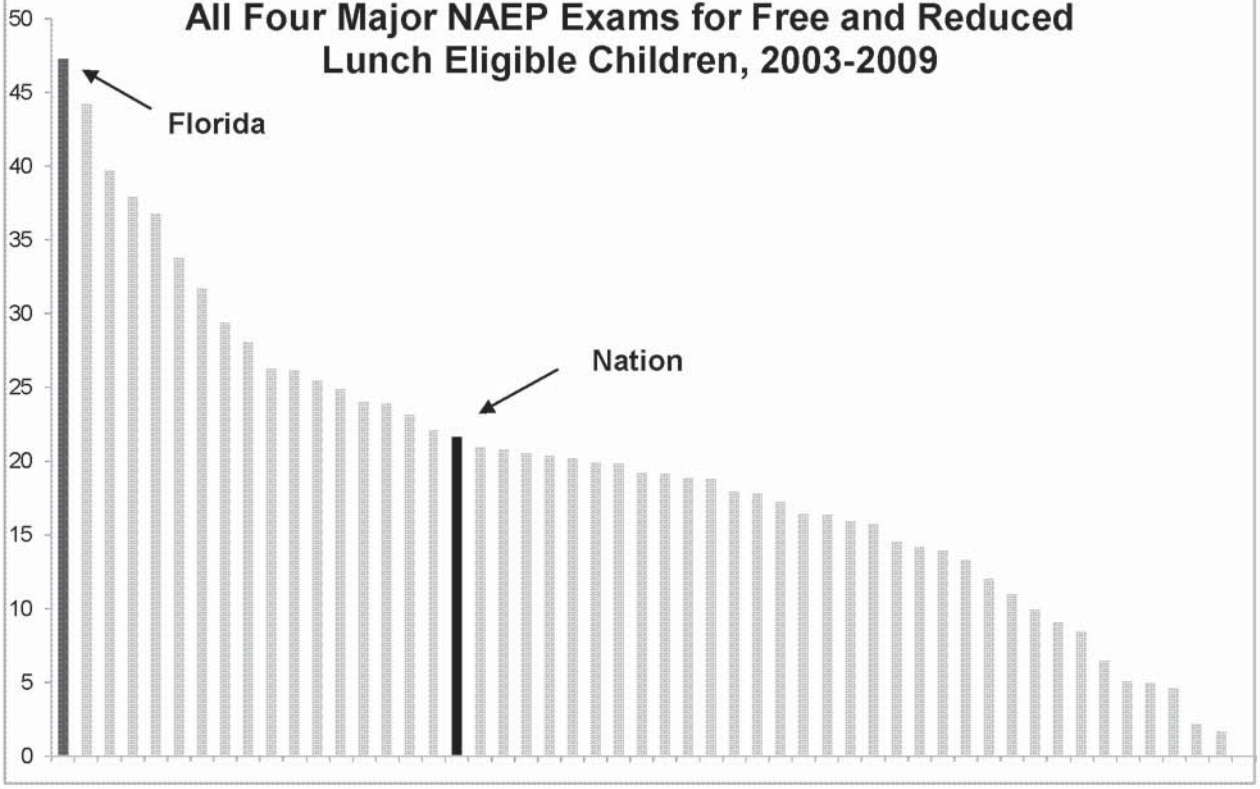
Florida has Increased Reading Scores

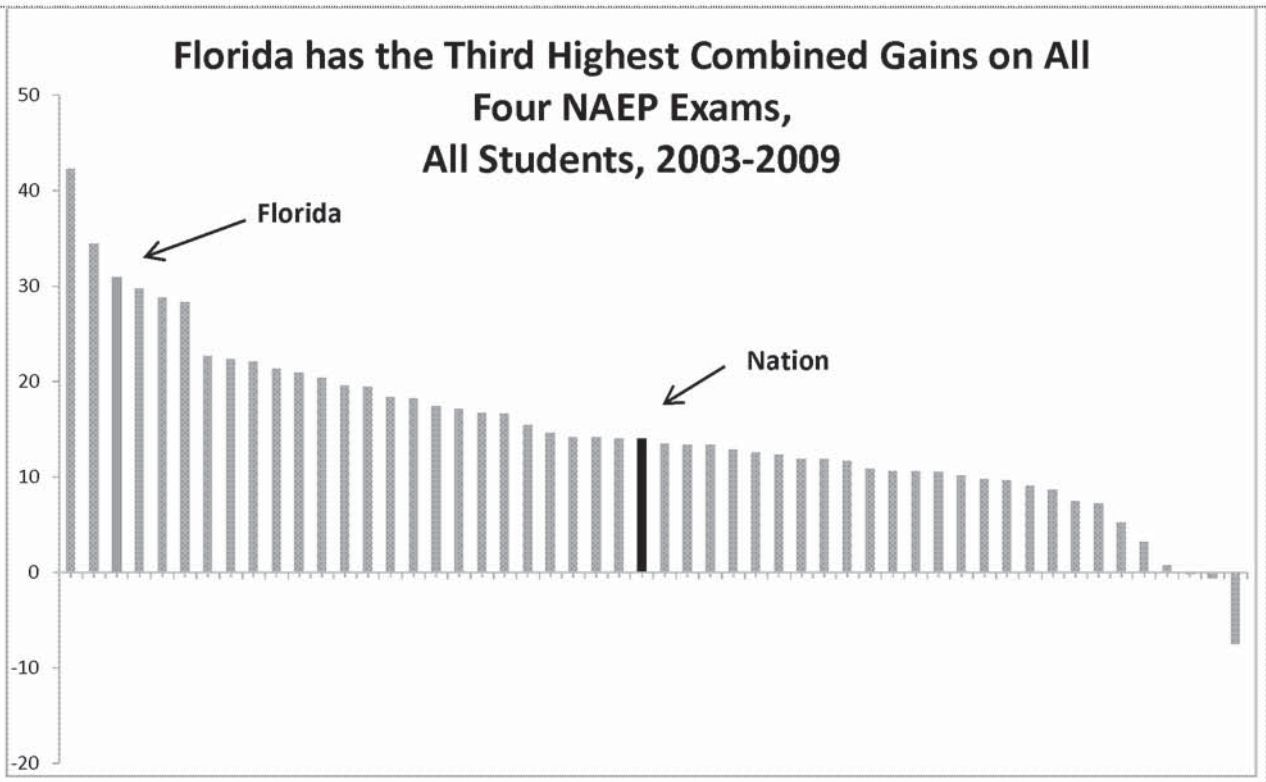


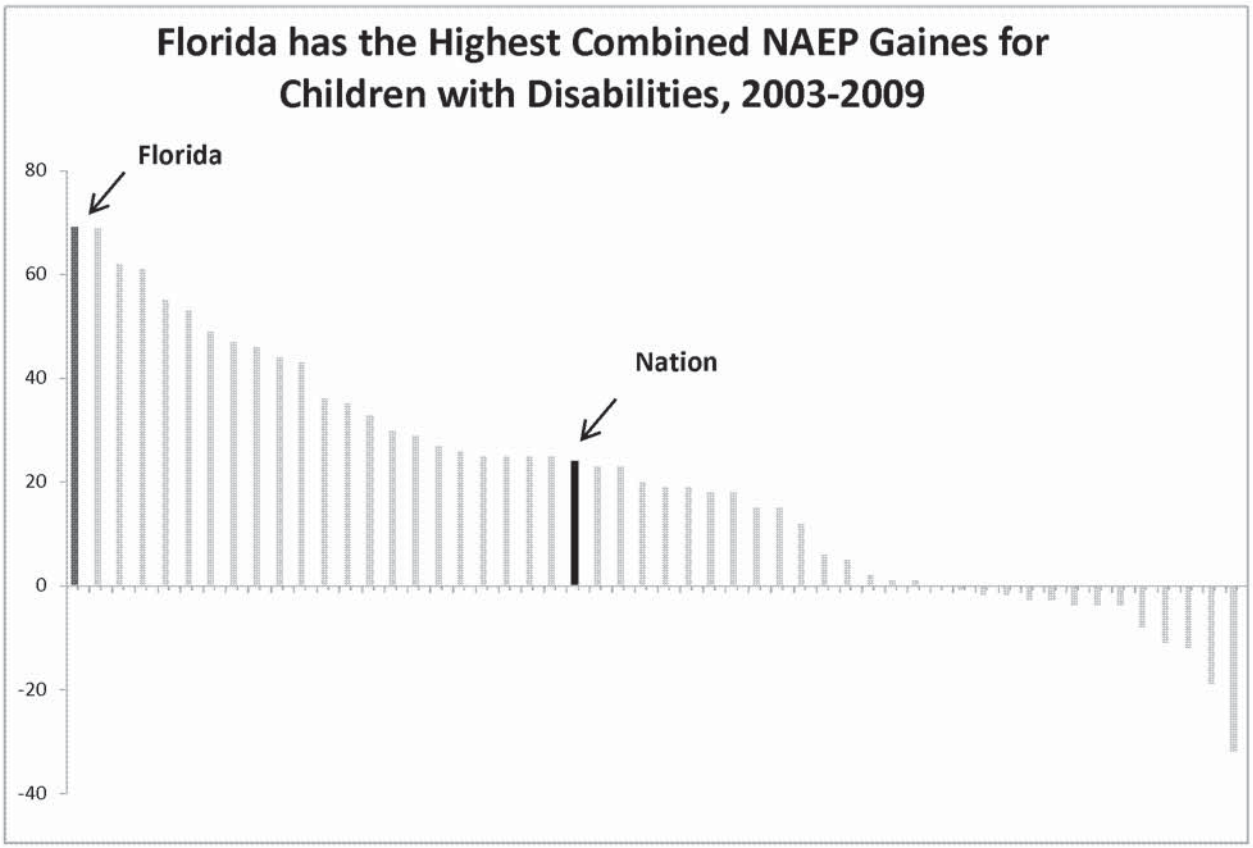
Average NAEP 8th Grade Math Scores, Florida and National Average 1992-2009

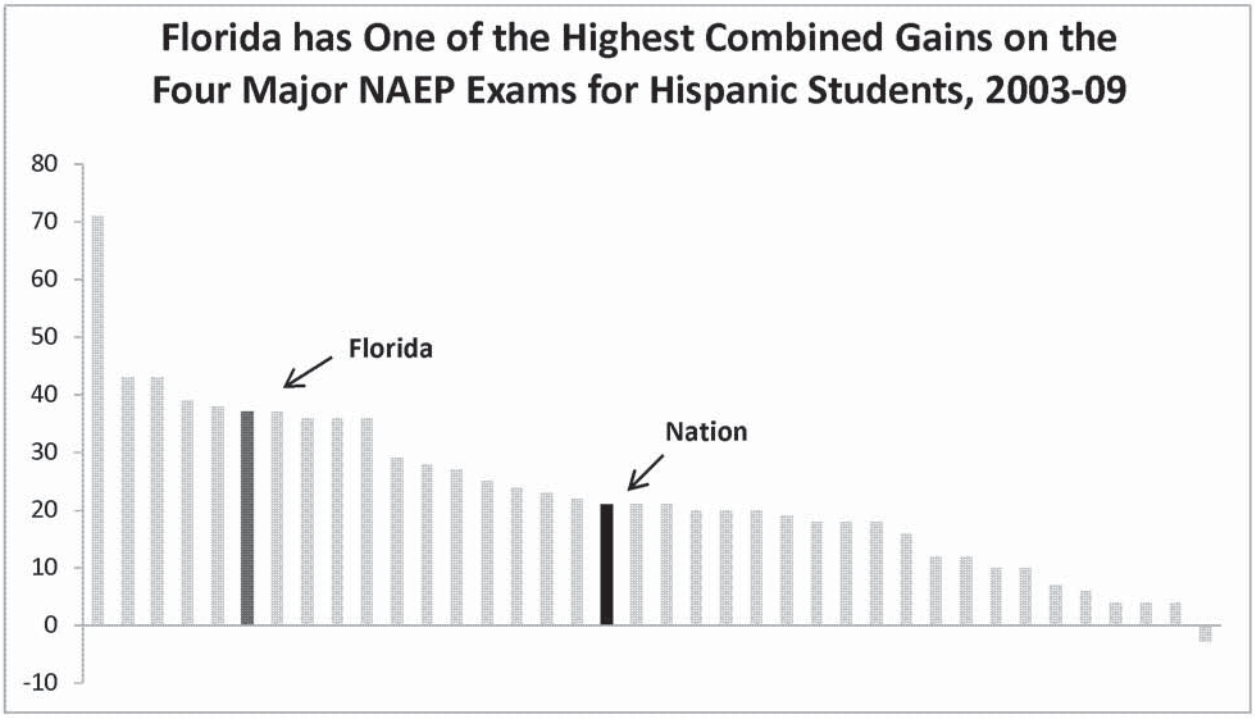


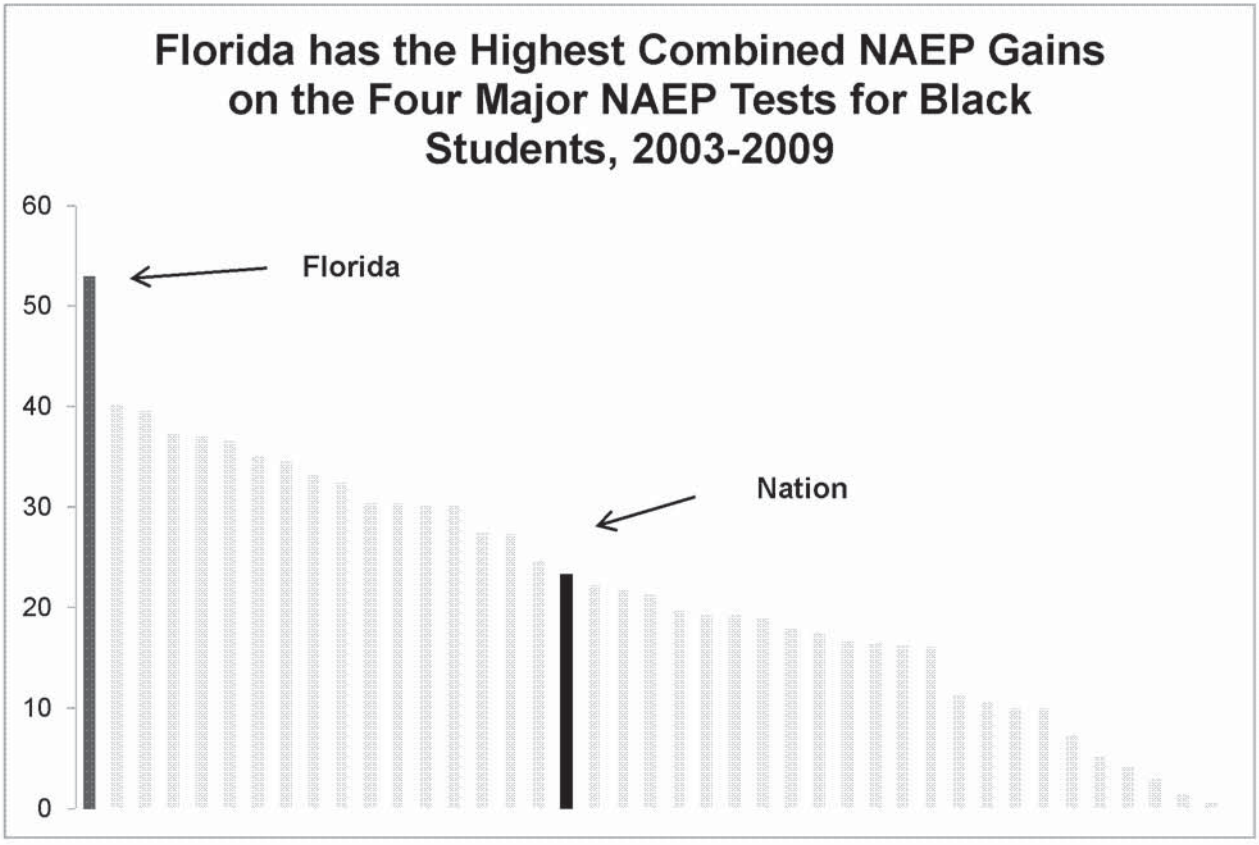
Florida has the Highest Nationally Combined Gains for All Four Major NAEP Exams for Free and Reduced Lunch Eligible Children, 2003-2009




Florida has the Third Highest Combined Gains on All Four NAEP Exams, All Students, 2003-2009
50
40
30
20
10
0
-10
-20
Florida
Nation

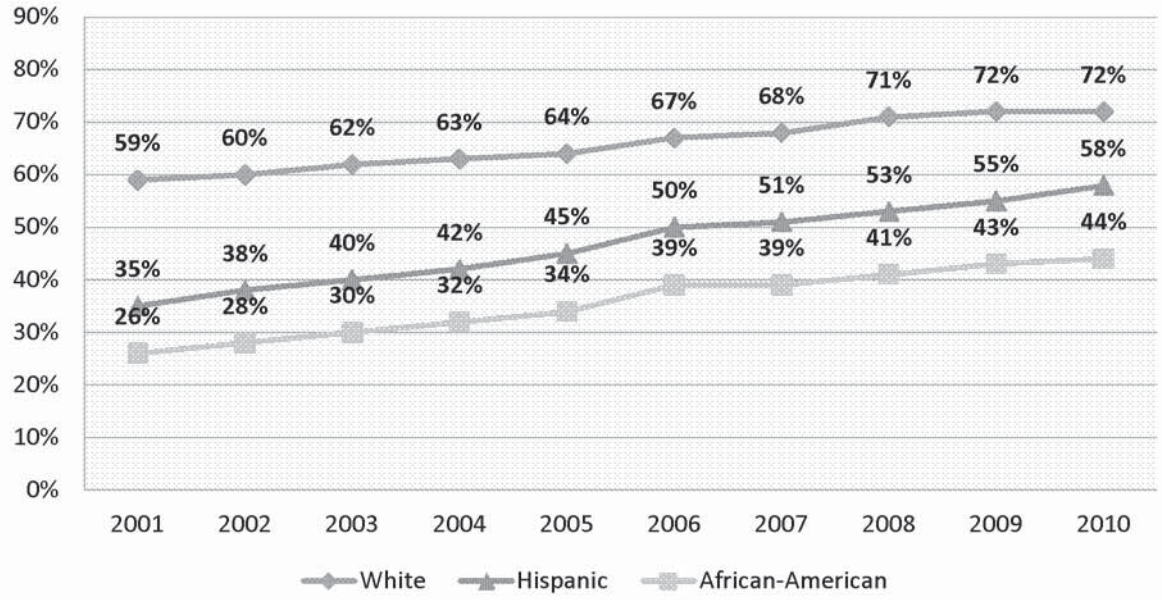

Florida has the Highest Combined NAEP Gaines for Children with Disabilities, 2003-2009
80
60
40
20
0
-20
-40
Florida
Nation


Florida has One of the Highest Combined Gains on the Four Major NAEP Exams for Hispanic Students, 2003-09
80
70
60
50
40
30
20
10
0
-10
Florida
Nation

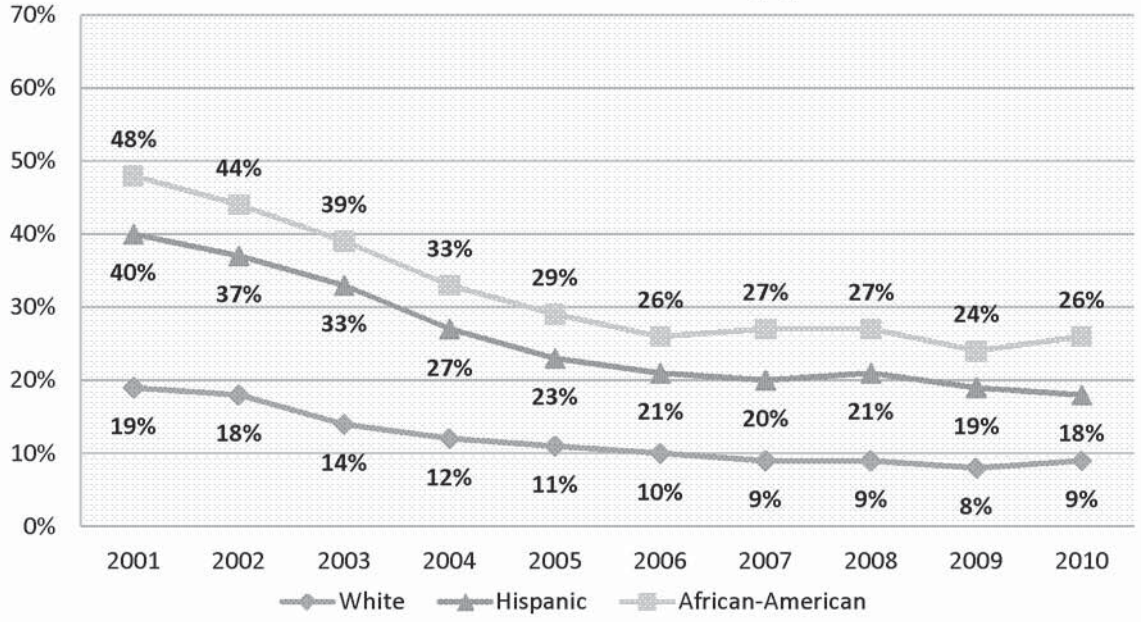

Florida has the Highest Combined NAEP Gains on the Four Major NAEP Tests for Black Students, 2003-2009
60
50
40
30
20
10
0
Florida
Nation

In addition, Florida's state accountability system provides incentives to increase the performance of the lowest-performing 25% of students, thus reducing subgroup achievement gaps. Florida has significantly reduced the percentage of students performing at the lowest Achievement Level, level 1. Florida's FCAT performance also shows that it has significantly reduced the achievement gap among subgroups.

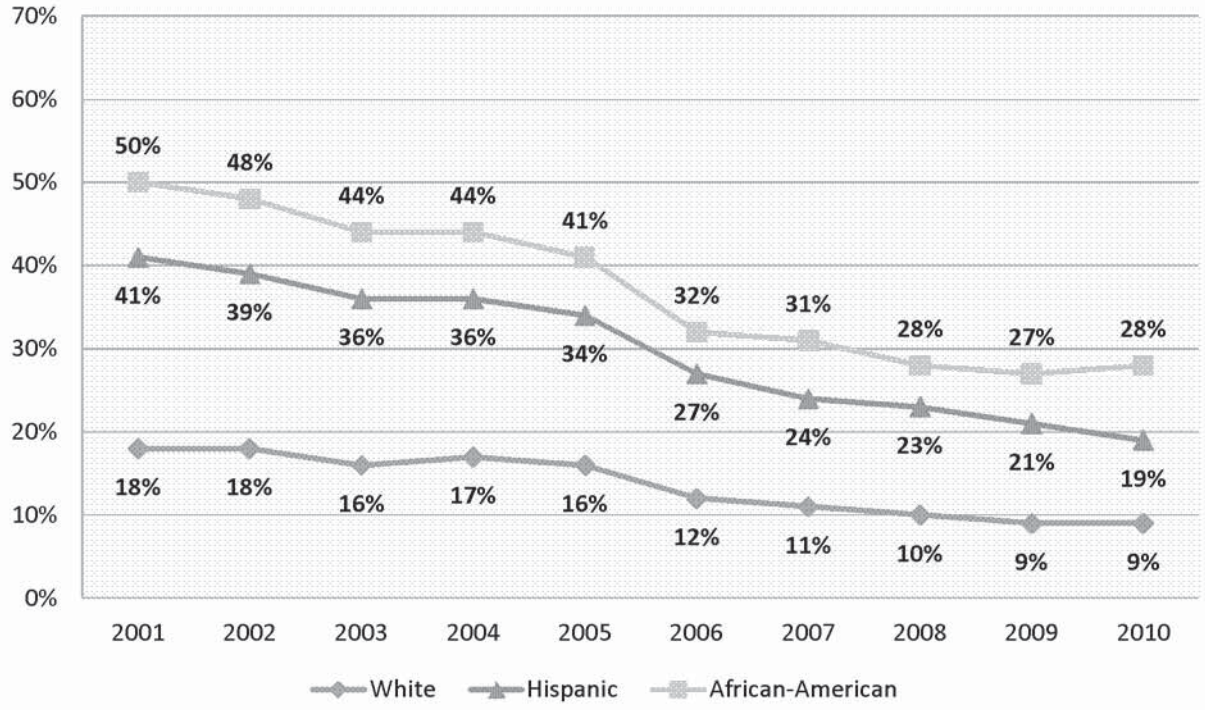
Percentage of Students Scoring on Grade Level Has Increased for Subgroups
FCAT Reading, Percent Scoring at Level 3 and Above, Grades 3-10



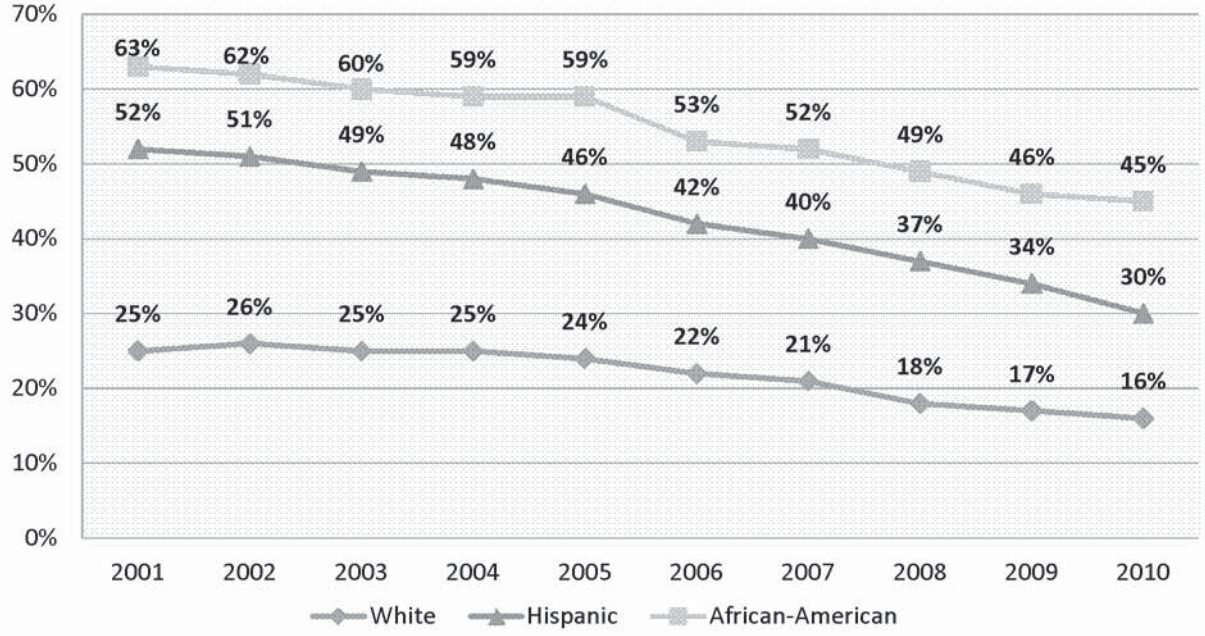
Closing the Gap for Subgroups
FCAT Reading
Achievement Level 1 - Grades 3, 4, and 5



Closing the Gap for Subgroups
FCAT Reading
Achievement Level 1 - Grades 6, 7, and 8

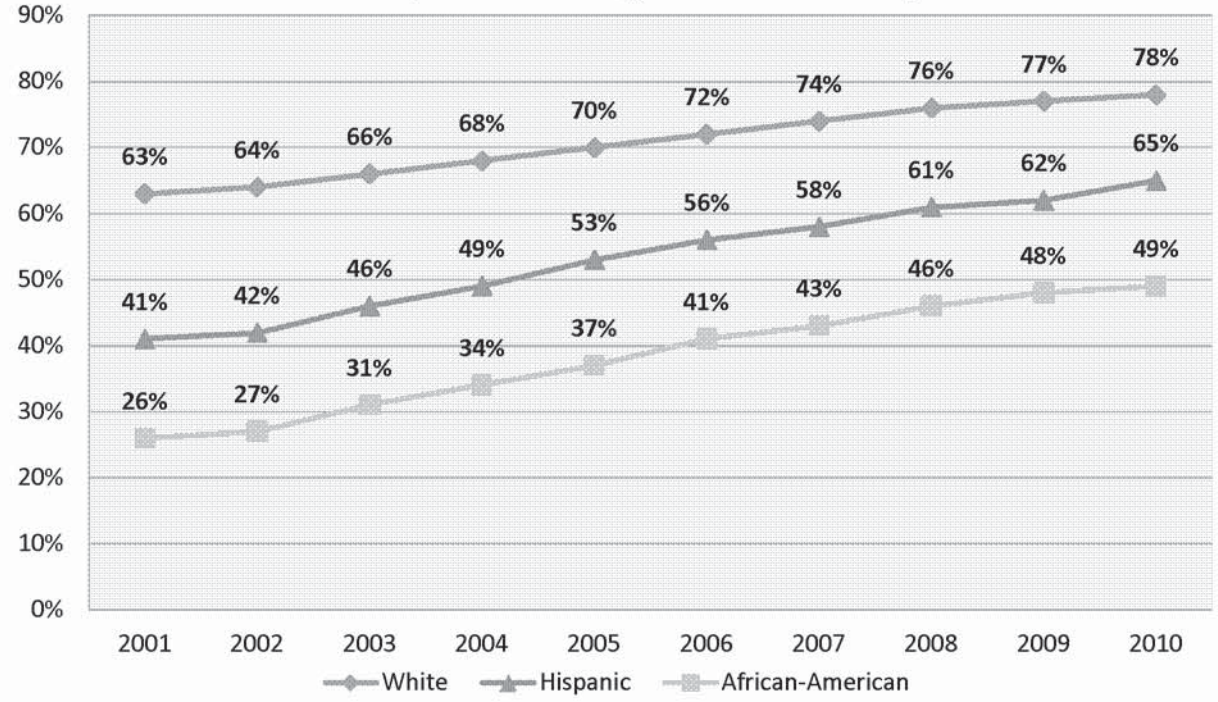


Closing the Gap for Subgroups
FCAT Reading
Achievement Level 1 - Grades 9 and 10



Percentage of Students Scoring on Grade Level Has Increased for Subgroups

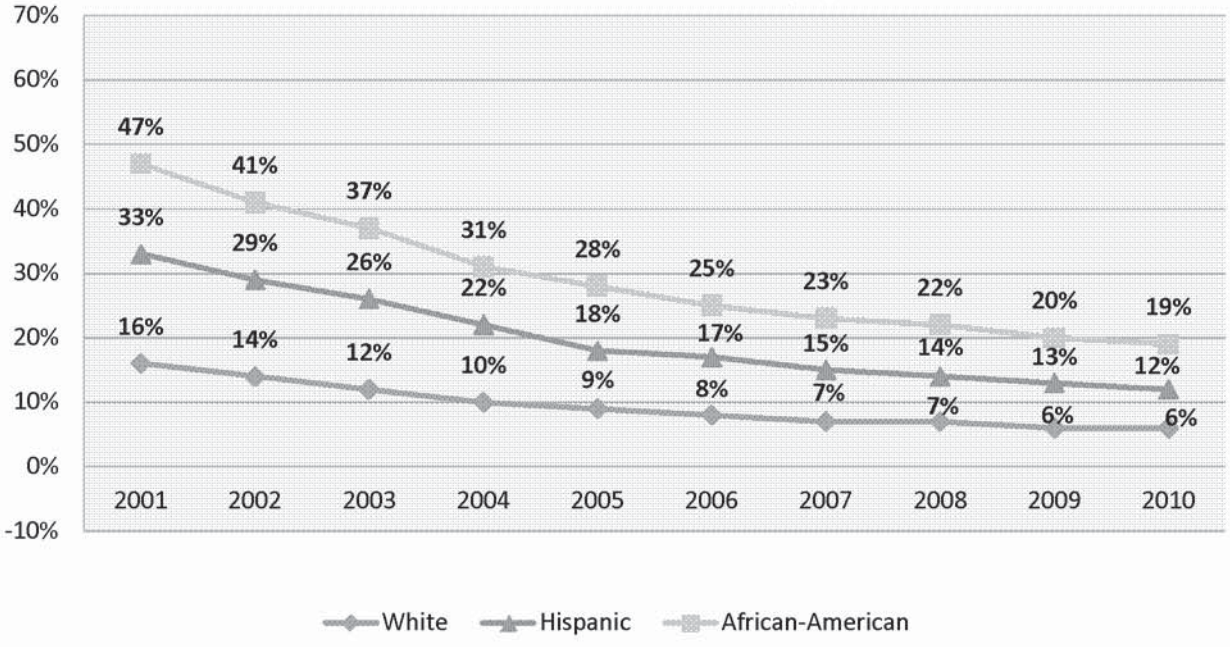
FCAT Mathematics, Percent Scoring at Level 3 or Above, Grades 3-10



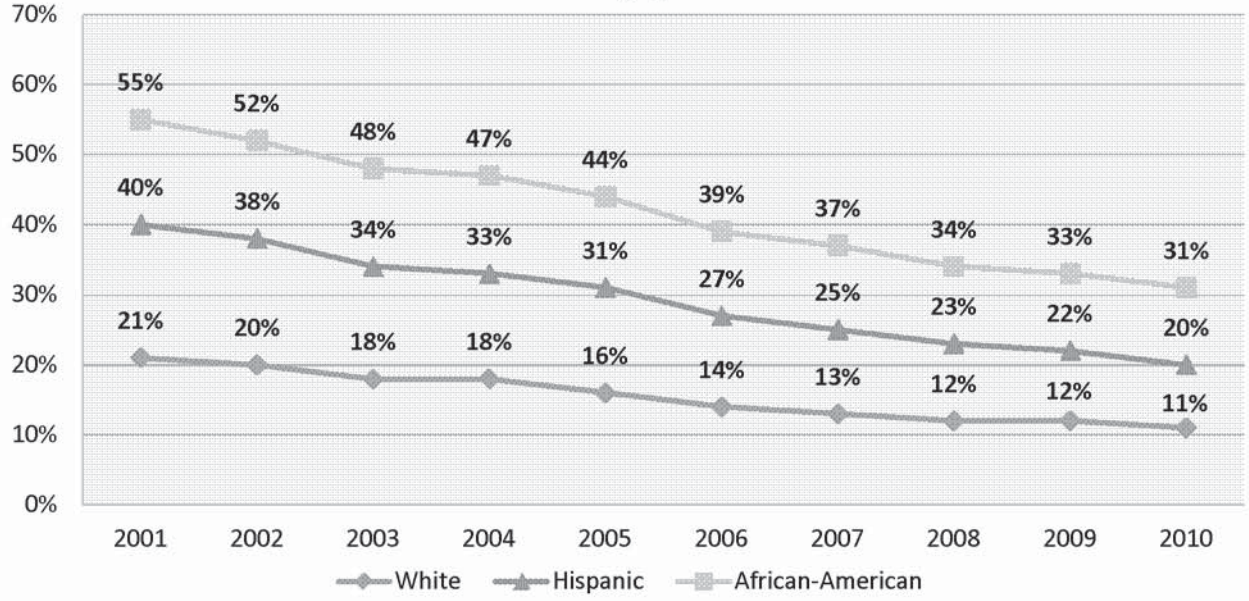
Closing the Gap for Subgroups

FCAT Mathematics

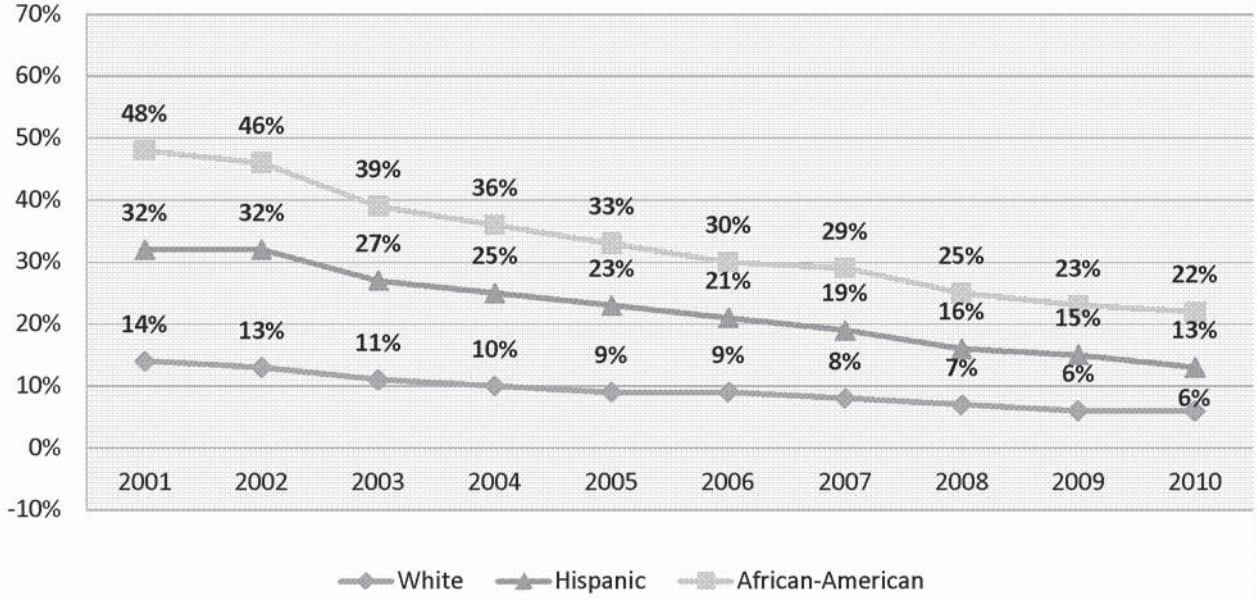
Achievement Level 1 - Grades 3, 4, and 5



Closing the Gap for Subgroups
FCAT Mathematics
Achievement Level 1
Grades 6, 7, and 8



Closing the Gap for Subgroups
FCAT Mathematics
Achievement Level 1
Grades 9 and 10



Improved Achievement for English Language Learners (ELLs), Students with Disabilities, and Students Receiving Free or Reduced Price Lunch

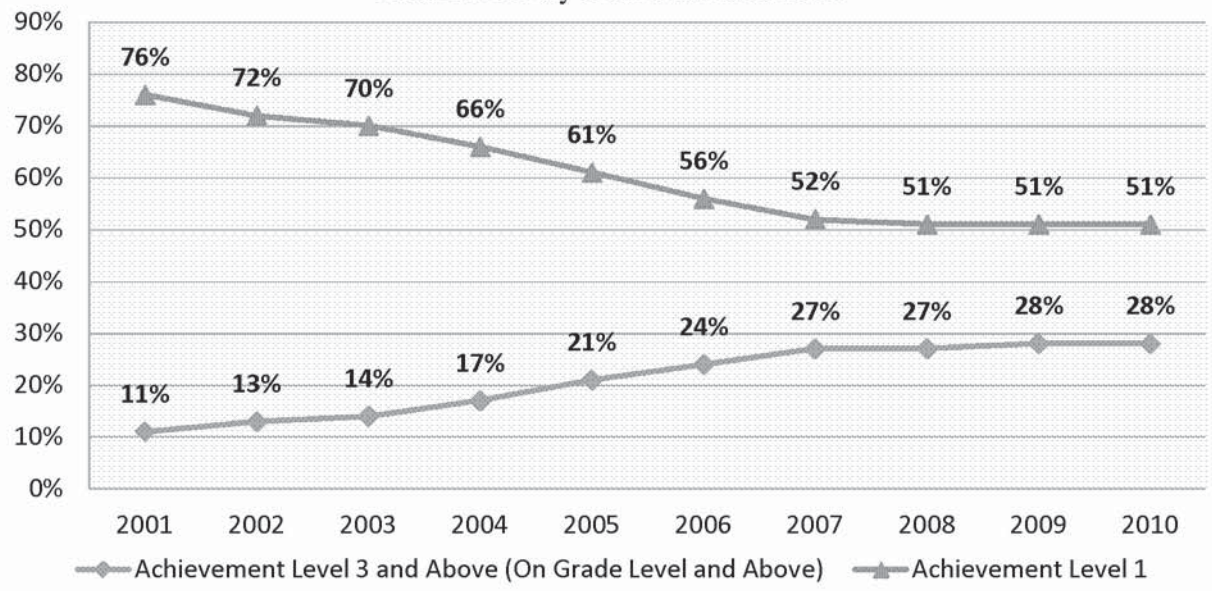
Florida's accountability system focuses schools and LEAs on working with students who perform in the bottom quartile and helps to ensure that these students are moving toward levels 3 and above. The bottom quartile includes a higher proportion of English language learners, students with disabilities, and students who receive free or reduced price lunch. As illustrated in the following charts, performance has improved significantly for such students. In addition, the state has other strategies focused on increasing the performance of these subgroups.

- The SEA's State Performance Plan (SPP), as required by the federal Office of Special Education Programs, is one way that the SEA tracks LEA performance across key indicators related to outcomes for students with disabilities. Based on LEA performance, technical assistance is provided through the Bureau of Exceptional Education and Student Services (BEESS). Discretionary projects funded by BEESS provide professional development and support to LEAs and schools linked to the SPP indicators and LEA performance.
- All primary Language Arts teachers, including ESE teachers, must become ESOL endorsed, which requires completion of 300 ESOL inservice training hours.
- Every LEA has a plan outlining strategies and interventions available for English language learners (ELLs) and students with disabilities. Additionally, each ELL student has an ELL student plan.
- ELL committees, composed of a student's ESOL teacher(s), home language teacher (if any), administrator or designee, plus guidance counselors, social workers, school psychologists, or other educators as appropriate, are formed to support ELL students. Parents must be invited to attend any committee meetings.
- All ELLs, including those with disabilities, are required to be assessed annually with the Comprehensive English Language Learning Assessment (CELLA), which measures progress of ELL proficiency in English. Accommodations are based upon Individual Educational Plan documentation.
- When a student is approved to exit ESOL, they are monitored at regular intervals for up to two years, per State Board of Education rule.

English Language Learners Have Increased Their Performance

FCAT Reading

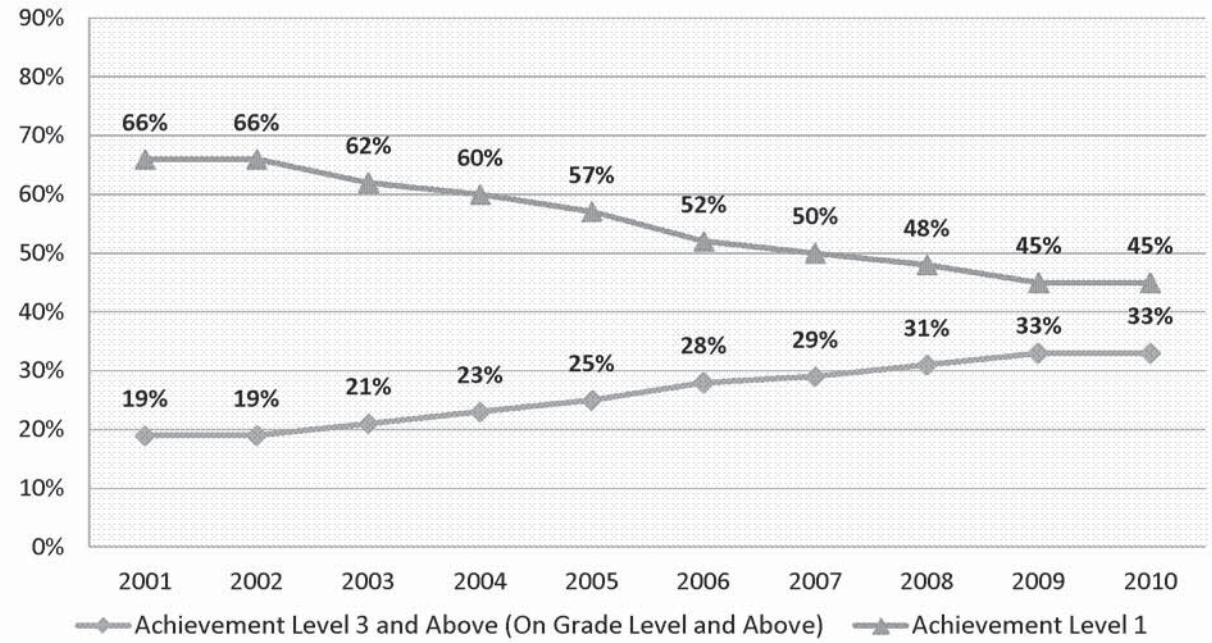
Grades 3-10 by Achievement Level



Students with Disabilities Have Increased Their Performance

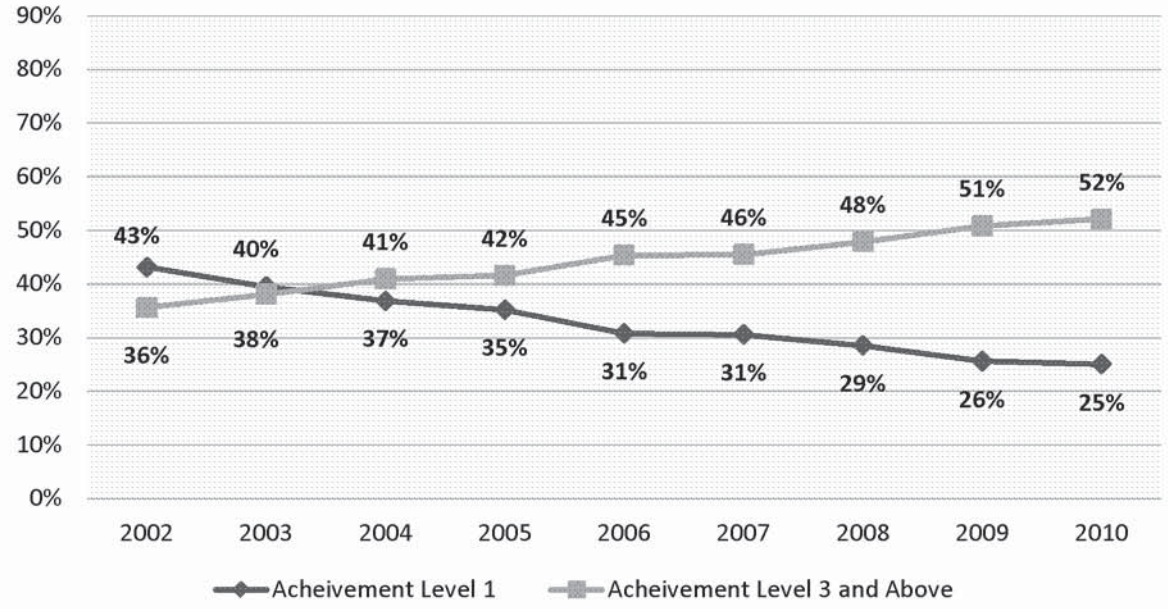
FCAT Reading

Grades 3-10 by Achievement Level



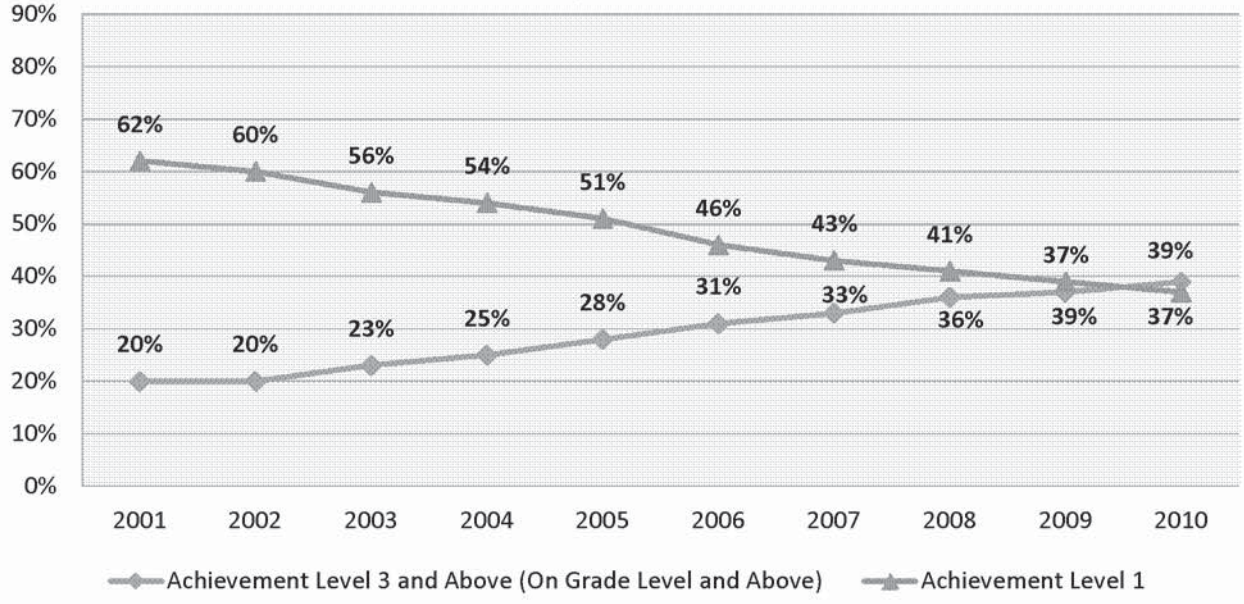
Students Receiving Free or Reduced Price Lunch Have Increased Their Performance

FCAT Reading Grades 3-10 by Achievement Level



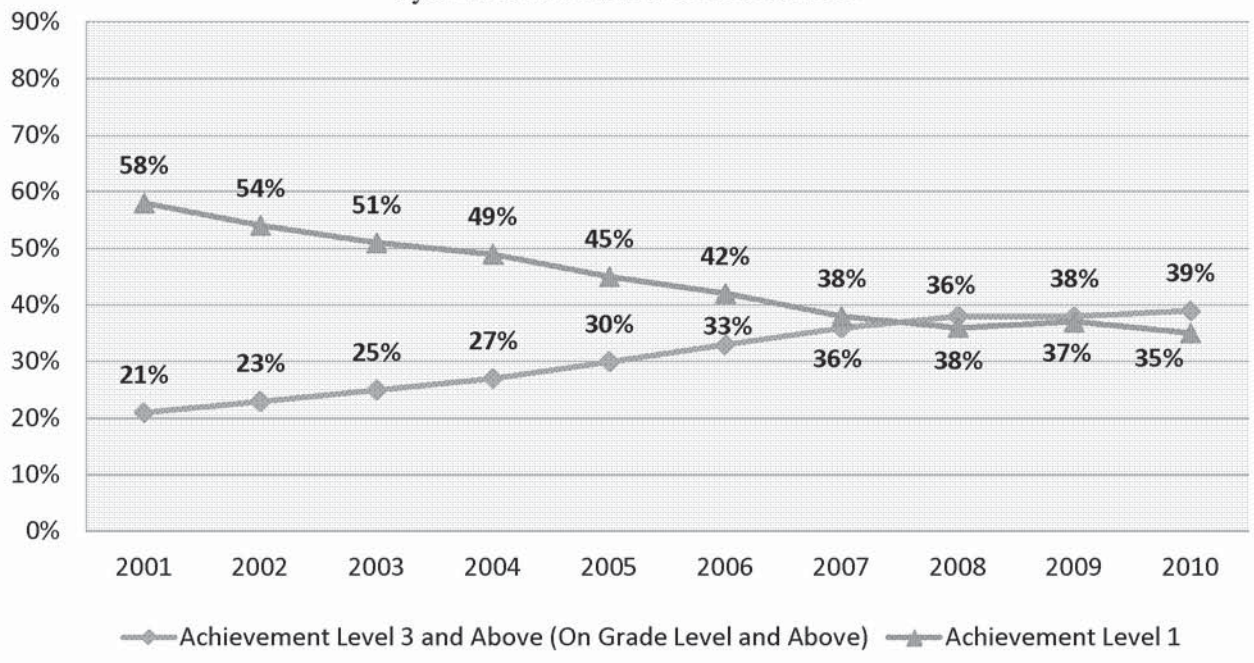
Students with Disabilities Have Increased Their Performance

FCAT Mathematics
Grades 3-10 by Achievement Level



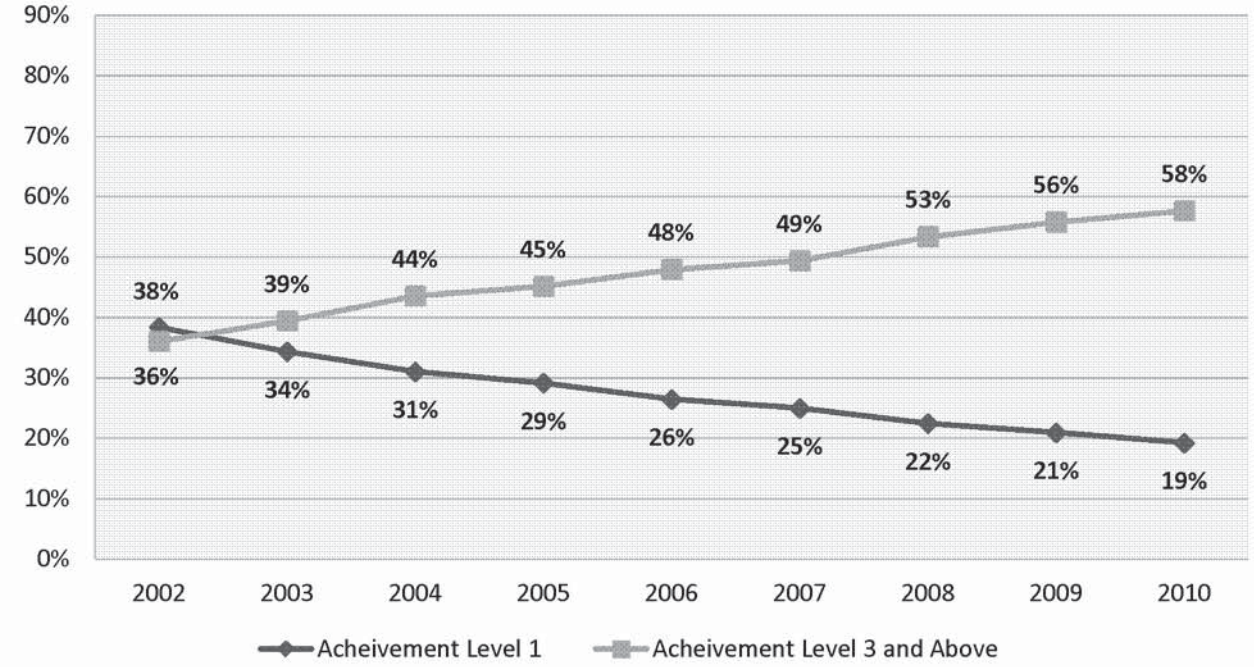
English Language Learners Have Increased Their Performance

FCAT Mathematics
by Achievement Level Grades 3-10



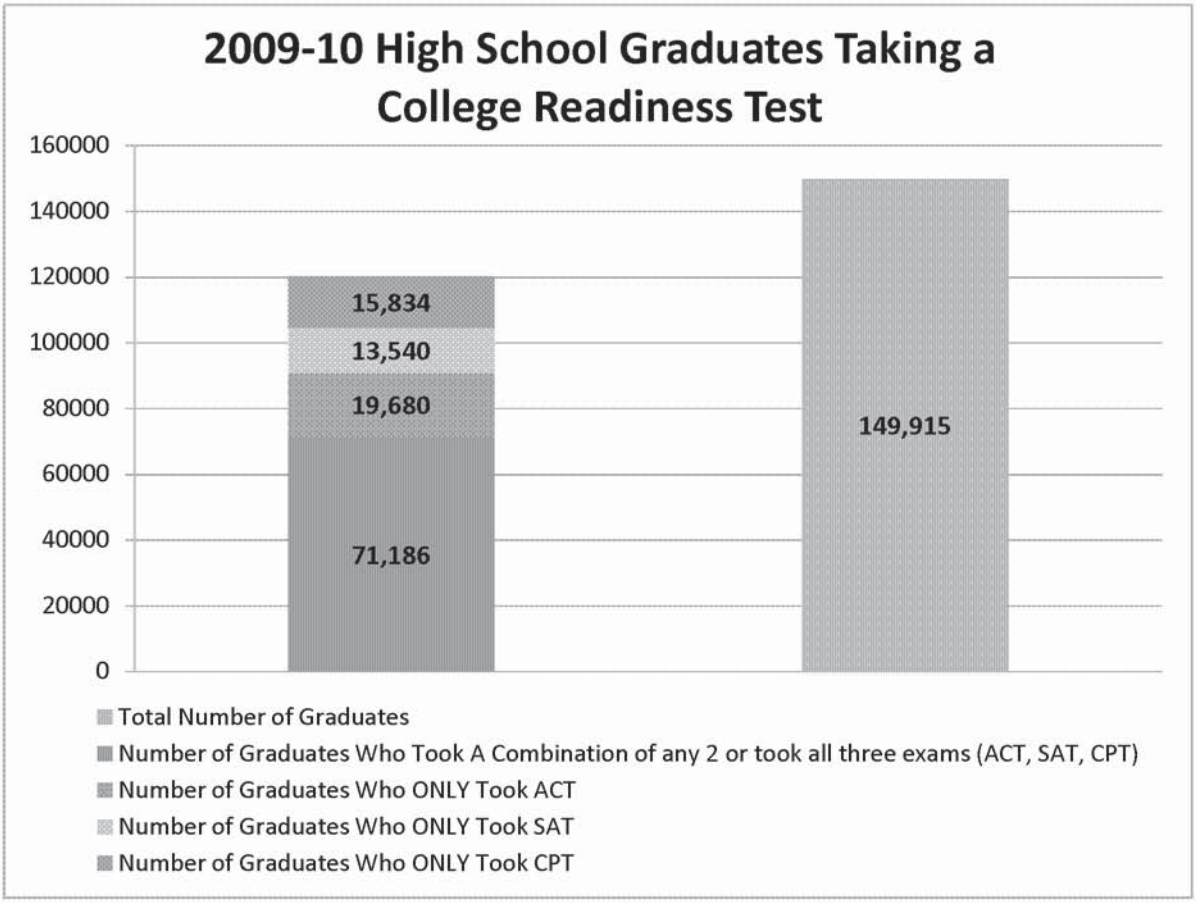
Students Receiving Free or Reduced Price Lunch Have Increased Their Performance

FCAT Mathematics
by Achievement Level Grades 3-10



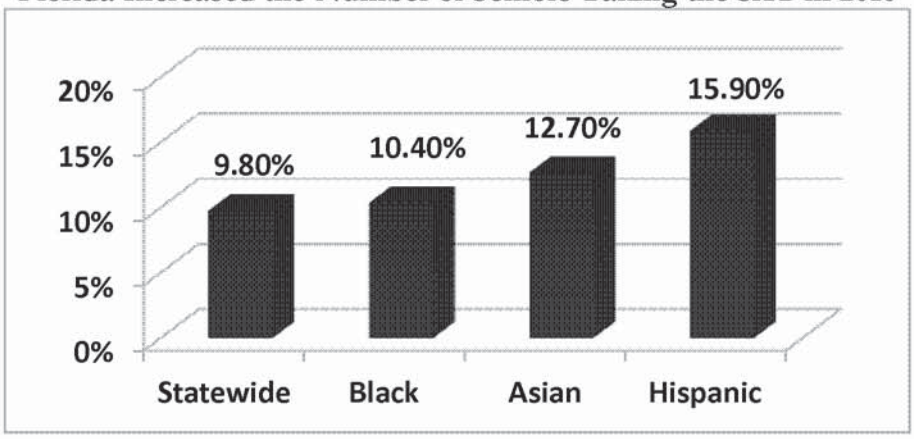
Successful College Readiness Outcomes for Florida's High School Grading System

Florida's high school grading system provides incentives for high schools to graduate students that are college and career ready. Florida has increased its participation rates on the SAT and ACT, its participation and performance on AP exams, its performance of subgroups, and its graduation rates. Florida provides funding for all students to take the PSAT or PLAN in 10th grade which helps students think about college readiness early in their high school career.



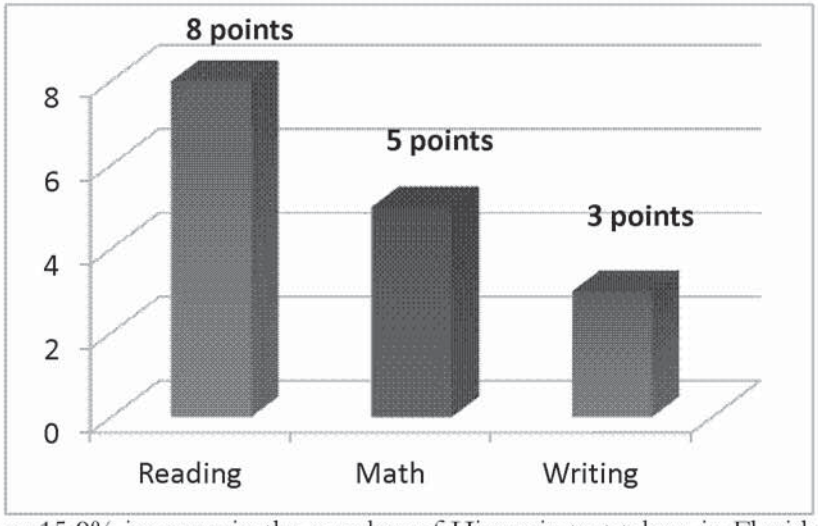
- **College Preparation – SAT (2010 Florida Highlights):**
  - 78,985 Florida public school seniors took the SAT in 2010, an increase of 9.8% over the previous year.

Florida Increased the Number of Seniors Taking the SAT in 2010



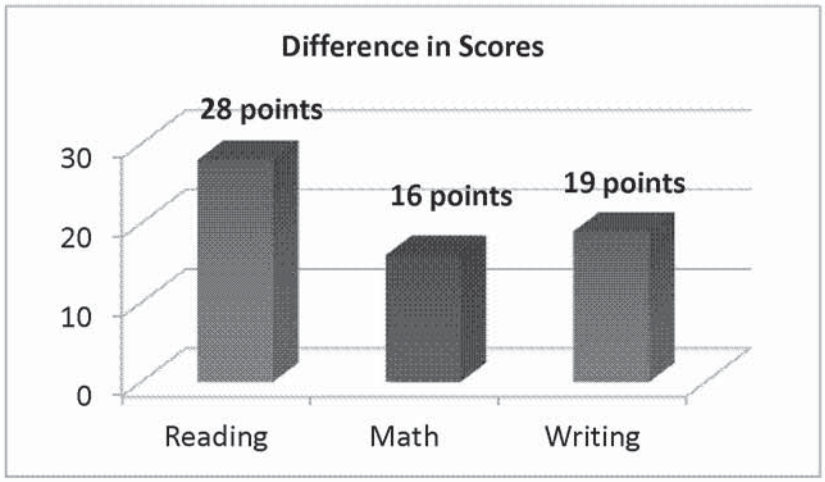
  - The percentage of Florida's standard diploma graduates who took the SAT increased from 48.7% in the previous year to 54.2%.
  - Florida's African-American students showed an annual 10.4% increase in SAT test takers in 2010 versus a 7.1% increase nationwide.
  - Florida's African-American public school test takers outscored their counterparts nationwide on all three SAT subsections by a margin (mean scale score) of 8 points in reading, 5 points in mathematics, and 3 points in writing.

Florida's African-American Students Scored Higher than National Counterparts
Difference in Scores

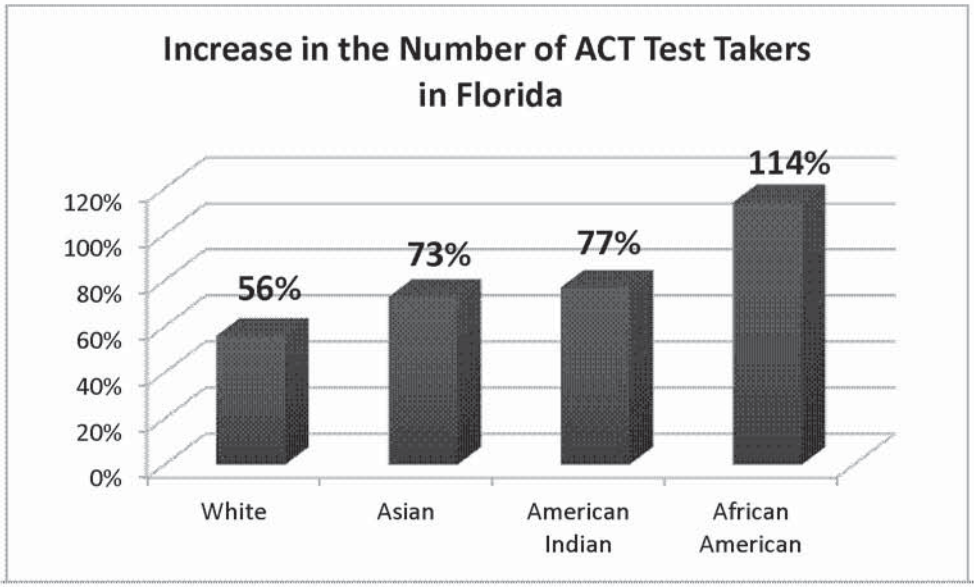


  - There was a 15.9% increase in the number of Hispanic test takers in Florida's public schools, compared to a 7.7% increase nationwide.
  - Florida's Hispanic students outperformed their counterparts nationwide on all three subsections by a margin of 28 points in reading, 16 points in mathematics, and 19 points in writing.

Florida's Hispanic Students Scored Higher than National Counterparts

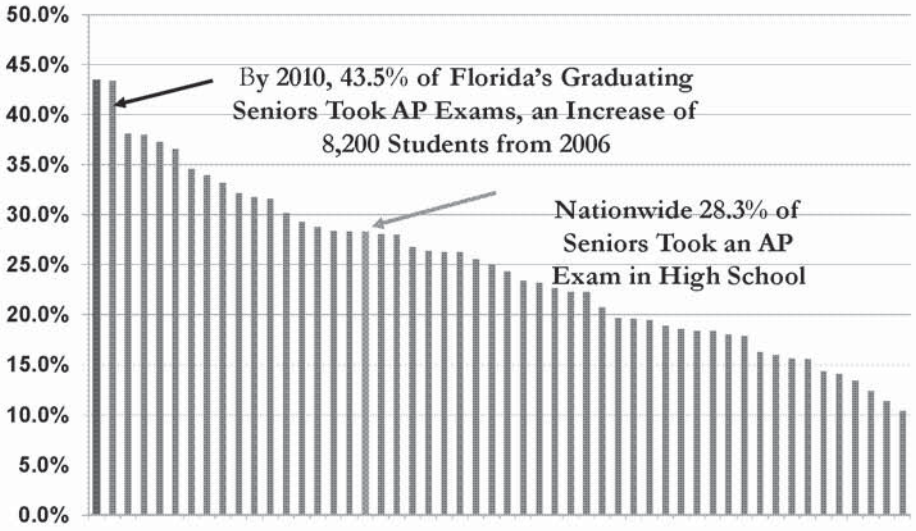


- **College Preparation – ACT (2010 Florida Highlights):**
  - A total of 113,480 of Florida's 2010 public and nonpublic graduating seniors took the ACT at some point during their high school career, an increase of 8,183 (8%) over 2009. This compares with a 6% increase nationwide.
  - Approximately 53% of Florida's ACT test takers are minority students, compared to 32% nationwide.
  - Florida has considerably larger percentages of African-American and Hispanic students taking the ACT than the nation. In 2010, African-American students represented 26% of Florida test takers, compared to 15% for the nation. Hispanic students represented 24% of Florida test takers, compared to 11% for the nation.
  - Over the past five years, Florida has experienced substantial growth in the number of minority students taking the ACT test. African-American test takers have increased by 114%, Hispanics by 140%, American Indians by 77%, Asians by 73%, and Whites by 56%.



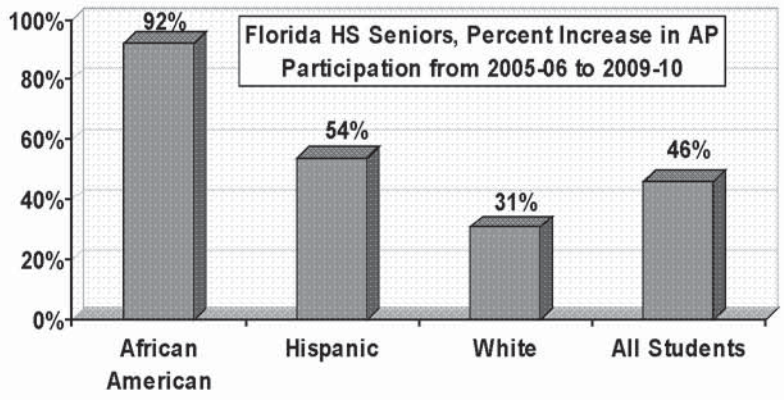
- **Advanced Curricula**
  - Florida has greatly increased the number and percentage of students taking AP courses and exams. This increase has been greatest among Florida's African-American and Hispanic populations.
  - The following charts illustrate the strides Florida's students are making:

By 2010, Florida Led the Nation in the Percentage of High School Graduates Taking AP Exams



Narrowing the Achievement Gap

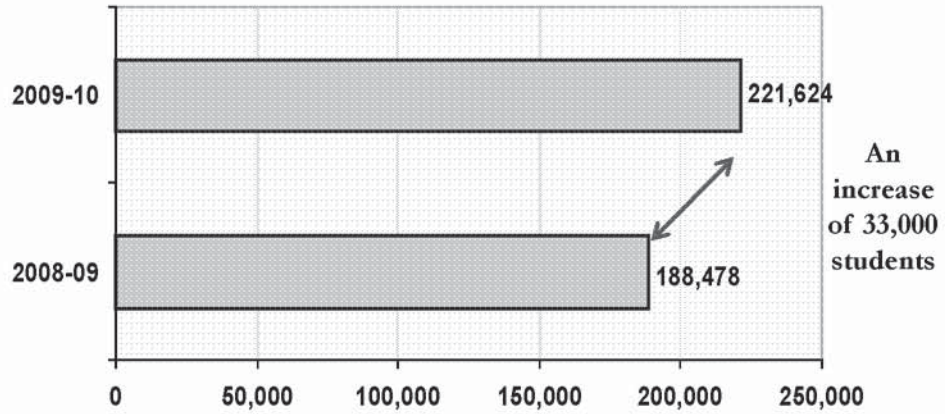
In Florida, African-Americans had the highest percent increase in AP participation among 12th graders during the last five years.



Source: 7th Annual AP Report to the Nation (Feb. 2011), State Supplement, Florida. Figure 5.

Florida Advanced Course Enrollments Increasing
(Including AP, IB, AICE, and Dual Enrollment)

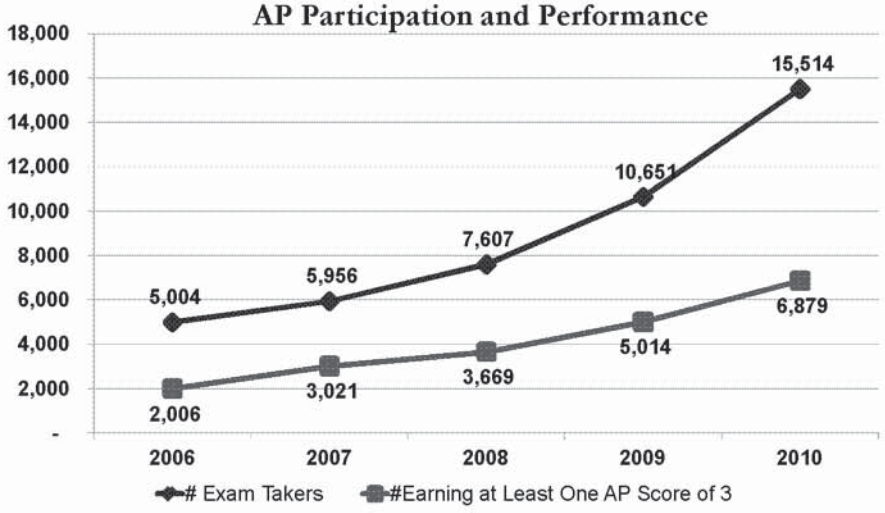
Unduplicated Count of Florida High School Students Enrolled in AP, IB, AICE, and/or Dual Enrollment Courses During 2008-09 and 2009-10



- Florida is one of 14 states that have eliminated the Hispanic achievement gap on AP exams.
- In 2010 23.1% of Florida's high school graduates were Hispanic.
- 27.9% of the 2010 graduating class's successful AP exam takers were Hispanic.

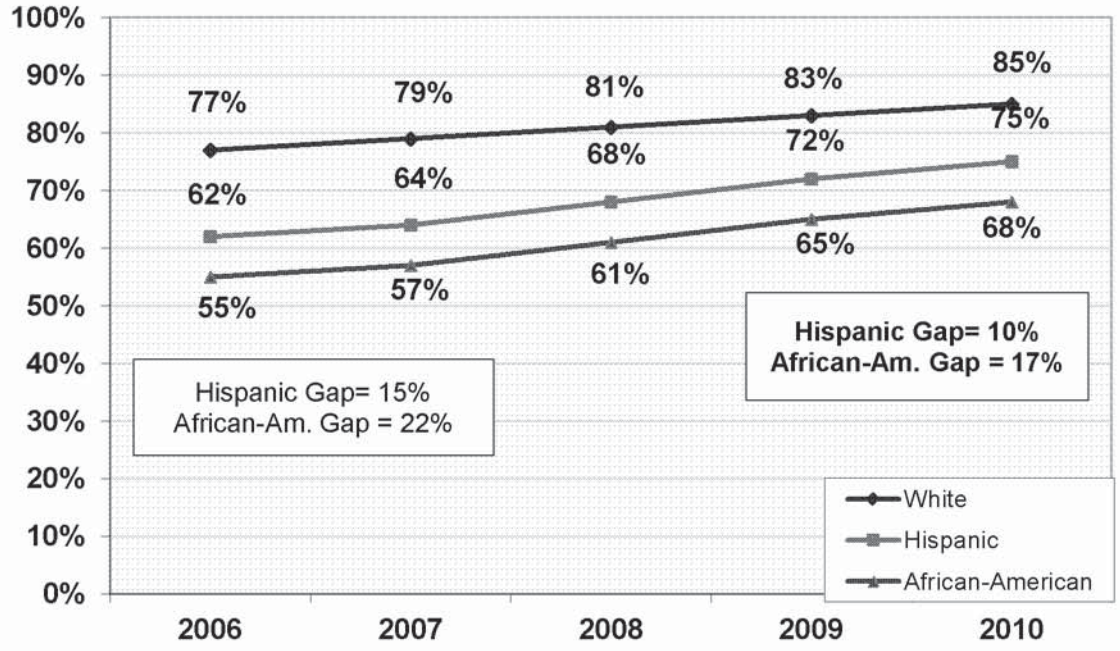
Florida Has Also Seen Increased AP Participation and Performance Among Low-Income Students

Florida's Low-Income High School Seniors: AP Participation and Performance



- Graduation Rates
  - As with other measures of student achievement, such as assessment scores, Florida has seen continuing increases in the percentage of on-time graduates in recent years.
  - The overall graduation rate improved to 79% in 2009-10, up from 76.3% in 2008-09.
  - The graduation rate of African-American students improved by 3.5 percentage points this year, and by 13.1 points over the last five years.
  - The graduation rate of Hispanic students improved by 3.2 percentage points this year, and by 13.3 points over the last five years.
  - Both African-American and Hispanic students have closed the gap with white students by 5 percentage points during the period from 2006 to 2010.

Florida's High School Graduation Rate has Increased Significantly Over the Last Five Years



Differentiated Accountability will be Aligned with School Grades to Improve Clarity, Create Incentives, and Provide Support to Close Achievement Gaps for All Students

Florida proposes to combine its successful School Grades and DA systems to eliminate confusion while continuing to provide the supports needed by struggling schools and recognizing high-performing schools and schools that increase performance through its school reward/recognition programs. Florida will use the proven School Grades system to categorize those schools that are struggling and need support. Providing the appropriate educational opportunities for students at the lowest-performing schools requires the support not only of state-level leaders but of local communities and LEA leaders, and a factor in garnering that support is the clarity of our message. Currently the DA system uses a combination of federal and state criteria to identify struggling schools but this model has resulted in massive confusion among communities and stakeholders and has sent mixed messages to schools and LEAs about the progress of all schools. Mixed messages

from the federal and state accountability systems reduce Florida's ability to focus all stakeholders on moving struggling schools forward. Ultimately, the state will not use the terms Prevent, Focus/Correct, and Priority/Intervene, but simply "C," "D," and "F."

Use School Grades to Categorize Schools in Differentiated Accountability (DA)

School Grade	ESEA Category	DA Category
A	Reward	
Schools that increase their grade	Reward	
B		
C		Prevent
D	Focus	Correct
F	Priority	Intervene

In 2008, the U.S. Department of Education selected Florida as one of only six states initially approved to participate in the DA pilot initiative. Through DA the state is allowed greater flexibility in providing essential technical assistance and interventions to the schools with greatest need. Currently, Florida's DA model directs increasing school-wide interventions and school and LEA accountability based on inputs from two systems for evaluating school performance: (1) AYP and (2) the state-assigned school grade. This has caused confusion and a lack of focus when the two systems provide mixed messages about a school's performance. In some cases, it has undermined the ability of LEAs to undertake some of the more difficult strategies involved in DA, such as reconstitution under alternative governance.

The proposed DA statewide approach for struggling schools is critical to Florida's path to increase the excellence of education for all students. The support and assistance provided to each school in Florida's model is individualized depending on the needs of that school. Through DA, schools are categorized based on the school's achievement. The lowest-performing schools receive the most support, and are required (through measures codified in state statute and governing rule) to implement the most robust interventions that will help lead to successful school improvement. In order to provide direct support to schools, Florida has created a regional system of support for schools and LEAs. The regional system of support provides educators who work with and support schools and LEAs around the state that fail to meet state educational performance standards. As Florida continues to raise expectations for student performance during our transition to increasingly ambitious standards and more rigorous assessments, we are also working harder across the state to lift the performance of our schools that have had the greatest struggles to improve academic performance. The supports provided are detailed more specifically later in Section 2. More information on the regional system of support system is available at http://flbsi.org/DA/regional.htm.

Florida also has in place and will continue its school recognition program to reward and recognize

its highest-performing schools ("A" schools) and schools that improve their school grade one or more grade levels and sustain it the following year.

In this flexibility request, Florida proposes to change the way it identifies struggling schools that will receive support through the DA program. Florida will align DA with the state's school grading system. This will increase clarity for stakeholders while holding schools accountable for the progress of all students and providing schools and LEAs the support they need to increase student achievement. In addition to clarifying the entry criteria for schools, Florida will also propose high standards for exit criteria for schools in the lowest-performing category, Priority/Intervene schools. This will better differentiate schools that are making progress (and that should continue applying existing turnaround strategies) from those that are not providing adequate instruction and opportunity for their students.

Differentiated Recognition, Accountability, and Support Systems for Reward, Prevent, Focus/Correct, and Priority/Intervene Schools

Listed below is a summary of the proposed recognition, accountability, and support systems for the four categories of schools. These systems are designed to create incentives and supports to close achievement gaps for all subgroups of students.

- Reward Schools – "A" schools and schools that improve one or more letter grade.
  Schools assigned a grade of "A" and schools that improve one or more letter grade would be classified as Reward schools. Reward schools would be eligible to receive funding appropriated by the State Legislature through the Florida School Recognition Program. Additional information on Florida's School Recognition Program is provided in Section 2.C of this document.

- Prevent Schools – "C" schools.
  Schools assigned a grade of "C" would be classified in Prevent status. Schools in Prevent status will prepare a school improvement plan and implement appropriate interventions, with LEA monitoring and support designed to improve student performance.

- Focus/Correct Schools – "D" schools.
  Schools assigned a grade of "D" would be classified in Focus/Correct status. Additional information is provided in Section 2.E of this document. School improvement measures for Focus/Correct schools include the following:
  - The school implements interventions
  - The LEA directs interventions
  - The LEA monitors progress
  - The state provides support through regional teams

- Priority/Intervene Schools – "F" schools.
  Schools assigned a grade of "F" would be classified in Priority/Intervene status. Additional information is provided in Section 2.E of this document. Florida schools in Priority/Intervene status are subject to more intensive intervention efforts required by FDOE and managed

(initially) by the LEA.

- The state provides support through regional teams.
- The LEA chooses and begins planning for implementation of the selected school turnaround option.
- During a school's first year in Priority/Intervene status the LEA must submit an Intervene Option Plan outlining the school turnaround option it has selected and how that option will be implemented. If a school does not exit Priority/Intervene status during the first year, the LEA must implement the turnaround option it has selected from the options below. The LEA may choose from the following State Turnaround Models:
  - Reopen as a district-managed turnaround school (transformation/turnaround)
  - Reassign students and monitor progress (closure)
  - Close and reopen as a charter school (restart)
  - Contract with a private entity to run the school (restart)
  - Hybrid Model (proposal in this flexibility request)

The chart below provides a crosswalk for the above referenced State Turnaround Models.

Federal Turnaround Models Designation	State Turnaround Model Designation	Characteristics
Transformation/ Turnaround	District-Managed Turnaround	• Replace Principal/Administration • Replace Staff • New Curriculum Focus • Altered Governance/Autonomy
Closure	Closure	School closes and students are redistributed to higher-performing schools; the LEA must monitor and report on the students' progress for a period of three years
Restart	Convert to a Charter or Employ a Management Company	Must engage a high-performing charter or education management company with a proven track record of success
Hybrid Model (proposal in this flexibility request)	New proposed flexibility option that may blend both LEA control with governance and autonomy found in external provider	Design must be as rigorous as other turnaround options

- After two years, if the school turnaround option implemented does not result in the school exiting Priority/Intervene status the LEA must choose a different school turnaround option to implement, unless they are making progress that would make allow them to exit Priority/Intervene or enter a hold status.
- To exit Priority/Intervene status a school must meet the following criteria:
  - Improve the school grade to a "C" or higher.
  - Improve achievement in reading and mathematics to meet criteria that will be established by the State Board of Education.
- If the school meets at least one of the exit criteria while the LEA is implementing the turnaround option, the school will be placed in a hold status for up to two years to

continue implementation. The hold status is designed to allow schools that are making progress to continue implementing their current strategy.

Under the proposal for an enhanced DA system, Priority/Intervene schools could implement one of the turnaround models in the chart above for four years. The school would automatically have two years to implement a model and could have another two years, in a hold status, if the school improved to a grade of "D" or improved enough to meet achievement targets in mathematics and reading. After that, the LEA is required to choose a new option from those in law and submit a new Intervene Option Plan. Beyond the four years to implement an option, an LEA could continue the option and interventions if they demonstrated to the State Board of Education that the school is likely to improve enough to exit the Priority/Intervene category with more time (this is currently a provision in Section 1008.33(5)(b), Florida Statutes).

System of Support for Schools in Florida's Differentiated Accountability Classifications to Close Achievement Gaps for All Students

Florida's proposed DA plan, as outlined above, directs school-wide and subgroup interventions at the school and LEA level. This will allow FDOE to operate a tiered approach to work directly with schools and LEAs that are truly the lowest-performing schools to increase student achievement. The support and assistance provided to each school is individualized depending on the needs of that LEA and school. The lowest-performing schools receive the most support, and under the proposed DA plan, these schools are required to implement the most robust interventions that will help lead to successfully raising student achievement. Florida's system of providing support and assistance to struggling schools as seen in the charts in Section 2.G. The chart below illustrates the increasing levels of LEA and state support, monitoring, and oversight based on a school's status in the proposed DA system.

School Status/ Differentiated Accountability Support	C Schools Prevent Schools	D Schools Focus/ Correct Schools	F Schools Priority/ Intervene Schools
School Improvement			
1. Creation of LEA-based leadership team 2. Creation of Literacy Leadership Team 3. Development of District Improvement and Assistance Plan (DIAP) 4. Completion of Mid-year Analysis of Progress 5. Review and monitoring of implementation of School Improvement Plan by the school advisory team and the LEA		X	X
6. Review of budget allocations and alignment of resources by FDOE		X	X
7. Review and monitoring of implementation of School Improvement Plan by FDOE			X
Leadership			
1. LEA reviews members of the school leadership team and replaces them as necessary based upon overall school performance 2. LEA includes student achievement in the evaluation process of LEA administrators who supervise persistently lowest-achieving schools and provides performance pay for raising student achievement	X	X	X
3. Principal and assistant principal have a record of increasing student achievement (principal must have a record of turning around a similar school) 4. LEA and FDOE review members of the school leadership team and replace them as necessary based upon overall school performance 5. LEA provides school-based administrators and instructional coaches with performance pay		X	X
Educator Quality			
1. Teachers must be highly qualified and certified in-field 2. All paraprofessionals must be highly qualified 3. School is fully staffed by the first day of school 4. LEA ensures that performance appraisals of instructional personnel are primarily based on student achievement 5. LEA ensures that performance appraisals of the administrative team include student achievement, as measured by the FCAT, as well as goals related to targeted subgroups and school-wide improvement 6. LEA trains staff on performance appraisal instruments and ensures that the performance appraisal process is implemented 7. LEA provides teachers with performance pay for raising student achievement 8. LEA develops plan to encourage teachers and instructional coaches to remain or transfer to lower-performing schools based on increasing learning gains 9. LEA provides a reading coach, mathematics coach, and science coach to develop and model effective lessons, to lead Lesson Study, to analyze data, and provide professional development on the Common Core State Standards/Next Generation Sunshine State Standards.	X	X	X

School Status/ Differentiated Accountability Support	C Schools Prevent Schools	D Schools Focus/ Correct Schools	F Schools Priority/ Intervene Schools
Educator Quality (cont.)			
10. Instructional coaches maintain a daily log of activities; school and LEA leadership teams monitor 11. LEA, with assistance from FDOE, reviews and replaces teachers who have not contributed to increased learning gains or those teachers who did not contribute to improving the school's performance 12. FDOE oversees the staffing of the school prior to the start of school 13. LEA implements a differentiated pay policy that includes differentiation based on LEA-determined factors including, but not limited to additional job responsibilities, school demographics, critical shortage areas, and level of job performance difficulties 14. LEA ensures that mid-year vacancies are filled		X	X
Professional Development			
1. School ensures that Individual Professional Development Plans (IPDPs) for teachers of targeted subgroups include professional development targeting the needs of subgroups	X		
2. LEA ensures that leadership professional development targets the needs of subgroups 3. LEA provides professional development opportunities for school administrators that target the specific needs of subgroups 4. LEA provides principals and assistant principals with professional development on monitoring classroom instruction and guiding/supporting/monitoring the activities of instructional coaches 5. LEA provides professional development on Florida's Continuous Improvement Model, Common Core State Standards/Next Generation Sunshine State Standards, Response to Intervention, Lesson Study, and School Grade and AMO calculations	X	X	X
6. LEA ensures that IPDPs for teachers of targeted subgroups include professional development that targets the needs of subgroups 7. LEA participates in a sample of IPDP meetings 8. LEA ensures that appropriate resources are provided to redesign the master schedule to allow for common planning time for data-based decision making within the problem-solving process, job-embedded professional development on the Common Core State Standards/Next Generation Sunshine State Standards, and Lesson Study 9. Common planning time is established within the master schedule to allow grade level meetings to occur daily in elementary schools and by subject area at the secondary level; all grade level and subject area teachers participate at the same time and include Lesson Study; if the master schedule prevents this from occurring, the LEA establishes weekly Lesson Study implementation after school for a minimum of one hour a week on the same day		X	X

School Status/ Differentiated Accountability Support	C Schools Prevent Schools	D Schools Focus/ Correct Schools	F Schools Priority/ Intervene Schools
Professional Development (cont.)			
10. LEA creates and maintains a pool of highly-qualified reading, mathematics, and science teachers and instructional coaches to serve in DA schools.		X	X
11. LEA offers a summer professional development academy that is developed in conjunction with FDOE to school administrators, teachers, and instructional coaches; LEA partners with the regional team to encourage school administrators, teachers, and instructional coaches to participate in the DA Summer Academies		X	X
12. LEA or school develops instructional pacing guides that are aligned to the Common Core State Standards/Next Generation Sunshine State Standards in reading, writing, mathematics, and science 13. School ensures that students are properly placed in rigorous coursework 14. LEA and school implement the LEA K-12 Reading Plan	X	X	X
15. FDOE reviews instructional pacing guide aligned to the Common Core State Standards/Next Generation Sunshine State Standards 16. LEA reviews data to determine the effectiveness of all instructional programs and class offerings 17. FDOE reviews data to determine the effectiveness of all instructional programs and class offerings 18. LEA extends the learning day		X	X
Florida's Continuous Improvement Model			
1. School implements Florida's Response to Intervention model 2. LEA implements Florida's Continuous Improvement Model (FCIM) 3. School develops and implements a comprehensive FCIM model which includes an FCIM calendar, FCIM focus lessons (mini-lessons on tested benchmarks), curriculum pacing guide, and progress monitoring data collection/analysis schedule 4. LEA monitors implementation of FCIM 5. LEA ensures real-time access to student achievement data 6. LEA prescribes interim (benchmark baseline, mid-year, and mini-) assessments in reading, writing, mathematics, and science for level 1-3 students 7. LEA administration ensures that data chats are conducted between LEA administration and school administration, school administration and teachers, and teachers and students following baseline, mini-, and mid-year assessments	X	X	X
8. LEA uses the Problem Solving/Response to Intervention process to analyze progress monitoring data in reading, writing, mathematics, and science through interim assessments to inform instruction		X	X
9. LEA participates in the Florida Assessments for Instruction in Reading (FAIR) for level 1-3 students		X	X

School Status/ Differentiated Accountability Support	C Schools Prevent Schools	D Schools Focus/ Correct Schools	F Schools Priority/ Intervene Schools
Monitoring Processes and Plans			
1. School provides quarterly updates on the implementation of the School Improvement Plan to the School Advisory Council and makes updates to the School Improvement Plan 2. School leadership team monitors implementation of the School Improvement Plan 3. School participates in a comprehensive instructional monitoring process 4. LEA develops a comprehensive instructional monitoring process and follow-up that includes classroom, school leadership team, and school-wide monitoring	X	X	X
5. LEA ensures that schools demonstrating the greatest need, based on data analysis, receive the highest percentage of resources. 6. FDOE reports progress bi-monthly to the State Board of Education 7. Monthly LEA meetings with the Regional Executive Director (RED) and LEA department leaders held to coordinate strategies and resources to assist lowest-performing schools 8. LEA dedicates a position to lead the turnaround effort at the LEA level; the selected employee will report directly to the superintendent and directly supervise principals at the lowest-performing schools		X	X

In its DA system, Florida focuses on providing supports to struggling schools and LEAs; however, there are consequences if schools/LEAs do not act within the terms of the state's DA plan. LEAs must submit an assurance of compliance with requirements outlined in Florida's DA plan and Priority/Intervene schools must submit an Intervention Option Plan to reconstitute the school should it not improve. For all LEAs and schools, non-compliance with any of the required interventions and supports may lead to:

- State Board of Education intervention in operations
- State funds withheld
- Report of non-compliance to the State Legislature with recommended legislative action
- Conditions placed on Title I or Title II grant awards
- Redirection of Title II, Part A funds
- Movement to a more severe category

Regional System of Support

In order to provide direct support to schools, Florida has created a regional system of support. There are five regional teams throughout the state with each team consisting of a Regional Executive Director; Instructional Specialists for reading, mathematics, science, Career and Technical Education, and using data; reading and STEM coordinators; and Response to Intervention Specialists. Response to Intervention Specialists work with schools to develop data systems to identify and then provide supports to students with academic and behavioral problems. The regional system of support provides LEAs and schools with access to change agents who possess a proven record of increasing student achievement in low-performing schools. These regional teams work

directly with schools and LEAs in the areas of curriculum and instruction, school and LEA leadership, school improvement planning, professional development, teacher quality, and data analysis.

Rationale and Supporting Information for Selecting Florida's School Grades System to Classify Schools in Differentiated Accountability

The selection of Florida's School Grades system as the key input for determining schools' DA status is based on several factors:

- Florida's "A" through "F" School Grades system provides understandable measures of school achievement for all stakeholders and drives incentive for improving student achievement.
- School grading has a history of success (more than a decade) in improving critical areas of academic performance for Florida's student populations, including all subgroups, spanning elementary, middle, and high school levels of instruction.
- School grading is founded on measurable student achievement in core academic areas, including test results measuring student performance as well as student progress.
- Florida's high school grading system includes additional measures of achievement for evaluating on-time graduation, advanced curriculum participation and performance (including at least one measure for career readiness), and college readiness.
- Florida's School Grades system is based on the idea that raised expectations are a vital part of success in implementing accountability to improve opportunities for all of Florida's students, and that continuing to raise expectations and standards is essential for moving Florida where we want to be within the next five years, when the state will apply national common assessments to provide both national and international comparative measures for evaluating Florida students' progress and achievement.
- Our School Grades system works to most effectively identify successful schools, reward success, and enable improvement.
- Florida's School Grades system is designed to accommodate progressive improvements in its own structure over time.
- The current accountability process has led to the public's inability to reconcile the school grade with the DA timeline for the implementation of rigorous turnaround requirements in the persistently lowest-achieving schools and, as a result, undermined the ability of LEAs to implement turnaround strategies.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☒ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

Each year the Florida School Grades system uses assessments in four subject areas to measure the current-year performance of students: reading, mathematics, writing, and science. More detailed state-level reporting of student performance in these subject areas is provided in Florida's School Public Accountability Reports (SPARs), which are designed to meet requirements for annual state, LEA, and school reports in compliance with ESEA. The SPARs are posted online at http://doeweb-prd.doe.state.fl.us/eds/nclbspar/index.cfm.

The table below provides the percentage of students in the "all students" group that performed at level 3 or higher on the state's 2011 administration of each assessment for all grades assessed. Florida is in the process of raising standards for all of its assessments so the percentage of students scoring level 3 or higher will likely be different in the future.

Subject Area Proficiency on the FCAT, School Grades

	Percent Proficient 2010 Statewide School Averages			
School Type	**Reading**	**Math**	**Writing**	**Science**
Elementary	76	76	84	52
Middle	68	67	90	46
High	49	76	87	42
Combination	68	69	84	49

For all schools, the assessment components of the school grading methodology are based entirely on student performance and progress measured in core academic subjects (reading, mathematics, writing, and science for performance; reading and mathematics for learning gains [progress]). Florida's current elementary and middle school grading formulas weight student performance on the above four assessments as 50% of the grade with the other 50% comprised of points for student learning gains. The weighting of points for assessment-based components in the school grading system for Florida's elementary and middle schools are addressed more specifically in Section 2.A.i of this document.

For Florida's high school grading system, the state assessment-based components are weighted at 50% of the high school grade, while the other 50% of the available school grade points are weighted toward component areas that directly measure, or are otherwise essential to, career and college readiness: on-time graduation, participation and performance in advanced curricula (including Industry Certifications), and postsecondary readiness in reading and mathematics. These additional components for measuring high school performance were implemented beginning in 2009-10 to provide a more comprehensive measure of high schools' effectiveness in preparing students for success at the next level after graduation.

Florida High School Grades

50% Based on Statewide Assessments	50% Based on Other Factors
• Performance in reading, mathematics, science, and writing • Learning gains for all students in reading and mathematics • Learning gains for the lowest-performing 25% in reading and mathematics	• Overall graduation rate • At-risk graduation rate • Participation and performance in accelerated courses • College readiness in reading and mathematics • Growth and decline of these measures

Current High School Grades Model

Reading	Mathematics	Writing	Science	Acceleration	Graduation Rate	College Readiness
Proficiency (100) 6.25%	Proficiency (100) 6.25%	Proficiency (100) 6.25%	Proficiency (100) 6.25%	Participation (175) 10.94%	Overall (200) 12.5%	Reading (100) 6.25%
Learning Gains (100) 6.25%	Learning Gains (100) 6,25%			Performance (125) 7.81%	At-Risk (100) 6.25%	Math (100) 6.25%
Low 25% Gains (100) 6,25%	Low 25% Gains (100) 6.25%					
300 points 18.75%	300 points 18.75%	100 pts. 6.25%	100 pts. 6.25%	300 points 18.75%	300 points 18.75%	200 points 12.5%

Because these components constitute the points that determine schools' assigned school grades and because school grades are key to providing rewards for successful schools and determining required steps of improvement for schools performing at lower levels, these measures provide direct incentives for schools to expand advanced course offerings, increase the quality of instruction, and focus on preparing all students for the future.

Florida's subject area assessments measure the extent to which students have mastered the Next Generation Sunshine State Standards. Florida increased its standards when it implemented the Next Generation Sunshine State Standards and also increased the rigor of the FCAT 2.0 for which Florida is currently setting cut scores. Florida is now working toward implementing the Common Core State Standards adopted by the State Board of Education. Beginning in 2014-15 Florida will assess

student performance using the common assessments developed through the PARCC consortium. School grade components (measured by state assessments) for elementary and middle schools focus on the same general subject areas that, later in students' education careers (toward high school graduation), are also measured by college placement examinations to determine the readiness of students for admission to degree-seeking postsecondary coursework. The content measured on reading and mathematics assessments is particularly relevant in this regard, as success in these areas also determines a student's ability to master content in career education fields.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☒ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

Overview

Florida's most compelling reasons for selecting the following Annual Measurable Objectives (AMOs) is that they are consistent with the state's long-term approach to school accountability based on measuring individual student performance. This accountability system has a clear record of tremendous success in raising student achievement for all students and all subgroups spanning more than a decade. Success in raising student achievement in Florida is clearly illustrated in graphs (Section 2.A.i) that address Florida's historic School Grades distribution, student achievement on NAEP examinations to reduce achievement gaps, trends in student achievement on the FCAT, including trends in achievement gap reduction for students with disabilities and English language learners, and graduation rate trends. For example, Florida has the highest combined NAEP gains in the nation for students with disabilities, African-American students, and students receiving free and reduced lunch, and one of the highest combined NAEP gains for Hispanic students. In addition, Florida has increased achievement for all students and reduced the achievement gap in mathematics and reading for subgroups. Florida has led the nation in college- and career-ready metrics. For example, Florida leads the nation in the percentage of graduates taking AP examinations and has implemented programs that provide students the access to earn national industry certifications to demonstrate career readiness.

Florida has derived the following AMOs from the state's School Grades system including measures focusing on the most struggling students, measures of student performance, and a measure designed to benchmark Florida's performance against the highest-performing states and nations through NAEP, Trends International Math and Science Study (TIMSS), Progress in International Reading Literacy Study (PIRLS), and Programme for International Student Assessment (PISA).

Florida's AMOs include:

- School Grades, which provide a comprehensive overview of the performance of the school including subgroup achievement and student learning gains.
- School's annual target for learning gains in mathematics and reading for the lowest-performing 25% of students. This group includes over representation of specific subgroups that are historically low-performing and focuses schools on raising their achievement and reducing achievement gaps.
- School's annual target for increasing the performance of all students and all subgroups. These targets will drive increases in performance to reduce the proportion of students scoring at levels 1 and 2 and increase the proportion of students scoring at levels 3 and above.
- Florida's student performance on NAEP, TIMSS, PIRLS, and PISA compared to the highest-performing states and nations. This AMO is designed to keep Florida moving forward toward national and international competitiveness. Florida will compare its NAEP scores to the top five states and its TIMSS, PIRLS, and PISA scores to the ten top-performing nations. This will make sure that Florida is benchmarking its progress not only within the state but externally to achieve high levels of performance.

School, LEA, and state achievement of the new AMOs will be reported on the state's annual report cards (Florida's School Public Accountability Reports [SPARs]), which are posted at

http://doeweb-prd.doe.state.fl.us/eds/nclbspar/index.cfm. Florida's AMOs will be reported in a separate table for progress on AMOs on these annual reports (the SPARs).

Current AMO Schedule for AYP Reporting

Florida's current AMO schedules for reading and mathematics assessment performance are available on pages 95 and 96 of the state's federally approved accountability workbook at http://www2.ed.gov/admins/lead/account/stateplans03/flcsa.doc. These AMOs, which Florida will replace via the current flexibility request, are copied below for ease of reference:

Annual Proficiency Targets for Subgroups
(AYP Percent-Proficient Targets)

School Year	Reading Target	Mathematics Target
2001-02	31%	38%
2002-03	31%	38%
2003-04	31%	38%
2004-05	37%	44%
2005-06	44%	50%
2006-07	51%	56%
2007-08	58%	62%
2008-09	65%	68%
2009-10	72%	74%
2010-11	79%	80%
2011-12	86%	86%
2012-13	93%	93%
2013-14	100%	100%

Under the current AYP structure for 2010-11, 90% of Florida's schools did not make AYP, but we know that to characterize 90 percent of Florida's schools as failing schools in 2010-11 would provide a very misleading assessment of the condition of public education in Florida.

Florida's New AMOs are Ambitious, Meaningful Measures of School and Student Progress

One of the reasons that Florida is proposing new AMOs is to incorporate annual performance objectives that are both ambitious and achievable. Further, Florida's AMOs streamline the federal and state accountability systems into one rigorous, cohesive system that increases standards and holds schools, LEAs, and the state accountable for the achievement of all students including those that are struggling the most. Because Florida's AMOs are part of the School Grades system classifications that determine financial rewards and what actions schools and LEAs must take to improve student achievement, the new AMOs will be more meaningful and consistent measures of academic progress for Florida's schools and students.

Florida's School Grades system has been driving large increases in student success for over a

decade, while continuing to evolve into an even more rigorous system over time. Florida is currently poised to increase the rigor of the system yet again in 2012. Florida's school grading system focuses 50% of its assessment components on student performance and 50% on student learning gains. In addition, to the student assessment components, the high school grading system also includes measures that focus on ensuring that students are ready for college or careers. Florida's grading system also ensures that schools focus their efforts on achieving learning gains for the most struggling students. Learning gains for the most struggling students are captured in multiple measures so these students become very important to Florida schools and LEAs in the School Grades model. Florida's School Grades system is described in more detail in Section 2.A.i of this request.

We are proposing four AMOs to provide a more robust and comprehensive picture of student performance within the school, LEA, and state. As achievement targets, the new AMOs will be reported as parts of a comprehensive, compensatory accountability system for evaluating a school's academic status and progress; the new AMOs will not have the same "all or nothing" impact on the overall school performance outcome as with the prior AMOs used in AYP reporting. Outcomes on the new AMOs will be reported on the annual state/LEA/school report cards.

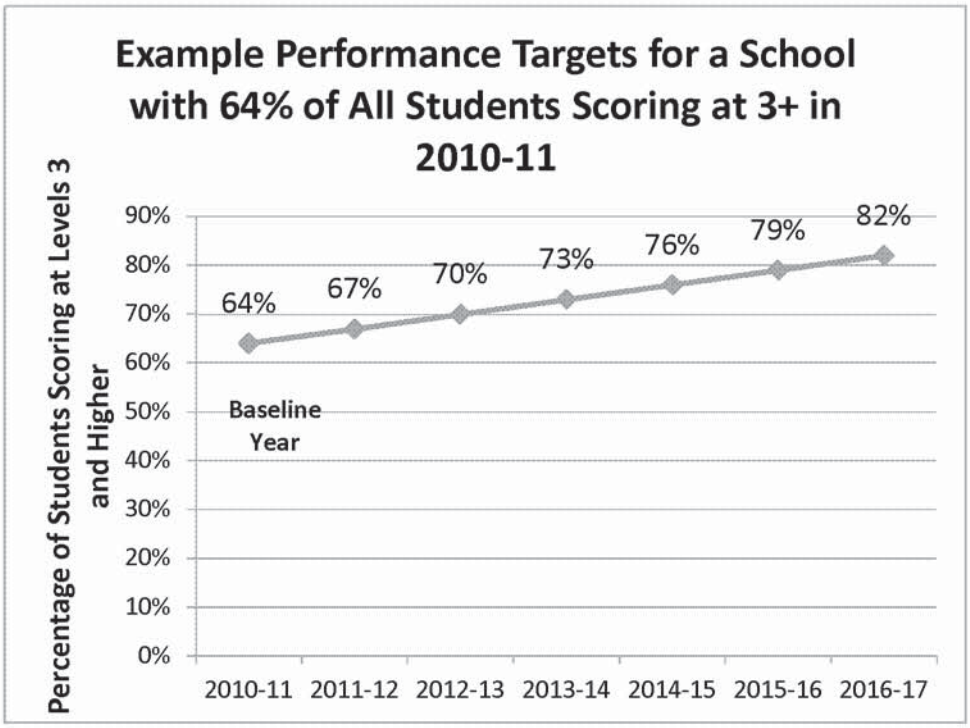
Definition of New AMOs

- **AMO-1, School Performance Grade Target.** Each school in Florida strives to achieve an "A" school grade. A school grade of "A" brings financial rewards and flexibilities to the school. School grades are also important metrics that local communities and business leaders focus on. LEAs and schools work diligently to improve their school grades.

  The school grade is selected as the first AMO in order to provide a comprehensive overview of the performance of the school that includes the student performance and progress of all students including subgroups. A school cannot achieve an "A" school grade, even if it has high levels of students performing on grade level, unless it focuses on learning gains for its most struggling students. School grades are assigned to each Florida school to meet the public reporting requirements of Section 1008.34, Florida Statutes. A description of school grading components is provided online at http://schoolgrades.fldoe.org/pdf/1011/Guidesheet2011SchoolGrades.pdf.

- **AMO-2, Reading and Math Performance Target**. This AMO sets targets for each school and subgroup in Florida to increase the proportion of students scoring at level 3 and above and reduce the proportion of students scoring at levels 1 and 2 by 50%. All schools and subgroups within the school will be evaluated to determine whether they meet their individual annual targets for performance in reading and math. AMO targets will be established separately for each subgroup and all students, and will be calculated at the school, LEA, and state levels. The AMO targets will be used to determine whether the subgroups (as well as the "all students" group) are making progress in the current year to be on track to reduce the percentage of level 1 and level 2 students by half by 2016-17 (using 2010-11 as the baseline year). The graph below provides an example of the "all students" subgroup target that would be established for a school that had 64% of its students scoring at levels 3 and higher. In addition to the performance target,

eligible subgroups would be able to meet the criteria through the current Safe Harbor provision.



Example, Performance Target Calculation

- Sample Elementary School: 2010-11 percent scoring at level 3 or higher in mathematics = 64% (All Students)
- 50 percent of students scoring levels 1 and 2 = 36% x ½ = 18%
- Target for 2016-17 = 64% + 18% = 82%

Sample Elementary School

In 2010-11, 64% scored at level 3 or higher in mathematics
Target: Increase level 3 and higher rate to 82% in 2016-17

Target for 2011-12	67% = 64% + [(18% ÷ 6) x 1]
Target for 2012-13	70% = 64% + [(18% ÷ 6) x 2]
Target for 2013-14	73% = 64% + [(18% ÷ 6) x 3]
Target for 2014-15	76% = 64% + [(18% ÷ 6) x 4]
Target for 2015-16	79% = 64% + [(18% ÷ 6) x 5]
Target for 2016-17	82% = 64% + 18%

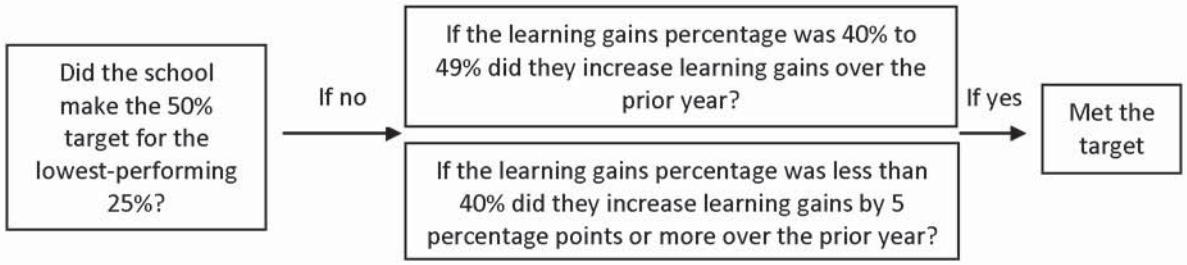
Schools and subgroups that have 95% of students scoring at level 3 or higher will meet the state's high-performing target, which meets Florida's AMO requirement without the requirement for annual improvement. This allows high-performing schools and subgroups to meet the AMO requirement without having to show improvement over

the prior year.

Florida will report for each subgroup at the school whether the target was met, whether the school has improved but has not met the target, or whether the subgroup's performance has maintained or declined. Subgroups categorized as improving have increased the percentage of students scoring level 3 or higher while the subgroups categorized as maintained/declined have not increased the proportion of students scoring level 3 or higher.

- **AMO-3, Target for Progress of Students in the Lowest-Performing 25%.** This target is calculated separately for both reading and mathematics and is based on the percentage of students in the lowest-performing quartile who made learning gains in the assessed subject areas. Students are counted as making learning gains if they increase their Achievement Level, maintain a level of 3 or higher, or for students in levels 1 and 2, if they make more than a year's worth of learning gains. Schools must show that 50% of students in the lowest-performing group (lowest 25%) have made learning gains. If a school falls short of this target in either subject area, the school can still meet the requirement by showing improvement in the learning gains percentage from one year to the next (see exhibit below).

Florida's Learning Gains Target for the Lowest-Performing 25% of Students



In addition to using this target as an AMO, it also has consequences for a school's grade. Schools that would otherwise be graded "C" or higher that do not meet this requirement are assigned a final school grade that is one letter grade lower than the school would have received based on the school grade points earned. This provides schools an added incentive to focus efforts on helping the most struggling students improve their academic performance.

Several factors heavily influenced the selection of this measure as a new AMO:

- Florida's most populous minority subgroups, students with disabilities, and its economically disadvantaged subgroup are heavily represented in the lowest-performing 25% grouping of the state's school grading calculations.
- The state's School Grades system, as required in governing statute and rule, must place additional emphasis on academic achievement of the lowest-performing students. This additional emphasis is quantified in the form of school grading points for learning gains of students in the lowest-performing 25% and in the progress target for the lowest-performing 25%.
- Using the lowest-performing 25% solves one of the main difficulties of using the

performance of individual subgroups in accountability systems. When looking at individual subgroups many schools do not have enough students in each subgroup for each subgroup's performance to count in the accountability system. This may lead schools to focus on those subgroups that do make a difference to their accountability rating instead of all students that are performing at low levels. By bringing the subgroups together into the lowest-performing 25%, Florida schools and LEAs will focus on the students most in need of assistance.

The focus on the lowest-performing 25% is at its foundation a way of addressing the concern that students from certain subgroups are more likely than others to be lower performers, and that instructional efforts should always be appropriately directed toward students in most need of assistance and improvement. AMO-2 supports this aim by providing a real incentive in the school grading formula for aligning instructional resources to focus on low performers, and in so doing rewards schools and LEAs that are successful in reducing achievement gaps. The table below shows that the subgroups with the lowest achievement are over represented in the lowest-performing 25% subgroup.

2010-11 Subgroup Representation in Overall Student Population vs. Lowest-Performing 25%

	Mathematics		Reading	
Subgroup	**Percent of Lowest-Performing 25%**	**Percent of the Rest of the Students**	**Percent of Lowest-Performing 25%**	**Percent of the Rest of the Students**
All Students	100%	100%	100%	100%
Asian	≤ 5%	≤ 5%	≤ 5%	≤ 5%
African-American	31%	22%	29%	22%
Hisp□ nic	31%	28%	31%	28%
American Indian	≤ 5%	≤ 5%	≤ 5%	≤ 5%
White	34%	44%	35%	44%
Students with Disabilities	27%	12%	28%	12%
English Language Learners	15%	11%	16%	11%
Economically Disadvantaged	70%	57%	69%	57%

Sources: Florida School Grades compiled records for 2010-11 and October Membership data reported on the 2010-11 School Public Accountability Reports, Florida Department of Education.

2010-11 Subgroup Composition of the Lowest-Performing 25% of Students

	Mathematics		Reading	
Subgroup	Percent of Lowest-performing 25%, Math	Percent of Lowest-performing 25% Making Gains	Percent of Lowest-performing 25%, Reading	Percent of Lowest-performing 25% Making Gains
All Students	100%	67%	100%	60%
Asian	≤5%	76%	≤ 5%	66%
African-American	31%	65%	29%	56%
Hispanic	31%	68%	31	61%
American Indian	≤ 5%	65%	≤ 5%	59%
White	34%	68%	5%	63%
Students with Disabilities	27%	61%	28%	53%
English Language Learners	15%	9%	1□ %	60%
Economically Di□ advantaged	70%	16%	□ 9%	58%

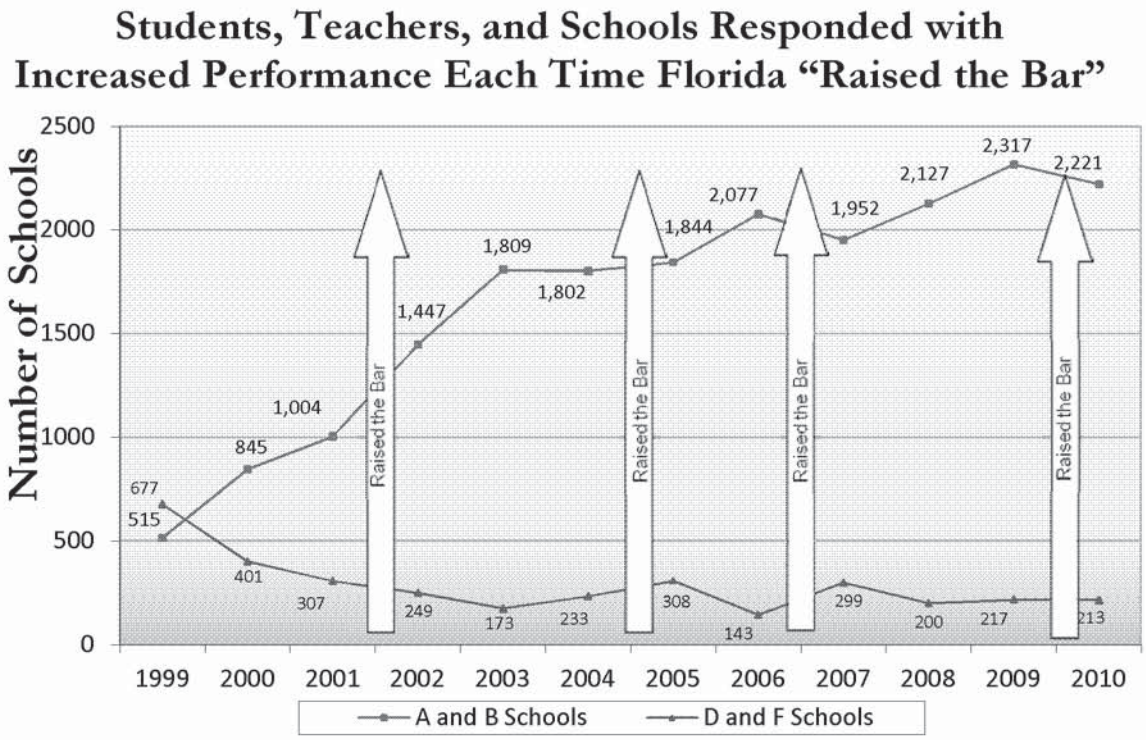
Note: Students are counted as making learning gains if they increase their Achievement Level, maintain a level 3 or higher, or for students in levels 1 and 2, if they make more than a year's worth of learning gains.
Source: Florida School Grades compiled records for 2010-11, Florida Department of Education.

- **AMO-4, Benchmark Florida's Student Performance to the Highest-Performing States and Nations.** This is a statewide target that compares Florida's student performance (% proficient) on NAEP, TIMSS, PIRLS, and PISA compared to the highest-performing states and nations. Florida's target is to attain the same achievement levels as the top five states on NAEP and the top ten nations on TIMSS, PIRLS, and PISA. This AMO is designed to keep Florida moving forward toward national and international competitiveness. This will make sure that Florida is benchmarking its progress not only within the state but externally to achieve the highest levels of performance and increase Florida's competitiveness nationally and internationally.

Florida's Rationale for Selecting These AMOs

Florida selected its AMOs to ensure that its strong, successful, statewide accountability system drives student achievement in the future, eliminating the confusion caused by having more than one accountability system for schools. This selection of AMOs and Florida's enhanced School Grades system provides for a more cohesive and more rigorous system to identify high-performing and significantly improving schools as well as schools that are struggling and need support. Florida has a history of raising the bar in its accountability system and intends to continue that track record. Florida is committed to continuous monitoring of student achievement for all students and subgroups to ensure that all struggling students increase their performance and that high-achieving students also increase their performance. Florida will continually assess its accountability system in light of student achievement of all students and subgroups to determine whether changes need to occur to ensure that all students are moving forward. Florida is working to raise the bar for all students and subgroups across the spectrum to ensure that students are working to meet and attain rigorous college- and career-ready

standards and the school accountability system is a strong tool to help Florida students reach those goals.



School Grades Distribution for High- and Low-Performing Schools

Key for "Raising the Bar" arrows:

- *1st arrow: Florida implemented learning gains components in reading and mathematics after expanding the FCAT from three grades tested in reading and mathematics to all grades tested from grade 3 through grade 10.*
- *2nd arrow: Florida expanded the included student population to incorporate scores for students with disabilities and English language learners on the FCAT, and increased the writing standard for proficiency from 3.0 to 3.5.*
- *3rd arrow: Florida added FCAT Science to school grade performance measures and added learning gains for the lowest-performing 25% in mathematics.*
- *4th arrow: Florida expanded its high school grading measures to include overall and at-risk graduation rates, accelerated coursework, and readiness for college and careers.*

Reporting New AMOs on Annual State Reports (Examples of Tables)

The following sets of tables show how the new AMOs will be reported on the annual state/LEA reports (Florida's School Public Accountability Reports [SPARs]) in compliance with the ESEA. Each AMO will be reported for all students and individually for each subgroup. The chart indicates whether the school met the target and the percentage of students that made the required progress or achievement. Florida will use these reports to monitor the progress of all students and each subgroup to identify areas that may need more focus. The following tables show an example school-level table, an LEA-level table, and a statewide table.

Progress Toward AMOs (School-Level Report):

Progress Toward Annual Measurable Objectives
Sample High School

	School Grade	Performance Progress Reading					Performance Progress Math					Did the School Meet Target for Low 25%, Target for Reading? (Y/N)	Did the School Meet Target for Low 25%, Target for Math? (Y/N)
		Percent Scoring Level 3 or Higher	Target	Met target	Improving	Maintaining or declining	Percent Scoring Level 3 or Higher	Target	Met target	Improving	Maintaining or declining		
All Students													
American Indian or Alaska Native													
Asian													
Black or African-American													
Hispanic													
White													
Students with Disabilities													
Economically Disadvantaged													
English Language Learners													

Progress Toward AMOs (LEA/District-Level Report)

Progress Toward Annual Measurable Objectives Sample LEA													
	District Grade	Performance Progress Reading					Performance Progress Math					Did the District Meet Target for Low 25%, Target for Reading? (Y/N)	Did the District Meet Target for Low 25%, Target for Math? (Y/N)
		Percent Scoring Level 3 or Higher	Target	Met target	Improving	Maintaining or declining	Percent Scoring Level 3 or Higher	Target	Met target	Improving	Maintaining or declining		
All Students													
American Indian or Alaska Native													
Asian													
Black or African-American													
Hispanic													
White													
Students with Disabilities													
Economically Disadvantaged													
English Language Learners													

Progress Toward AMOs (State-Level Results, by School Type)

Progress Toward Annual Measurable Objectives Sample Middle School State Level Report													
	Performance Progress Reading					Performance Progress Math					Did the State Meet Target for Low 25%, Target for Reading ? (Y/N)	Did the State Meet Target for Low 25%, Target for Math? (Y/N)	Did the State Meet the Performance Target of the Highest Performing States and Nations?
	Percent Scoring Level 3 or Higher	Target	Met target	Improving	Maintaining or declining	Percent Scoring Level 3 or Higher	Target	Met target	Improving	Maintaining or declining			
All Students													
American Indian or Alaska Native													
Asian													
Black or African-American													
Hispanic													
White													
Students with Disabilities													
Economically Disadvantaged													
English Language Learners													

Florida's School Public Accountability Reports (SPARs) fulfill requirements for reporting all elements in the state, LEA, and school annual report cards under provisions of ESEA. The SPARs are available at http://doeweb-prd.doe.state.fl.us/eds/nclbspar/index.cfm.

2.C REWARD SCHOOLS

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

Florida proposes to use the established Florida School Recognition Program, described below, to identify high-performing schools and schools that have demonstrated improved student performance by at least one grade. Reward schools comprise all schools graded "A" and schools that improve one or more grade levels over the prior year. The state has different school grades release timelines for elementary/middle schools and high schools due to lagged measures for high schools. For the purpose of this calculation the state used the 2010-11 school grades for Elementary/middle schools and the 2009-10 school grades data for high schools. Using this data the state has identified 1,975 schools that meet the Reward criteria.

Florida School Recognition Program

Florida has long acknowledged the need to recognize schools that are high-performing and have demonstrated significant improvement. To this end, in 1999 the State Legislature established the Florida School Recognition Program to reward high and improved school performance based on school grading. As authorized by Florida law (Section 1008.36, Florida Statutes) the Florida School Recognition Program provides greater autonomy and financial awards to schools that demonstrate sustained or significantly improved student performance. Schools that receive an "A" grade and/or schools that improve at least one performance grade category are eligible for school recognition funds. Funds for the Florida School Recognition Program are appropriated annually by the State Legislature. In 2010-11, the amount distributed was $119,858,088; equivalent to $75 per full-time equivalent (FTE) for each qualifying school. The staff and School Advisory Council at each recognized school jointly decide how to use the financial award. As specified in law, schools must use their awards for one or any combination of the following:

- Nonrecurring faculty and staff bonuses
- Nonrecurring expenditures for educational equipment and materials
- Temporary personnel to assist in maintaining or improving student performance

Additional information on the Florida School Recognition Program is available online at http://www.fldoe.org/evaluation/schrmain.asp.

2.C.ii Provide the SEA's list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

In addition to the financial rewards described above for the Florida School Recognition Program, additional public recognition of these schools includes, but is not limited to, posting on the FDOE's website; press releases by the Governor, Commissioner of Education, and/or school superintendent; and recognition by the State Board of Education, local school boards, and/or the local Chamber of Commerce.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

F Schools = Priority/Intervene Schools

Florida proposes that schools that receive a school grade of "F" will be assigned to the Priority/Intervene status. Florida schools in Priority/Intervene status are subject to more intensive intervention efforts required by the FDOE and managed (initially) by the LEA. Schools that receive a grade of "F" are the schools that need the most support to improve student achievement and student learning gains for all students and students within each subgroup.

Most Recent School Grades to Identify Schools in Table 2

Florida has two distinct timelines for the release of schools grades. Elementary and middle school grades are released in July of each year. High school grades are released in December due to the inclusion of other lagged measures including Advanced Placement, Dual Enrollment, and graduation rate. As a result of the timelines the FDOE used the most recent complete school grade data available to populate Table 2 (Attachment 9). For elementary and middle schools the school grade data reflects performance during the 2010-11 school year. However, high school grade data reflects the 2009-10 School Grades.

Based upon this information, there are 35 schools that would qualify for the Priority/Intervene school designation. This number reflects 2% of the state's Title I schools.

2010-2011 School Grades
Florida is currently in the process of revising its school grading calculations. The state's simulation using the proposed FCAT 2.0 cut scores indicates that the Priority/Intervene schools category would include 112 schools, reflecting 6% of all Title I schools in the state's current accountability system if these results had been used to recalculate Florida's 2010-2011 School Grades. See page 117 for a summary by school type.

2.D.ii Provide the SEA's list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

The state's DA process establishes criteria for ensuring that LEAs/schools comply with the turnaround principles. Specifically, the regional teams, as part of their instructional monitoring process, currently use the District and School Compliance Checklists as well as the Strategies and Support Document (Attachment 12) to ensure that these principles are being followed (these documents will be revised to reflect the provisions described below). These principles are outlined in Section 2.G.

In order to maximize the ability of a school assigned to Priority/Intervene status to make dramatic, systematic change, the interventions themselves must be appropriate, implementation must be faithful, and oversight strong and fair. Florida can demonstrate its history with each of these components. Florida has five Regional Executive Directors assigned to assist and oversee turnaround implementation by LEAs and schools. LEAs that have a number of Priority/Intervene schools must also have a dedicated turnaround director. The State Board of Education reviews and approves or disapproves LEA plans for Priority/Intervene schools. The focus on Priority/Intervene schools in Florida is such that during the 2011 calendar year, in six of the eight State Board of Education meetings, Priority/Intervene schools were on the agenda for review.

The interventions for Priority/Intervene schools are found in Section 1008.33, Florida Statutes, and Rule 6A-1.099811, Florida Administrative Code.

As described below, LEAs that have a Priority/Intervene school are required to conduct a diagnostic needs assessment and submit a plan for review and approval by the State Board of

Education. This plan must demonstrate that it will result in systematic change and includes seven areas: school improvement planning, leadership quality improvement, educator quality improvement, professional development, curriculum alignment and pacing, the Florida Continuous Improvement Model, and monitoring plans and processes (Rule 6A-1.099811(5), Florida Administrative Code).

In order to assist the USDOE peer reviewer, the elements of the plan as well as other interventions aimed at achieving systematic change are set forth below in the sequence found in the review guidance. FDOE anticipates that if this flexibility is granted, interventions and support addressing each of the areas listed below will remain in place; however, the support strategies themselves may evolve to better serve struggling schools and LEAs.

School Leadership

An LEA with a Priority/Intervene school is required to replace the principal, all assistant principals and coaches unless assigned to the school for less than one year where the school is a district-managed turnaround school. If the school is managed by an outside entity or as a charter school, the principal must have experience in turning around a low-performing school and the principal, assistant principals, and coaches from the Priority/Intervene school may not be hired at the school unless assigned to the school for less than one year and the school's failure to improve cannot be attributed in whole or in part, to the individual (Rule 6A-1.099811(8), Florida Administrative Code). Additionally, as part of the support and interventions provided to LEAs with a Priority/Intervene school, the LEA is required to submit a plan to FDOE for approval. That plan must include the following elements on school leadership:

1. The school's principal and assistant principals must have a record of increasing student achievement. The principal must have a record of turning around a similar school. The SEA has developed a leadership preparation program. The primary objective of this program is to create a pool of promising candidates to lead the chronically low achieving schools. This is described in Section 2.G.
2. The LEA must review members of the school leadership team and replace them as necessary based upon overall school performance. The review and replacement process must be fair, consistent, transparent, and reliable.
3. The LEA, with FDOE assistance, will review the school leadership team. FDOE will make recommendations to the LEA with respect to replacing members of the leadership team. The review and replacement process must be fair, consistent, transparent, and reliable.

Operating Flexibility

An LEA's plan for Priority/Intervene schools must:

1. Give the school sufficient operating flexibility, such as staffing decisions, calendars/time, and budgeting to implement fully a comprehensive approach to substantially improve student achievement outcomes and increase high school graduation rates.
2. Provide ongoing, intensive technical assistance and related support from the LEA, the SEA, or a designated external lead partner organization, such as a school turnaround organization or Education Management Organization (EMO). The plan must identify the partner(s) and provide the qualifications of each in providing support to low-performing schools.
3. Adopt a new governance structure, which may include, but is not limited to:

- Requiring the school to report to a new "turnaround office" in the LEA or SEA.
- Appointing a "turnaround leader" that the principal reports to and who reports directly to the superintendent.
- Entering into a multi-year contract with the LEA or SEA to obtain added flexibility in exchange for greater accountability.

Florida's interventions provide flexibility in scheduling, staffing, curriculum, and budget once the Priority/Intervene school is turned over to a charter entity. One of the key purposes of charter schools is to encourage the use of innovation. In order to allow for innovation and flexibility, charter schools are exempted in law from most of the statutes and rules that apply to other schools. Except for laws that address student assessment; school grading; the provision of services to students with disabilities; and health, safety, welfare, and civil rights, charter schools are not bound by the requirements the educational code (Section 1002.33(16), Florida Statutes). Therefore, not only is the principal given operational flexibility, the entire school is provided a wide degree of flexibility in order to affect systematic change.

Effective Teachers

In order to ensure that teachers in Priority/Intervene schools are able to improve instruction, when the Priority/Intervene school is district-managed, the LEA is required to employ a reliable system to reassign or replace the majority of the instructional staff whose students' failure to improve can be attributed to the faculty. Reading and mathematics teachers may not be rehired at the school unless they are highly qualified and effective instructors under Section 1012.05, Florida Statutes, and as evidenced by 65% or more of their students achieving learning gains in reading and mathematics for elementary teachers and the appropriate content area for middle and high school teachers. These same requirements apply when the Priority/Intervene school is managed as a charter school or by an outside educational entity (Rule 6A-1.099811(8), Florida Administrative Code). Further, the LEA plan for Priority/Intervene school must include the following related to teacher quality and school staffing:

1. The LEA may not employ teachers for the school who are designated less than satisfactory by the teacher evaluation instrument. Florida has several Race to the Top projects that focus on developing quality teachers.
2. The LEA must develop a plan to encourage teachers and instructional coaches to remain or transfer to lower-performing schools based on increasing learning gains by 65% or greater in reading and mathematics. The plan must be fair, consistent, transparent, and reliable.
3. The LEA must provide a reading coach, mathematics coach, and science coach to develop and model effective lessons, to lead Lesson Study, to analyze data, and provide professional development on the Common Core State Standards/Next Generation Sunshine State Standards.
4. The LEA must ensure that performance appraisals of instructional personnel are primarily based on student achievement. The appraisals must be fair, consistent, transparent, and reliable.
5. The LEA must ensure that performance appraisals of the administrative team include student achievement, as measured by the FCAT, as well as goals related to targeted subgroups and school-wide improvement.
6. The LEA must train staff on performance appraisal instruments and ensure that the performance appraisal process is implemented.

7. The LEA must provide teachers with performance pay for raising student achievement. The performance pay system must be fair, consistent, transparent, and reliable.
8. The LEA, with assistance from FDOE, must review and replace teachers who have not contributed to increased learning gains of 65% or greater in reading and mathematics or those teachers who did not contribute to improving the school's performance. The review and replacement process must be fair, consistent, transparent, and reliable.
9. The LEA must implement a differentiated pay policy that includes differentiation based on LEA-determined factors, including but not limited to additional job responsibilities, school demographics, critical shortage areas, and level of job performance difficulties. The policy must be fair, consistent, transparent, and reliable.
10. The LEA must ensure that mid-year vacancies are filled.

In order to ensure that job-embedded professional development occurs and that the development is tied to teacher and student needs, an LEA's plan for a Priority/Intervene school must include the following:

1. The LEA must ensure that Individual Professional Development Plans for teachers of targeted subgroups include professional development that targets the needs of subgroups.
2. The LEA must participate in a sample of meetings where Individual Professional Development Plans are developed.
3. The LEA must ensure that leadership professional development opportunities target the needs of subgroups.
4. The LEA must provide professional development opportunities for school administrators that target the specific needs of subgroups.
5. The LEA must ensure that appropriate resources are provided to redesign the master schedule to allow for common planning time for data-based decision making within the problem-solving process, job-embedded professional development on the Common Core State Standards/Next Generation Sunshine State Standards, and Lesson Study. The LEA must ensure that appropriate resources are allocated to redesign the master schedule. The LEA will ensure that more time for teachers to collaborate, plan, and engage in professional development within and across grades and subjects. Common planning time must be established within the master schedule to allow grade level meetings to occur daily in elementary schools and by subject area at the secondary level. It must be scheduled so that all grade level and subject area teachers participate at the same time and include Lesson Study. If the master schedule prevents this from occurring, the LEA must establish a weekly Lesson Study after school for a minimum of one hour a week on the same day.
6. The LEA must provide principals and assistant principals with professional development on monitoring classroom instruction and guiding/supporting/monitoring the activities of instructional coaches.
7. The LEA must provide professional development on Florida's Continuous Improvement Model, Common Core State Standards/Next Generation Sunshine State Standards, Response to Intervention, Lesson Study, and School Grade and AMO Calculations.
8. The LEA must create and maintain a pool of highly-qualified reading, mathematics, and science teachers and instructional coaches to serve in DA schools.
9. The LEA must offer a summer professional development academy that is developed in conjunction with FDOE to school administrators, teachers, and instructional coaches. The LEA is also required to partner with the regional team to encourage school administrators, teachers, and instructional coaches to participate in the DA Summer Academies.

Additional Time for Learning and Collaboration

Florida strongly believes in extending the instructional day, week, and year as a strategy to increase student achievement. Florida provides Supplemental Academic Intervention (SAI) funding initially based on the number of students needing an extended school year program. These funds are provided to all LEAs prior to the beginning of each school year allowing schools to establish academic intervention programs at the moment students begin to struggle with subject content. This system of addressing the needs of students immediately, rather than waiting until students fail a course and take it again during an abbreviated summer session, has proven to be highly effective in reducing students below grade level. In addition to SAI funds, schools have access to School Improvement and Title I funds to extend the instructional time. Lastly, School Improvement Grant (SIG) funds are provided to the lowest-performing 5% of schools in the state and each school is required to develop and have approved a detailed improvement plan that must include the extension of the instruction day and common teacher planning time. All LEAs are required to offer summer reading camps for struggling 3rd grade readers who have scored below level 3 on grade 3 FCAT reading. With the use these funds, Florida's lowest-performing schools conduct intensive summer programs to reduce or eliminate the regression of student learning that takes place over the summer, especially for students who live in poverty. There is also a strong commitment to extend the instructional day through the use of instructional technology at the family's home. This strategy has proven effective, especially for English language learners. Florida is highly committed to providing increased instructional time and practice to all struggling students.

In order to provide additional time for student learning, a Priority/Intervene school must extend the learning day. Additionally, the LEA must ensure that its master schedule is redesigned to allow for common planning time for teachers.

Instructional Programs are Based Upon Student Needs and Aligned with Common Core State Standards

The LEA plan for Priority/Intervene schools requires the following:

1. The LEA or school must develop instructional pacing guides that are aligned to the Common Core State Standards/Next Generation Sunshine State Standards in reading, writing, mathematics, and science.
2. The LEA must develop and implement a comprehensive research-based K-12 reading plan funded by the state. The plan must be updated annually based on Section 1011.62, Florida Statutes.
3. The LEA must review data to determine the effectiveness of all instructional programs and class offerings.
4. The LEA must extend the learning day.
5. The LEA, through the District Improvement Assistance Plan (DIAP), must clearly demonstrate how it is aligning its initiatives and resources based upon its school needs.
6. The LEA must identify the new or revised instructional program for reading, mathematics, science, and writing; the research base that shows it to be effective with high-poverty, at-risk students; and how it is different from the previous instructional program.
7. The LEA must provide the decision-making process for determining the new or revised instructional program.
8. The LEA must provide the rationale, including data, which supports retaining the current

instructional program for reading, mathematics, science, and writing, respectively; or revising or adopting a new program.

Data Informs Instruction

The LEA plan for Priority/Intervene schools must include the following elements:

1. The LEA must monitor implementation of Florida's Continuous Improvement Model (FCIM).
2. The LEA must ensure real-time access to student achievement data.
3. The LEA must prescribe interim (benchmark baseline, mid-year, and mini-) assessments in reading, writing, mathematics, and science for level 1-3 students.
4. The LEA will use the Problem Solving/Response to Intervention process to analyze progress monitoring data in reading, writing, mathematics, and science through interim assessments to inform instruction. In the area of reading, this requirement maybe fulfilled through the use of the Florida Assessments for Instruction in Reading.
5. The LEA must participate in the Florida Assessments for Instruction in Reading for level 1-3 students.
6. The LEA administration must ensure that data chats are conducted between LEA administration and school administration, school administration and teachers, and teachers and students following baseline, mini-, and mid-year assessments.
7. Promote the continuous use of student data to meet the academic needs of individual students through implementation of the FCIM to:
    - Inform instruction – describe the interim and summative assessments that will be used, the frequency of such assessments, how the data will be analyzed, and how changes in instruction will be monitored.
    - Differentiate instruction – describe how instruction will be differentiated to meet the individual needs of students and how such differentiation will be monitored and supported. Include strategies for push-in, pull-out, or individual instructional opportunities.
    - Describe the specific training and follow-up that will be provided to support the implementation of the FCIM.

Non-Academic Factors Affecting Student Achievement

In order to sustain a school that supports positive student performance outcomes a school must first create an atmosphere that is safe and conducive to teaching and learning. DA incorporates into its improvement processes non-academic factors that are known to impede the development of a positive school culture.

The integrated statewide Problem-solving/Response to Intervention (PS/RtI) and Florida's Positive Behavior Support: RtI for Behavior (FLPBS:RtIB) programs collaborate to provide direct support to LEAs via the District Action Planning and Problem-solving Process. This process consolidates LEA leadership team efforts to use multiple data sources in the systematic planning and problem-solving process to implement a Multi-tiered System of Support for the various initiatives for which there is evidence that student learning is impacted. The Multi-tiered System of Support features timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in

Priority/Intervene and Focus/Correct schools, including:

- Alignment of teacher and school leader evaluation data (on instructional and leadership practices) with professional development.
- Development of state minimum standards for local LEA data systems related to curriculum, instructional practice, assessment, and professional learning.
- Revision (in progress) of the state's principal leadership standards to focus on student results and research-based instructional leadership practices.
- Ongoing revisions of State Board of Education rules to align with federal support for a multi-tiered, data-driven system of identification and service to students with disabilities in need of specially designed instruction.
- Integrated technical assistance in the form of regional trainings, monthly calls, technical assistance papers, web-based tools, and a guidance manual for meaningfully compliant implementation of State Board of Education rules that require use of a data-based problem-solving process (see http://www.fldoe.org/ese/sldr.asp for more information).
- Formal technical assistance products that include an online Introductory RtI Course (taken by over 8,000 educators and other stakeholders), a statewide implementation plan for a PS/RtI implementation over a three-year period, mathematics and science model lesson videos that integrate PS/RtI with standards-based instruction, parent videos and presentations, brochures to address specific needs related to using data-based problem-solving within the Multi-tiered System of Support, and many others that can be accessed at the statewide web site: http://florida-rti.org/.
- Multi-year, ongoing FDOE-funded and supported collaborative training and technical assistance projects and their websites, including PS/RtI at http://floridarti.usf.edu/, which provides supportive research and resources such as the Evaluation Tool Technical Assistance Manual and newsletters, and FLPBS:RtIB at http://flpbs.fmhi.usf.edu/, which provides training modules and Florida's Model PBS Schools and has generated over 6,000,000 hits.
- Development of *Guiding Tools for Instructional Problem-solving (GTIPS)*, a manual used by LEAs and schools to establish and support implementation of data-based planning and problem-solving for instructional decision making, available at http://florida-rti.org/_docs/GTIPS.pdf.

The DIAP and School Improvement Plans must incorporate non-academic factors including:

- Retention rates/Acceleration programs
- Discipline rates (in-school and out-of-school suspension rates by incident type)
- Drop-out prevention
- PS/RtI team member identification and meeting schedules
- Attendance rates
- Implementation of PBS system

Family and Community Engagement

As part of improvement planning, the LEA is required to recruit representatives of the community to establish a Community Assessment Team (CAT) to review school performance data, determine the cause for low performance for each Priority/Intervene school, and advise the LEA on its District Improvement and Assistance Plan. To enhance the mechanisms for engagement, FDOE Regional Executive Directors are required to participate in CAT meetings. Additionally, the school is required to offer a flexible number of meetings for parents and in order to improve engagement, these meetings must be held at convenient times for parents. Schools are required to document all such meetings and maintain a log of parental involvement in order to demonstrate their efforts to engage the community of stakeholders. For Priority/Intervene school, the state requires that the LEA demonstrate ongoing community involvement in the review of the school's performance and in the selection of the turnaround option.

Oversight and Monitoring

In order to ensure that the interventions are sustained and result in systematic change in Priority/Intervene schools, significant school improvement planning and monitoring occurs at the LEA level and monitoring occurs at the state level. Included in the LEA plan for these schools are the following school improvement planning activities:

1. The LEA must create a LEA-based leadership team that includes the superintendent, associate superintendent(s) of curriculum, general and special education leaders, curriculum specialists, behavior specialists, student services personnel, human resources and professional development leaders, and specialists in other areas relevant to the school's circumstances, such as assessment, English language learners, and gifted learners.
2. The LEA team shall develop, support, and facilitate the implementation of policies and procedures that guide school-based teams with direct support systems for each school.
3. The LEA team must establish systems for PS/RtI through LEA-wide consensus building, infrastructure development, and implementation.
4. The LEA-based leadership team must monitor the implementation of the school improvement plan.
5. The LEA is required to recruit representatives of the community to establish a Community Assessment Team (CAT) to review school performance data, determine the cause for low performance for each school in the Priority/Intervene category, and advise the LEA on its District Improvement and Assistance Plan. The FDOE's Regional Executive Directors shall participate in CAT meetings.
6. The LEA must develop and implement a District Improvement and Assistance Plan.

The LEA's monitoring responsibilities include the following:

1. The LEA must develop a comprehensive instructional monitoring process and follow-up that includes classroom, school leadership team, and school-wide monitoring.
2. The LEA must ensure that schools demonstrating the greatest need, based on data analysis, receive the highest percentage of resources.
3. Monthly LEA meetings with the Regional Executive Director and LEA department leaders are held to coordinate strategies and resources to assist lowest-performing schools.
4. The LEA must establish a position to lead the turnaround effort at the LEA level. The selected employee will report directly to the superintendent and directly supervise principals

at the lowest-performing schools.

The monitoring and reporting that occurs at the state level includes monthly progress monitoring meetings between the DA regional team, LEA, and schools. Additionally, the Regional Executive Director provides a summary of the status of both the school and LEA compliance checklists for areas where there is failure to adequately meet the compliance requirements. In instances where either the school or LEA fails to comply with a required component the LEA and/or school will be required to submit an action plan, in time for the next State Board of Education meeting, detailing the steps it will take in order to meet the required elements. Should the school and/or LEA fail to adequately address the deficiency the State Board of Education may require the superintendent to outline their barriers and revised actions steps at a subsequent State Board of Education meeting.

The FDOE also requires the submission of the selected Intervene Option Plan from the four turnaround models in state law for approval by the State Board of Education. Once approved the LEA will submit a second plan detailing the actual steps toward implementation of their approved plan. This plan includes specific deliverables to ensure that the LEA is working toward implementation of their approved plan. Deliverables include, but are not limited to, evidence of stakeholder engagement during the intervention model selection process, identification of possible external partners, research on selected programs/partnerships, copies of correspondence, and a timeline for transition. Finally, in August of each year, the LEA must submit a final plan that reflects the actual implementation of their approved plan.

The interventions noted in this section are currently in place. While they may evolve to better serve students and LEAs, interventions and support addressing each area will remain in place, should Florida's flexibility request be granted.

The practices that are currently being implemented to improve the quality of instruction and the effectiveness of leadership and teaching in Priority/Intervene schools are found above.

Under the proposal for an enhanced DA system, Priority/Intervene schools could implement interventions for four years. The school would automatically have two years to implement intervention strategies and could have another two years, in a hold status, if the school improved to a grade of "D" or improved enough to meet achievement targets in mathematics and reading. After that, the LEA is required to choose a new option from those in law and submit a new Intervene Option Plan. Beyond the four years to implement an option, an LEA could continue the option and interventions if they demonstrated to the State Board of Education that the school is likely to improve enough to exit the Priority/Intervene category with more time (this is currently a provision in Section 1008.33(5)(b), Florida Statutes).

If a Priority/Intervene school improves enough to earn a "C" grade, neither the existing DA system nor the proposal would require a school to continue interventions. Continuing the interventions when a school has attained a "C" grade, while other schools with the same or even lower grades are not required to implement interventions, undermines the entire system in Florida and diverts limited resources away from the students and schools that are in most need of assistance. The system is less understandable and vulnerable to attack by the community and parents. For the DA system to work in Florida, and for LEAs to implement some of the difficult strategies at the local level, it is essential that the community and parents understand and trust in the DA system.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

The timeline below was developed to align required turnaround principles with the availability of student performance data and give the LEA/school adequate time to identify target needs and strategies and allocate resources.

Sample Intervention Timeline for Elementary and Middle Schools (School Year 2011-2012)

- School Grades released July 2011
- Schools are placed in the appropriate DA category and the list is released August 2011
- Review of District Compliance Checklist by Regional Executive Director September/October 2011
- Review of compliance with Strategies and Support Document by the Regional Executive Director September/October 2011
- Submission of compliance summary to State Board of Education (three times annually)
- Intervene Option Plan (Option Selection) Submission November 1, 2011
- State Board of Education Approval November-December 2011
- Intervene Option Plan (Alignment of Strategies and Resources) Submission January-February 2012
    - LEA submission of deliverables, including:
        - Evidence of stakeholder engagement
        - Evidence of communication with an Education Management Organization or Charter
        - Planning timeline toward implementation
- Intervene Option Plan (Implementation) Submission August 1, 2012

As can be seen from the timeline above, under the existing DA system an option (district-managed turnaround or alternative governance through a charter or outside entity) and the accompanying interventions are already in place for many schools. Under the enhanced DA proposal, there would be no delay in implementation of the interventions required for improvement. Further, there would be no concentration of schools in later years because schools would enter, and would have the opportunity to exit, with the release of School Grades yearly. With the release of elementary and middle school grades in July and the release of high school grades in December, the school would have twelve or eight months, respectively, to plan for implementation in August. The proposal allows Priority/Intervene schools to implement an option and accompanying interventions for a two-year period and permits additional time to implement interventions if the school demonstrates improvement in the school grade or in reading and mathematics scores. However, if the school improves enough so that it is no longer categorized as a Priority/Intervene school, it would not be required to continue to implement the interventions required for these low-performing schools. Approval of this request would require modification of state law.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

Because of the need for intervention efforts in Priority/Intervene schools to establish long-lasting (rather than temporary) improvements, Florida's enhanced DA system substantiated by approval of this ESEA Flexibility Request will place additional exit requirements on Priority/Intervene schools beyond simple improvement of the school grade. In order to exit Priority/Intervene status, Florida schools will be required to meet all of the following criteria:

- Improve the school grade to a "C" or higher.
- Improve achievement in reading and mathematics to meet criteria established by Florida's State Board of Education.

Schools in Priority/Intervene status that meet one of the criteria for exiting Priority/Intervene status will be able to enter a hold status in their DA category for up to two years in order to allow for continuing improvement efforts to raise student achievement sufficiently to merit exit from Priority/Intervene status. Schools improving a letter grade from an "F" to a "D" will retain their Priority/Intervene designation. The school may qualify for a hold status allowing additional time in their current intervention model based upon improving the school grade. However, the school must meet the Priority/Intervene exit criteria by the end of the second year or move to implement an Intervene Option Plan. Currently, the options are closure, district-managed turnaround, charter, or an external management organization. In order to provide LEAs the flexibility to make sustained improvement, Florida is requesting the authority to offer LEAs the ability to implement a fifth option. This option may be a Hybrid Model of the other options (such as a district-operated charter school) or another option altogether as long an LEA demonstrates that the option is as, or more likely, to turn around the school in the same, or in less, time than the current four options.

2.E FOCUS SCHOOLS

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

D Schools = Focus/Correct Schools

Florida proposes to use the school grade system to identify Focus/Correct schools as those receiving a grade of "D."

Most Recent School Grades Used to Identify Schools for Table 2

Florida has two distinct timelines for the release of schools grades. Elementary and middle school grades are released in July of each year. High school grades are released in December due to the inclusion of other grade components including Advanced Placement, Dual Enrollment, and graduation rate. As a result, FDOE used the most recent school grades data to populate Table 2 (Attachment 9). FDOE based the identification of Focus/Correct schools using 2010-11 School Grades data for its elementary and middle schools and 2009-10 School Grades data for its high schools. Based upon this calculation, there are 174 schools that would qualify for the Focus/Correct school designation. This number reflects 9% of the state's Title I schools.

2010-2011 School Grades

Florida is currently in the process of revising its school grading calculations. The state's simulation using the proposed Florida Comprehensive Achievement Test (FCAT 2.0) changes indicates that the Focus/Correct category would include 299 schools, reflecting 16% of all Title I schools in the state's current accountability system. See page 117 for a summary by school type.

Florida's Focus/Correct and Priority/Intervene Schools Include Schools with the Largest Achievement Gaps

The achievement gap results shown in the tables below indicate that Florida's proposed model for identifying Focus/Correct and Priority/Intervene schools target those schools that have the largest achievement gaps to overcome. The supports that will be directed to these schools through DA will help focus resources to close these achievement gaps. The "gap" is the percentage points by which students in the category trail the state's overall percentage of students (the "all students" group) who score level 3 or higher in the applicable subject (reading or mathematics).

The gaps presented were calculated using the following formula:

Percentage point gap = the percentage of students scoring level 3 or higher in the state's "all students" group minus the average school percent scoring level 3 or higher for students in the applicable subgroup

These results are based on publicly reported outcomes for Florida schools (see files under "Measuring Adequate Yearly Progress [AYP] available in Excel format" at http://schoolgrades.fldoe.org/). A negative number indicates that students in the category exceed the percent proficient outcome for all students statewide (that is, with a negative number there is no gap). "Non Focus/Priority" schools are all Florida schools with outcomes other than those designated as Focus/Correct and Priority/Intervene schools in Florida's ESEA Flexibility Request.

The Percentage Point Gap Between All Students and Subgroups was Greatest at Focus and Priority Schools

	Economically Disadvantaged			Students with Disabilities		
	"D" Schools Focus Schools	"F" Schools Priority Schools	Non Focus/Priority Schools	"D" Schools Focus Schools	"F" Schools Priority Schools	Non Focus/Priority Schools
Avg. Gap Reading	17%	23%	3%	37%	39%	25%
Avg. Gap Mathematics	17%	24%	4%	36%	41%	25%

	English Language Learners			African-American		
	"D" Schools Focus Schools	"F" Schools Priority Schools	Non Focus/Priority Schools	"D" Schools Focus Schools	"F" Schools Priority Schools	Non Focus/Priority Schools
Avg. Gap Reading	25%	24%	13%	22%	25%	12%
Avg. Gap Mathematics	22%	21%	10%	23%	26%	12%

	Hispanic			Total ("All Students" Subgroup)		
	"D" Schools Focus Schools	"F" Schools Priority Schools	Non Focus/Priority Schools	"D" Schools Focus Schools	"F" Schools Priority Schools	Non Focus/Priority Schools
Avg. Gap Reading	16%	18%	-1%	14%	21%	-3%
Avg. Gap Mathematics	16%	19%	-1%	15%	23%	0%

2.E.ii Provide the SEA's list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Florida's accountability process begins each year in June/July with the release of Florida Comprehensive Assessment Test (FCAT) performance scores and school grades. FDOE uses the resulting school performance data to place schools within the DA matrix. Focus/Correct schools

will be those with a school grade of "D." Once the Focus/Correct schools have been identified, FDOE notifies the LEA and subsequently publishes the DA schools list by category on its website. A sample of this report for 2011 can be found at http://flbsi.org/xls/DA_2011_01JUL11.xls. LEAs receive technical assistance annually through face-to-face meetings, webinars, and online technical assistance papers (http://flbsi.org/schoolimprove/index.htm). The FDOE also provides a detailed school improvement reporting timeline for the LEAs (http://flbsi.org/SIP/). The timeline and its components serve to ensure that the LEA and schools are clearly defining the needs, aligning resources, and identifying support strategies to ensure positive school improvement outcomes. The overall process consists of four components that are aligned to nationally-recognized turnaround principles:

- School Improvement Plan (SIP)
- District Improvement Assistance Plan (DIAP)
- Compliance Checklists
- Progress Monitoring

These mechanisms will continue to apply to Focus/Correct Schools under Florida's flexibility proposal.

School Improvement Plan (SIP)
Section 1001.42(18)(a), Florida Statutes, requires that LEAs "annually approve and require implementation of a new, amended, or continuation school improvement plan for each school in the district." Each plan must address student achievement goals and strategies based on state and LEA achievement standards. The plan must also explicitly detail the supports, strategies, and interventions to be used throughout the year to ensure improved performance outcomes for all student subgroups. The SIP serves as a blueprint of the actions and processes needed to produce school improvement. Florida's continuous school improvement planning process is the course of action employed to coordinate and prioritize all the work of the school in the context of student achievement. A SIP is the plan that coordinates and prioritizes this process. The components of the SIP are aligned to proven turnaround principles and include:

- Student Achievement Data
- Part I: School Information
    - Highly Qualified Staff
        - Administrators
        - Coaches
        - Teacher
    - Staff Demographics
    - Teacher Mentoring Program
    - Coordination and Integration of federal, state, and local services/programs
    - Response to Intervention
    - Literacy Leadership Team
    - Public School Choice

- Part II: Expected Improvements
    - Reading, writing, mathematics, science goals
        - Students achieving level 3
        - Students achieving above level 3
        - Percentage of students making learning gains
        - Percentage of students in the lowest-performing 25% making learning gains
        - Student subgroups not meeting the AMOs
        - Professional Development/Professional Learning Communities (PLCs)
        - Budget allocation/funding sources
    - Attendance, Suspension, Dropout Prevention, Parental Involvement, and Additional Goals
        - Professional Development/PLCs
        - Budget allocation/funding sources
    - Differentiated Accountability Compliance
    - School Advisory Council

For Focus/Correct Schools, the SIP process begins with the LEA, school, and regional team convening to review the prior year's school performance data by content area, grade level, and subgroup. The resulting disaggregated data are used as the basis for the development of a comprehensive SIP. The school, LEA, and regional teams work collaboratively to identify barriers, new strategies, actions steps, responsibilities, timelines, and resource allocation essential in supporting their improvement efforts. An effective school improvement planning process allows Florida schools to develop a strategic and continuous plan that focuses on quality education and high levels of student achievement. It also ensures that there is a specific focus on students by subgroup and those in the lowest quartile in each tested area.

The SIP is reviewed monthly to evaluate the effectiveness of the plan's implementation or need for revision based upon newly identified needs and relevant data. In this manner, the FDOE ensures that the SIP remains a living document that serves as the template for substantive school reform.

District Improvement Assistance Plan (DIAP)
The DIAP acts in tandem with the SIP to ensure that the LEA works to align resources, support, and strategies to assist its students and schools. The DIAP is due in September of each year allowing adequate time for LEAs to review pertinent data, collaborate with schools in the development of their SIP plans, and work with stakeholders to finalize the plan. The current DIAP template can be viewed at http://flbsi.org/DIAP/. The components of the DIAP include:

- For the use of Title I funds
    - Parental involvement in the plan's development
    - AMO data review, identification of deficiencies, and target setting
    - Identification of specific needs of low-achieving students, instructional needs for each subgroup, and plan for how they will be addressed
    - List of research-based reading, mathematics, science, and writing programs to be used at each school level (elementary, middle, high)
        - Identification of extended learning opportunities
    - Assurance that a certain percentage of Title I, Part A funds are committed to

professional development
    - Parental involvement plan
- For the use of Title III funds
    - Identification of factors that prevented the LEA from achieving AMOs in the following:
        - English language learners
        - Reading
        - Mathematics
    - Identification of research-based professional development strategies and activities
    - Description for parental involvement and outreach strategies
    - Identification of changes to the Title III program

Compliance Checklists

As referenced in Section 2.D.iii, FDOE uses both school- and LEA-level compliance checklists that are aligned to national turnaround principles known to lead to successful improvement in low-achieving schools. The checklists outline specific deliverables that must be submitted as a means to ensure compliance and as a baseline for the FDOE and LEA monitoring of the school's initiatives throughout the year for the following areas:

- School Improvement Planning
- Leadership
- Educator Quality
- Professional Development
- Alignment and Pacing of Curriculum
- Florida's Continuous Improvement Model
- Monitoring Processes and Plans

In addition to the verification of improvements in the areas above, FDOE uses interim assessment data to establish a baseline for student achievement. LEAs/schools must submit their approved baseline data reflecting student achievement in reading, mathematics, science, and writing by October of each year. This baseline data serves as a checkpoint for schools in the review of their existing SIP and is used to:

- Compare the most recent performance to the needs previously identified in the SIP. The SIP can then be modified based upon the new data with additions and/or deletions of activities.
- Develop their Florida Continuous Improvement Model focus calendars and lessons based upon newly identified benchmark deficiencies.
- Modify intervention processes to ensure that it reflects the newly identified needs of the students.
- Provide a means to monitor the effectiveness of existing programs, strategies, and action steps when the mid-year assessment data is reported in January of each year.

Through this continual process of evaluating student achievement and growth over time, schools are better able to adapt to the changing needs of their students.

The timeline below will ensure that an LEA with one or more Focus/Correct schools will identify the specific needs of the schools and their students.

Proposed Timeline to Identify Needs of Focus/Correct Schools

June - July 2012	Regional Executive Directors meet with LEA superintendents to review LEA compliance with DA
September 2012	District Improvement and Assistance Plans due
October 2012	School Interim Baseline Data due
October 2012	School Improvement Plans submitted to FDOE
January 2013	School Mid-Year Data Reports due
February 2013	School Mid-Year Narrative Reports due comparing the overall performance by grade, content area, and subgroup to the baseline measure

The requirements and responsibilities for schools assigned to the Focus/Correct category are also adopted by the State Board of Education (Rule 6A-1.099811, Florida Administrative Code) and are described in Section 2.D.iii of this document. The interventions selected are based upon school transformation principles that have a proven track record of success that are both substantive and sustainable over time.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

When a school reaches a school grade of "C" they will exit Focus/Correct status. In order to prevent schools from persisting in the Focus/Correct category, schools must exit within two years following the first year of classification as a Focus/Correct school. A third consecutive "D" grade requires implementation of the district-managed turnaround options which entails:

- Principal/Administrator replacement.
- Reconstitution of staff (at least 50% of staff must be replaced).
- Differentiated pay scale to recruit/retain highly qualified staff.
- Revised curriculum.
- Increased learning time to reflect at least 300 hours of additional instructional time for all students. This criterion could be met with 60% of the increased learning time supporting all students (extended day and/or year) and 40% being supported through traditional targeted services including before school, after school, weekend, and summer academies.
- Demonstration that the LEA has prioritized the school in its support initiatives through

allocation of additional funds and human capital.

The selection of Florida's school grading system as the key input for determining schools' DA status is based on several factors:

- Florida's "A" through "F" School Grades program provides understandable measures of school achievement for all stakeholders and drives incentive for improving student achievement.
- School grading has a history of success (spanning more than a decade) in improving critical areas of academic performance for Florida's student populations spanning elementary, middle, and high school levels of instruction.
- School grading is founded on measurable student achievement in core academic areas, including test results measuring student performance as well as student progress.
- Florida's high school grading system includes additional measures of achievement for evaluating on-time graduation, advanced curriculum participation and performance (including at least one measure for career readiness), and college readiness.
- Florida's School Grades system is based on the idea that raised expectations are a vital part of success in implementing accountability to improve opportunities for all of Florida's students, and that continuing to raise expectations and standards is essential for moving Florida where we want to be within the next five years, when the state will apply national common assessments to provide both national and international comparative measures for evaluating Florida students' progress and achievement.
- Our School Grades system works to most effectively identify successful schools, reward success, and enable improvement.
- Florida's School Grades system is designed to accommodate progressive improvements in its own structure over time.
- The ability of LEAs to implement some of the more difficult interventions has been undermined by the disconnect between AYP measures and the state's successful school grading system.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

FDOE has provided a table (Attachment 9) identifying the Reward, Priority/Intervene, and Focus/Correct schools using a combination of School Grades data. As the state has two distinct timelines for the release of School Grades, the state used 2009-10 data to categorize high schools and 2010-11 data to categorize elementary and middle schools. See "Actual Data" below for summary. FDOE has provided a count of schools, by school type, that would be classified as Priority/Intervene and Focus/Correct schools using actual 2010-11 School Grades as applied to the state's newly proposed FCAT 2.0 criterion below.
Elementary = 193 Focus/Correct and 77 Priority/Intervene
Middle = 47 Focus/Correct and 7 Priority/Intervene
High School = 38 Focus/Correct and 12 Priority/Intervene
Combination School (excludes High Schools) = 21 Focus/Correct and 6 Priority/Intervene
Total Focus/Correct = 299 which equates to 16% of Title I schools
Total Priority/Intervene = 112 which equates to 6% of Title I schools

Actual Data
Total # of Title I schools in the state: 1,853
Total # of Title I-participating high schools in the state with graduation rates less than 60%: 26
Total # of Reward Schools: 1,975 (901 are Title I)
Total # of Focus/Correct Schools: 174 (144 are Title I)
Total # of Priority/Intervene Schools: 35 (29 are Title I)

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

The enhanced DA program works to ensure that schools not meeting an acceptable level of student achievement are categorized in and supported by DA and, as a result, must comply with the requirements applicable to their category. Florida had 1,853 Title I schools in 2010-11. Application of the federal criteria defining Priority/Intervene and Focus/Correct schools would result in the identification of 35 Priority/Intervene schools (of which 29 are Title I schools) and 174 Focus/Correct schools (of which 144 are Title I schools).

If Florida's 2010-11 school grading data were recalculated using expected new cut scores for FCAT 2.0 assessments in reading and mathematics, the state would have 1,188 schools in three categories of Priority/Intervene, Focus/Correct, and Prevent (of which 966 are Title I schools, or 52% of total Title I schools) that would receive support through the DA program.

Proposed School Designations
Based Upon Expected New FCAT 2.0 Criteria Applied to 2010-11 School Performance Data

School Grade	Federal Category	DA Category	Projected Number	% of Title I Schools
F	Priority	Intervene	112 (106 Title I)	6% (106/1,853)
D	Focus	Correct	299 (270 Title I)	15% (270/1,853)
C		Prevent	777 (590 Title I)	32% (590/1,853)
A or increased school grade	Reward		1,848	

Florida also applied proposed DA criteria for Focus/Correct and Priority/Intervene schools to the most recent actual school grading outcomes for Florida's schools. These outcomes do not reflect the impact of Florida's new FCAT 2.0 standards in reading and mathematics, and therefore reflect numbers and percentages in the Focus/Correct and Priority/Intervene categories that are lower than corresponding numbers in the table above.

Proposed School Designations
Based Upon Actual School Performance Data
2009-10 for High Schools and 2010-11 for Elementary and Middle Schools
(Does not Factor in the Impact of New Standards)

School Grade	Federal Category	DA Category	Actual Number	% of Title I Schools
F	Priority	Intervene	35 (29 Title I)	2% (29/1,853)
D	Focus	Correct	174 (144 Title I)	8% (144/1,853)
C		Prevent	534 (446 Title I)	24% (446/1,853)
A or increased school grade	Reward		1,971	

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;
ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and
iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

Florida has worked systematically to build capacity for LEAs and their schools to support student success. In the last several years, FDOE has also executed considerable restructuring and dedicated resources to improve the state's capacity to effectively support struggling schools. It is because the state has taken a systematic approach that reaches every LEA and school, coupled with additional supports and expertise for schools with gaps and additional needs, that these approaches and strategies are likely to succeed. Florida's data showing improvements are already being made is the evidence that ultimate success is likely.

Curriculum Standards

Building capacity at the local level began with the alignment and consistency of state-level policies that affect the ability of the LEAs to work more effectively and efficiently. Florida adopted rigorous content standards for students in all content areas K-12. Our Next Generation Sunshine State Standards have been reviewed and highly rated by national and international experts. More

recently, the state has also adopted the Common Core State Standards. Florida was one of the first states in the nation to implement a statewide assessment system, funded by state appropriations, built to assess the identified state curriculum standards teachers were required to teach. Prior to this, LEAs identified and purchased norm-referenced assessments as required by the state that were not built to assess student mastery of the state standards. The next step was aligning the requirements of LEA purchases of instructional materials to the adoption of new standards. Florida's statewide instructional materials schedule was revised so that state funding dedicated to instructional materials would match the year LEAs are required to implement new standards. Florida has implemented this process for both Next Generation Sunshine State Standards and Common Core State Standards. Finally, the State Board of Education approval of course descriptions that include the new Common Core State Standards are scheduled the year prior to the year teachers are required to teach from those course descriptions and a year prior to when students are assessed on those same standards. This alignment allows LEAs to utilize their funds and implement local instructional changes and provide professional development more efficiently.

Educator Quality

During the 2010-11 school year, the state spent considerable human and financial resources through Race to the Top and existing staff to assist LEAs in the redevelopment of instructional personnel and school administrator evaluation systems. This included a combination of face-to-face academies for technical assistance lead by national experts; adoption of a statewide student growth measure for use in teacher and principal evaluations; research-based resources in improving instructional practice; onsite visits to LEAs; and technical assistance through webinars, conference calls, and e-mail. The state will continue its technical assistance during the 2011-12 school year by monitoring LEA implementation of new evaluation systems to support accuracy and improvement of instructional practice through:

- Assistance to LEAs to evaluate the effectiveness of professional development activities and to focus on professional development that is grounded in research showing improved student learning.
- Assistance to LEAs to ensure individual professional development is based on data as a result of evaluation system (results/analysis of instructional practice and student learning growth).
- Monitoring and feedback to LEAs on their professional development systems and their alignment to the state's Professional Development Evaluation Protocol Standards.
- Statewide support to LEAs in building capacity for a common language of instruction that includes classroom-level learning goals and formative assessments based on Next Generation Sunshine State Standards and Common Core State Standards and Florida's Multi-tiered System of Support.

School Improvement via Race to the Top

Additionally, Florida's Race to the Top funding is being used to support initiatives to develop turnaround leaders (a principal pipeline), develop rural LEA capacity, recruit teachers to two of the state's largest LEAs with the greatest representation of persistently lowest-achieving schools, and provide targeted summer professional development.

Leadership Pipeline for Turnaround Principals and Assistant Principals

The purpose of this project is to select a leadership preparation program partner. It is designed to prepare aspiring school leaders to effectively address the teaching and learning challenges of chronically low-achieving high schools and their feeder patterns. The primary objective of this initiative is to create a pool of the most promising candidates that can turn around schools through an innovative, problem solving-based program of study. This objective will be achieved by working with seven LEAs to recruit and train a minimum of 80 to 100 new principals and assistant principals to serve in the state's persistently lowest-achieving schools and their feeder patterns. The eligible LEAs are Miami-Dade and Duval, both of which have nine or more persistently lowest-achieving schools and Alachua, Broward, Osceola, Orange, and Pinellas, each of which has at least three persistently lowest-achieving schools. Each of these LEAs will be notified of their proportionate number of slots and the LEA will then develop a selection process to identify the aspiring turnaround leaders who will participate in the training.

The program will emphasize knowledge and behaviors that enable school leaders to promote successful teaching and learning, collaborative decision-making strategies, distributed leadership practices, a culture of collegiality in analysis, and use of data and instructional technologies to guide school improvement activities. Lesson Study, teacher evaluation, and project management will also be addressed. Quarterly topical seminars; an intensive half-year internship in a low-achieving middle or high school; and mentoring by a trained, highly effective principal will be cornerstones of this program. Once an aspiring principal or assistant principal completes the initial preparation program, the LEA will consider him/her for leadership vacancies in low-performing schools. When a program participant is placed, the LEA will provide a well-designed, two-year program of induction and support that includes ongoing professional development based on assessed needs to strengthen the participant's performance, coaching by an external school improvement coach, mentoring by an expert principal, and an opportunity to participate in a new principal network in which principals share their school leadership experiences and explore solutions to common problems in struggling schools. This will be a two-and-a-half year initiative that will result in a stronger administrative pool for Florida's persistently lowest-achieving schools.

Recognizing the role that charter schools can play in operating a turnaround school, or opening a new school within the feeder pattern a chronically low-achieving school, a separate strand will be created to provide leadership training for 20-25 current or aspiring charter school leaders in the seven LEAs. The charter school strand will emphasize knowledge and behaviors that enable school leaders to promote successful teaching and learning, collaborative decision-making strategies, distributed leadership practices, a culture of collegiality in analysis and use of data and instructional technologies to guide school improvement activities. In addition, the strand will focus on the effective use of the flexibility and autonomy provided to charter schools.

It is anticipated that this $7,000,000 contract will be awarded in December 2011 in order for the selection process and training to begin in January 2012.

Building Rural LEA-level Capacity for Turnaround

This is a state-led initiative to partner with an outside provider to help build LEA leaders' capacity to support low-achieving schools in 10 rural LEAs in Florida. Eligible LEAs include Bradford,

Columbia, Franklin, Gadsden, Levy, Flagler, Hendry, Jefferson, Washington, and Madison.

The partner will adapt and deliver leadership modules and coaching targeted at improving the capacities of the superintendent, school board, principals, and LEA senior staff in rural LEAs with persistently lowest-achieving schools. LEAs will be guided in establishing strategic plans and evaluation systems specifically designed to improve low-achieving schools in rural LEAs. LEAs will also receive training in community involvement and in developing a shared vision for improving schools. The partner will design and deliver off-site, big picture, vision- and capacity-building training activities that serve as guideposts for improvement. Onsite training and coaching activities will support the sessions to ensure implementation of the training. Specific training for board members and superintendents will include scenarios that stimulate board issues, participation in small group discussions, and training on the context and history of education policy through a series of workshops. The modules will be organized around four themes: governance, politics, whole-system change, and theories of action for change.

This $1,500,000 contract will fund a one-and-a-half year initiative. It is anticipated that the contract will be awarded in December 2011 and selection of candidates and training will begin in January 2012.

Recruiting Promising Teachers in Miami-Dade and Duval LEAs

The purpose of this discretionary grant award is to allow Miami-Dade and Duval LEAs to partner with a contractor(s) that will recruit and train promising teachers to work in their persistently lowest-achieving schools and their feeder patterns. The LEA shall partner with a contractor(s) with a proven track record for improving student achievement through innovative recruitment and training strategies. Several organizations provide highly specialized training to recent college graduates who do not have an education degree but are highly motivated, multi-talented, and wish to provide instruction in low-achieving schools. Recruiting such potentially promising teachers has been effective in raising student achievement in hard-to-staff schools, where they outperform traditionally prepared teachers. These teachers offer high expectations for student learning and a commitment to serving high-poverty neighborhoods.

The LEAs will leverage the experience of these teacher organizations and place recruits in schools and feeder patterns that comprise the persistently lowest-achieving schools list. The LEAs will rely upon the talent, track record, and capacity of these national organizations to bring a minimum of 504 high-quality teachers to Miami-Dade County School District and a minimum of 296 high-quality teachers to Duval County School District.

It is anticipated that this $9,000,000 grant will be awarded to the LEAs in early November 2011. Miami Dade LEA will receive $5,670,000 and Duval LEA will receive $3,330,000, over a three-year period.

Summer Differentiated Accountability Academies

Considering the need to raise student achievement in Florida's persistently lowest-achieving schools, it is clear that reform efforts must focus on improving instructional leadership and

teacher quality. Regional teams have identified, through Instructional Reviews at the majority of the state's persistently lowest-achieving schools, the following areas that require technical support:

- *Quality of Instruction* – The creation and delivery of quality lesson plans to incorporate explicit instruction, higher order questioning, and grade level rigor.
- *Lesson Study* – The continual improvement of teaching through the analysis, discussion, and peer observation of the lesson planning and instructional delivery process. Teams of teachers within a department or grade level work together to refine their lesson plans and perfect the delivery of instruction.
- *Common Core State Standards and Next Generation Sunshine State Standards* – Transitioning teachers to these standards to ensure explicit teaching of the standards and benchmarks.
- *Problem Solving and Response to Instruction/Intervention (PS/RtI)* – Providing instruction and interventions using a systematic problem-solving process to maximize student achievement.
- *Florida Continuous Improvement Model (FCIM)* –The knowledge and skills to understand how to analyze formative and interim assessments to identify students' academic needs, map curriculum to focus instruction, and modify delivery to ensure improved student learning.

At the summer DA academy, regional teams will provide professional development modules designed for principals, assistant principals, instructional coaches, department chairs, and lead teachers from the state's persistently lowest-achieving schools and their feeder patterns in the areas of Lesson Study, Common Core State Standards and Next Generation Sunshine State Standards, PS/RtI, and the FCIM over a four-year period in the summer. The summer DA Academy will provide a statewide approach to professional development that is designed to enhance instructional leadership and teacher effectiveness, improve instructional delivery, and increase student achievement. Regional teams are charged with ensuring that the components of the training are implemented with fidelity and effectiveness throughout the school year.

Regional Support for Building School and LEA Capacity

For low-performing schools the state's DA program works to support LEA and school capacity development. In order to build sustainable capacity within schools and LEAs, Florida created the DA regional system of support. There are five regional teams throughout the state with each consisting of a Regional Executive Director, Instructional Specialists (reading, mathematics, science, RtI, CTE, and using data), and STEM and reading coordinators. The regional teams provide LEAs and schools with change agents who possess a proven record of increasing student achievement in low-performing schools.

Regional teams provide onsite and LEA-wide professional development; offer expertise to superintendents, LEA teams, principals, and instructional coaches; monitor compliance in accordance with DA requirements; and monitor the academic progress of schools and LEAs through consistent follow-up visits to schools and through the analysis of assessment results. Each regional team is led by a Regional Executive Director, who drives turnaround efforts in the lowest-achieving schools and focuses on building the capacity of principals and LEA leadership teams in the turnaround process. The Regional Executive Director is required to have an accomplished record of turning around similar schools. Each Regional Executive Director reports to the FDOE's Deputy Chancellor for School Improvement and Student Achievement, who is

based in Tallahassee. The regional team staff members are FDOE employees, not outside consultants.

Similar to the Regional Executive Director, all specialists have a strong record of improving student achievement in turnaround situations. Whereas the work of the Regional Executive Directors focuses on building leadership capacity for turnaround, the specialists and coordinators focus on building the capacity of instructional coaches and teachers through LEA and school-wide professional development on using data to determine instructional interventions, using the new standards in mathematics and science, modeling effective instruction in the classroom, and Lesson Study implementation. Also similar to the DA Regional Executive Director, specialists and coordinators are required to significantly raise student achievement at their assigned lowest-performing schools or they are replaced.

The regional teams work directly with the lowest-achieving schools and LEAs in the areas of curriculum and instruction, LEA and school instructional leadership, school improvement planning, professional development, teacher quality, data analysis, and developing robust monitoring systems at the school and LEA level. An Instructional Review takes place at schools receiving direct support. The reviews are led by the regional teams but are conducted in collaboration with LEA and school leadership teams. At the conclusion of the Instructional Review, an action plan is crafted that outlines what steps need to be taken to improve the school. Action steps, timelines, and the persons responsible for each item are documented.

The ownership of the action steps is shared by the regional team, LEA, and school. Throughout the year, the Regional Executive Director monitors the implementation of the action steps and reports to the State Board of Education on the school's progress. Regional teams work specifically with a high-level LEA administrator who is in charge of the turnaround and school improvement process at the LEA. Monthly meetings are conducted at the LEA level to ensure that action steps are implemented and coordination occurs throughout the LEA to support the lowest-achieving schools.

The regional teams also work directly with schools and LEAs in the areas of curriculum and instruction, school leadership, school improvement planning, professional development, teacher quality, and data analysis with an emphasis on creating strong systems and practices to ensure sustainability. In order to build capacity the DA regional teams have an established framework that guides their work. The first steps include data analysis and development of the School Improvement Plan (SIP) and District Improvement Assistance Plan (DIAP). The regional teams work within these plans to ensure their alignment and focus. As the school and LEA begin to respond and develop their own systems the regional team's tiered support matrix serves as a means to gradually release responsibility back to the LEA and school once they have demonstrated sufficient capacity.

Initial LEA and School Site Visits

Initial site visits focus on developing rapport with LEA and school personnel and include a discussion of DA; the Strategies and Support document; and state, LEA, and school requirements. Trend data and plans for improvement are also discussed. The meetings are held at the LEA office or school sites, and participants include the regional team, superintendents, Title I

directors, school improvement directors, human resources directors, finance officers, principals, and any other LEA and school personnel with direct responsibility for ensuring implementation and compliance with DA.

The Regional Executive Director and/or Instructional Specialists meet with these local staff in order to:

- Complete the DA checklist and review the Instructional Review Action Plan.
- Review the Self-Assessment of Problem-Solving Implementation form and process.
- Review Tier I and II Critical Components Checklist and Observation tools and processes.
- Conduct observations of school Problem-Solving/Response to Intervention team meeting using Critical Components Checklist and Observation tools.
- Identify the systems in place to build the instructional capacity of teachers and the schools' immediate professional development needs.
- Identify the degree of alignment in instructional programs and instructional materials with particular emphasis on interventions for level 1 and level 2 students and subgroups.

Instructional Reviews

Once initial LEA and school site visits are complete, regional teams begin to implement instructional support by conducting an Instructional Review. These reviews are not evaluations of teacher performance; rather, they provide the opportunity to review instructional practices and develop action plans for improvement. Instructional Reviews occur via classroom walkthroughs performed over the course of a school day(s).

The following are expected observations during Instructional Reviews:

- Classroom Environment
    - Classrooms are consistently used as a resource to promote learning.
    - Classrooms contain literacy-rich, instructional-based visual aids and resources (e.g., interactive word walls, content posters, process posters, and project displays).
    - Classrooms display exemplar student work to establish quality control expectations for various types of student work (e.g., note-taking, homework, and quiz/tests).
    - Students are on-task, classroom activities are orderly, transitions between activities are smooth, and instruction is bell-to-bell.
    - Standards for acceptable student behavior and classroom procedures are established and maintained.
- Instructional Materials
    - Content materials are available in a variety of formats, are research-based, and are aligned with the Next Generation Sunshine State Standards.
    - Adequate content technologies that support student learning are available in the classroom and are easily accessible by all students.
    - Culturally and developmentally appropriate materials are utilized to support student learning.
    - Supplemental materials offer further breadth and depth to lessons.
    - Various learning styles are represented by resource materials (e.g., audio, visual, and motor).

- Supports and accommodations as identified in students' Individual Educational Plans.
- Course materials relate to students' lives and highlight ways learning can be applied in real-life situations.
- Materials are organized and readily available for teachers to use.

- Higher Order Questioning and Thinking
  - Students understand the purpose of a lesson or a lab and are able to explain what they are learning and how it relates to real world and/or current events relevant to students' gender, ethnicity, age, culture, etc.
  - Teachers model higher order thinking skills when presenting information and answering questions.
  - Scaffolding, pacing, prompting, and probing techniques are used when asking questions.
  - Teachers use adequate "wait time" between asking questions and eliciting student responses.
  - Students are engaged in "accountable talk" to show, tell, explain, and prove reasoning during modeled instruction and guided practice.
  - Questioning strategies are designed to promote critical, independent, and creative thinking.
  - Questioning techniques require students to compare, classify, analyze different perspectives, induce, investigate, problem solve, inquire, research, and to make decisions.
  - Teachers use inquiry methods to promote conceptual change and a deeper understanding of the content.
- Student Engagement
  - Students are effectively engaged in instruction through hands-on activities that include the use of technology.
  - Students are comfortable taking part in peer-to-peer interaction while working in small groups.
  - Teachers incorporate collaborative structures during guided practice.
  - Students take part in cooperative projects where each student's knowledge is needed by others in the group to complete the assignments.
- Differentiated Instruction
  - Teachers analyze data to design instruction that addresses the various needs, interests, learning styles, and abilities of individual students.
  - Teachers select strategies, materials, and technologies to address students' multiple learning styles and cultural experiences and to stimulate individual students' intellectual interests.
  - Students are effectively engaged in varied small group activities based on individual student needs while being monitored by the teacher.
  - Teachers assign tiered activities (i.e., a series of related tasks of varying complexity) as alternative ways of meeting the same benchmark taking into account individual student needs.
  - School administrators and teachers target interventions for individual students in subgroups based upon data analysis.
- Data Analysis

- Ongoing informal and formal assessments are used to monitor individual student progress, including progress toward mastery of the Next Generation Sunshine State Standards and to make instructional changes, if needed.
- Teachers incorporate Checks for Understanding throughout a lesson to ensure students are obtaining the knowledge and skills to answer the Essential Question by the end of class.
- Teachers use formative assessments to determine whole class and small group instruction.
- Teachers use summative assessments to evaluate what students have mastered.
- Students are provided with specific expectations as to how class tasks/assignments are to be completed, when they are to be finished, the form in which they are to be presented, and the quality of the final product.
- Teachers hold students accountable for and give appropriate feedback on class work and homework.
- Teachers maintain observational and anecdotal records in the course of monitoring students' development.
- Teachers employ performance-based assessments that require students to demonstrate skills and competencies that realistically represent problems and situations likely to be encountered in daily life, then judge the quality of the student's work based on an agreed-upon set of criteria.
- Portfolios are used as an ongoing measure of student progress and can include student work, reports, reflections, self-assessments, and even peer-teacher assessments.
- Diagnostic assessments are used for students not demonstrating progress in core content instruction.
- Florida Continuous Improvement Model (FCIM) calendars, mini-lessons, and mini-assessments are developed within professional learning communities (PLCs), and are delivered by all teachers.
- FCIM mini-assessment data is analyzed during PLCs and used to identify students reaching mastery and those not reaching mastery on FCIM lessons.
- Students are provided tutorial and enrichment opportunities based on FCIM assessment results.
- FCIM maintenance strategies are developed within PLCs and are a part of daily instruction.
- School leadership monitors the fidelity and evaluates the effectiveness of the FCIM process through regular meetings with grade levels and/or the department teams.

- Reading and Writing Across the Curriculum
  - Teachers are knowledgeable about research-based, appropriate reading and writing instructional strategies and incorporate them into their lessons.
  - Teachers incorporate vocabulary acquisition strategies (e.g., picture notes, word mapping, interactive word walls, and context clues) into their lessons before, during, and after reading content materials to support the learning of vocabulary.
  - Teachers provide examples of vocabulary use in text and through rich classroom discussions (e.g., word origins and their meanings, decontextualizing words, high frequency words across multiple domains, multi-faceted meanings, and shades of meaning).

- Teachers use non-fiction reading materials that support student learning and ensure these materials are readily available and easily accessible by all students.
- Teachers incorporate FCAT short response and extended response items in lessons, homework, and assessment.

- School and LEA Leadership and Coaching
  - LEA trains staff on performance appraisal instruments and the performance appraisal process is implemented with fidelity by school administration.
  - Members of the school and LEA leadership teams participate in a comprehensive instructional monitoring process that collects observational data on the fidelity of programs, policies, and procedures in the classroom.
  - Members of the school and LEA leadership serve as instructional leaders by providing teachers with guidance and modeling designed to improve instruction while adhering to all steps of the coaching cycle.
  - School and LEA leadership ensure all instructional staff members have access to curriculum-related materials and the training necessary to increase student attainment of the New Generation Sunshine State Standards.
  - School and LEA leadership plan and allocate resources, monitor progress, provide the organizational infrastructure, and remove barriers in order to sustain continuous school improvement.
  - School and LEA leadership monitor fidelity of implementation of the School Improvement Plan.
  - School Advisory Council receives quarterly updates on the implementation of the School Improvement Plans and makes necessary updates.
  - School leadership establishes a system for shared leadership to formalize roles and responsibilities for the instructional coach, department head, grade level lead teacher, etc.

<u>Problem Solving/Response to Intervention (PS/RtI) Implementation Reviews</u>

- Problem Identification activities:
  - Data are used to determine the effectiveness of core instruction.
  - Decisions are made to modify core instruction or to develop supplemental (Tier II) interventions.
  - Universal screening (e.g., DIBELS) or other data sources (e.g., LEA-wide assessments) are used to identify groups of students in need of supplemental intervention.
- Problem Analysis activities:
  - The school-based team generates hypotheses to identify potential reasons for students not meeting benchmarks.
  - Data are used to determine viable or active hypotheses for why students are not attaining benchmarks.
- Intervention Design and Implementation activities:
  - Tier I: Modifications are made to core instruction.
    - A plan for implementation of modifications to core instruction is documented.
    - Support for implementation of modifications to core instruction is documented.

        - Documentation of implementation of modifications to core instruction is provided.
    - Tier II: Supplemental instruction is developed or modified.
        - A plan for implementation of supplemental instruction is documented.
        - Support for implementation of supplemental instruction is documented.
        - Documentation of implementation of supplemental instruction is provided.
- Program Evaluation of RtI activities:
    - Criteria for positive RtI are defined.
    - Progress monitoring and/or universal screening data are collected/scheduled.
    - A decision regarding student RtI is documented.
    - A plan for continuing, modifying, or terminating the intervention plan is provided.

After classroom visits are completed and PS/RtI team processes are observed and reviewed, the School Improvement Plan is reviewed to ensure that it adequately addresses the needs of the school. The completed report includes the commendations and concerns and identifies specific action steps to remediate the concerns, as well as the person responsible for executing and monitoring implementation of the action steps that are to be included in the final School Improvement Plan (SIP). A SIP Action Plan (Attachment 13) for reading, mathematics, science, and PS/RtI are completed for each school. Prior to completion of the SIP Action Plan, there is communication between regional team members and appropriate LEA and school personnel. SIP Action Plans are then sent to the superintendent, LEA administrators, and the school principal. These documents remain flexible allowing for regular revision as activities are completed and/or new concerns are identified.

Action Plan Calendar and Visitation Schedule

After the SIP Action Plans are finalized, the regional teams meet with the school leadership team to develop a calendar to implement and monitor the SIP Action Plan steps. SIP Action Plan calendars target school-wide and content-specific strategies to be implemented in an agreed upon timeframe. This strategic planning provides a systematic approach to implement the SIP Action Plan while building school capacity for ongoing school improvement.

Based upon the SIP Action Plan calendar timeframes, the regional team and the school leadership team create a visitation schedule to provide professional development training and/or technical support and assistance as necessary to implement strategies. For example, the regional teams and the school leadership team reconvene every four weeks to adjust the SIP Action Plan calendar as necessary and review RtI data since RtI teams collect data in two-week intervals to measure the effectiveness implemented strategies. Additionally, the Regional Executive Director assigns content area specialists based upon each school's needs.

While the framework to support overall capacity is embedded within the comprehensive school and LEA improvement planning process the DA teams also rely on providing ongoing professional development for both school and LEA staff through side-by-side coaching, modeling, PS/RtI, data analysis, and summer professional development cadres. Additionally, the regional teams are supported by the FDOE resulting in a common vision and voice for all initiatives. The state's DA process took the first steps toward transitioning from compliance monitoring to implementation support, effectively transitioning from a theoretical process to

practical application.

Approval of External Providers for School Turnaround

DA regional teams, in collaboration with LEAs/schools, conduct rigorous program reviews prior to partnering with additional external providers. The process begins with the data analysis and review of existing programs and or processes. The PS/RtI process is instrumental in evaluating existing programs. The process involves reviewing the need, implementation, and fidelity in which a program was used. If it is deemed that a new program is needed the regional teams work to ensure that new program(s) is/are research-based and that the LEA and school have a comprehensive plan for implementation, monitoring, and annual evaluation. The regional teams do not endorse programs nor are they involved in the identification of possible programs, but are instrumental in ensuring that programs being considered align with state initiatives and incorporate sound instructional pedagogy.

The state has clearly defined criteria that LEAs must use as they recruit external partnerships with either charter operators or management companies for school turnaround. Through the existing Intervene Option Plan timeline LEAs submit specific deliverables that detail the organizations they are engaging for possible contract. Through this process the LEA and partner submit evidence of successful turnaround in similar schools and a sample contract to ensure autonomy. The FDOE defines these partners as an outside entity that:

- Operates a school or cluster of schools.
- Has experience achieving results with high-poverty student populations and working in a school turnaround environment.

In order to ensure that the partner is provided with the resources and flexibility to facilitate change the FDOE requires that each partner:

- Sign a three- to five-year performance contract for student achievement with an LEA with an annual performance review based upon clearly defined learning goals. The LEA will hold the partner accountable as outlined in the approved contract.
- Work with unionized teaching staff under modified contracts, be held accountable for student performance, operate under some but not all LEA procedures and regulations, and use some but not all LEA central office services.
- Demonstrate scalability to ramp up capacity quickly, modify an existing school model to meet the needs of a turnaround environment, and open new operations in or expand existing operations.
- Design a comprehensive school model including instructional programs and socioeconomic supports, and transform the existing culture to create a positive learning environment.
- Execute a full community engagement plan.
- Work collaboratively with LEA central office staff.
- Education Management Organizations/Lead Partners not be exempt from existing statute(s).
- Have the authority to hire a new principal/administrative team or approve the current one.
- Support the principal in hiring and replacing teachers and have responsibility for bringing

in a meaningful cohort of new instructional staff.

- Provide core academic and student support services directly or by aligning the services of other program and support partners and build internal capacity with the schools.
- To ensure success the group must clearly demonstrate that they have established an embedded, consistent, and intense relationship within each school.
- Provides instructional and operational support directly to school.
- Discuss progress and barriers with the principal on a regular basis.
- Ensure that appropriate services are procured from LEA offices.
- Manage key program functions:
    - Human Capital
    - Curriculum and Instruction
    - Policy/legal
    - Administration and finances
    - Community advocacy
    - Socio-emotional support service and partnerships
    - Data analysis and evaluation

Ensuring Sufficient Support and Leveraging of Federal Dollars

Florida's DA process clearly outlines the means to monitor and support meaningful research-based turnaround principles. The DA processes have been substantiated throughout this application with a focus on data analysis, program evaluation, longitudinal planning, resource allocation, human capital, and ongoing progress monitoring. Through the DA Strategies and Support document the state has clearly defined the responsibilities of the FDOE, school, and LEA that are aligned to research-based turnaround principles. It is important to note that since 2008 the DA processes have reflected the highly effective turnaround principles currently outlined in the School Improvement Grant (SIG) and Race to the Top. The state has been able to leverage new federal funds including SIG and Race to the Top to enhance existing structures for regional support and LEA/school activities. Examples of successful turnaround principles include:

- Common planning time
- Extended learning day
- Recruitment/retention bonuses
- Performance pay for instructional staff and administrators
- Differentiated pay for employees at persistently lowest-achieving schools
- Job-embedded professional development

The regional teams were able to leverage SIG dollars as each Regional Executive Director was responsible for working with schools in the development and approval of their SIG applications. The Regional Executive Director is instrumental in evaluating the LEA's capacity, program activities, budget allocation; and developing annual goals. Throughout the year, the Regional Executive Director incorporates the components of the SIG into their monthly monitoring meetings to ensure that the school/LEA is implementing the specified activities. The Regional Executive Director reviews the expenditures following the American Recovery and Reinvestment Act quarterly submissions to ensure that expenditures match the program activities. Significant deficiencies or overages trigger the Regional Executive Director to meet with the LEA to review

the application activities and, if needed, require the LEA to submit a timeline for corrective action. At the end of each year the Regional Executive Director meets with the school and LEA staff to evaluate the school's progress toward their established annual goals. If the school meets 80% of their goals the grant will be renewed. Failure to meet the approved goals requires the selection of a different improvement plan option. The Commissioner of Education reserves the right to require that LEAs with more than nine schools in both Priority/Intervene and/or Focus/Correct categories submit a funding plan that describes how the LEA will prioritize its schools and how each federal funding source supports the schools' overall improvement. The state also uses reverted SIG funds, due to school closure or unspent allocation, to provide additional competitive grants to existing SIG schools to promote additional reform initiatives.

At the state level, Race to the Top funds resulted in additions to the existing regional support teams. The Race to the Top funding provided for 40 reading coordinators, nine data coaches, five Career and Technical Education specialists, and 20 STEM specialists to better align the state's initiatives and ensure project outcomes.

Schools in DA are held accountable and monitored through a combination of plans/tools including:

- School Improvement Plan
- District Improvement Assistance Plan
- Analyses of baseline and mid-year assessments data in the areas of reading, writing, mathematics, and science
- DA Strategies and Support Document
- District Compliance Checklist
- School Compliance Checklist
- Instructional Review Action Plan
- School Improvement Grant Monitoring
- Intervene Option Plan Submission (Intervene Schools Only)

These plans act in unison to structure each reform initiative and serve as a means to monitor their progress toward meeting their designated activities.

LEAs failing to improve school and student performance must implement a series of rigorous requirements, including:

- Strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with state academic content standards.
- Using data to inform instruction and for continuous improvement, including providing time for collaboration on the use of data.
- Establishing a school environment that improves school safety and discipline and addresses other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and providing ongoing mechanisms for family and community engagement.
- Providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget.

- Providing job-embedded, ongoing professional development informed by teacher evaluation and support systems and tied to teacher and student needs.
- Redesigning the school day, week, or year to include additional time for student learning and teacher collaboration.
- Reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort.
- Preventing ineffective teachers from transferring to these schools.
- Reviewing the performance of the current principal.
- Replacing the principal if necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort.

For all LEAs and schools, non-compliance with any of the required interventions and supports may lead to:

- State Board of Education intervention in operations
- State funds withheld
- Report of non-compliance to the State Legislature with recommended legislative action
- Conditions placed on Title I or Title II grant awards
- Redirection of Title II, Part A funds
- Movement to a more severe category

Historically, the DA program has yielded significant improvement. In 2009-10 there were 52 schools receiving assistance through DA. As Table 1 below indicates, 48% of schools improved one or more letter grades. In 2010-11, there were 118 schools receiving such assistance. As Table 2 below indicates, 42% of these schools improved one or more letter grades. Additionally, the state tracks the impact that the DA program has had on schools regarding their AYP improvements. In 2009-10, as indicated by Table 3, below 60% of the schools demonstrated improvement in their overall AYP performance. Finally, Table 4 shows that in 2010-11, 36% of the targeted schools demonstrated improvement in their overall AYP performance.

Table 1: Changes in School Grade Performance 2009-10

School Type	Improved Grade	Remained Unchanged	Declined
Elementary/ Middle	9	5	4
High School (FCAT component scores only)	12	10	7
Combination	4	1	0

Table 2: Changes in School Grade Performance 2010-11

School Type	Improved Grade	Remained Unchanged	Declined	I/No Score
Elementary/ Middle	38	16	2	2
High School (FCAT component scores only)	5	30	8	1
Combination	6	7	0	3

Note: The high school grading criteria changed to include end-of-course assessments, elimination of FCAT mathematics in ninth grade, and increased standards in writing.

Table 3: Changes in School AYP Performance 2009-10

School Type	Improved AYP More than 5 Percentage Points	Improved by 5 Percentage Points or Less or Remained Unchanged	AYP Declined
Elementary/Middle	7	5	6
High School	21	7	1
Combination	3	1	1

Table 4: Changes in School AYP Performance 2010-11

School Type	Improved AYP More than 5 Percentage Points	Improved by 5 Percentage Points or Less or Remained Unchanged	AYP Declined
Elementary/Middle	28	18	10
High School	9	14	20
Combination	5	10	1

Principle 2 Conclusion

Florida has, over the past decade, developed and implemented a series of unprecedented reform efforts that include a state-based system of differentiated recognition, accountability, and support. State legislators have consistently supported these efforts as demonstrated by the annual allocation of approximately $120 million to high-performing schools and schools that have significantly improved. These support and accountability systems will provide the needed levels of assistance and rewards as well as help schools meet ambitious but achievable Annual Measurable Objectives (AMOs) for all students. The four proposed AMOs will capture the needed objectives and establish local and state targets of achievement and growth needed for all students. These ever-rising targets will ultimately place Florida as a top-performing state in the nation and world. We see this effort not as a retreat from accountability, but an opportunity to strengthen accountability and support and put in place the right conditions for schools and teachers to do their jobs most effectively.

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

Option A	**Option B**	**Option C**
☐ If the SEA has not already developed any guidelines consistent with Principle 3, provide: i. the SEA's plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year; ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and iii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance	☐ If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide: i. a copy of any guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); iii. the SEA's plan to develop and adopt the remaining guidelines for local teacher and principal evaluation and support systems by the end of the	☒ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide: i. a copy of the guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); and iii. a description of the

Georgia

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2. A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

The goal of the state's differentiated recognition, accountability, and support system is to provide meaningful information about school performance that guides initiatives to effectively improve student achievement and graduation rates, promotes capacity for sustained progress over time, closes achievement gaps for all schools across the state, and targets interventions at those schools with greatest need.

The CCRPI is a school improvement tool for all schools, and this transition year (2012-2013) will provide an opportunity for all schools to examine their data on the multiple indicators included in the CCRPI. The focus of all efforts in school improvement is to improve student achievement in the major content areas for all students. An in-depth analysis of data is the core to identifying what areas need attention and how interventions can be put in place to support student learning. In this effort, for the 2012-2013 school year, the staff in the School Improvement Divisions will transition from focusing on data generated through the AYP report to data generated from the CCRPI report. An analysis of performance by content, CCRPI indicators, and subgroups will be used to work with schools that are being served based on the 2011 AYP release. It is anticipated that all schools will need to fine-tune previously unattended areas in an effort to meet the needs of each individual student. Because schools identified as needs improvement based on the 2011 AYP data already have identified areas of need, the school improvement staff will work with each of these schools individually in shifting their data review and analysis to the CCRPI. School Improvement Plans and short term action plans will be implemented with interventions driven from the CCRPI report. (Appendix F, Flowchart)

In its proposed plan, the Georgia Department of Education (GaDOE) is requesting changes to the current Elementary and Secondary Education Act of 1965 (ESEA) consequence and reward structure that will be implemented during the 2012-2013 year. The revised plan for differentiated recognition, accountability, and support for all LEAs in Georgia builds from our state's history of working with schools in needs improvement status and analyzing the types of supports that provide the greatest impact on student achievement. This plan is designed to provide established supports and incentives for school improvement initiatives that flow from

the CCRPI system of accountability. The GaDOE aims to capitalize on the rich structure of the CCRPI to inform decisions about schools that will receive various supports. This consequence and reward system builds capacity for sustained school improvement initiatives that continue to impact school performance long after the state support is removed. A core objective of this system is to assist the local school personnel, teachers, administrators, and district level staff in understanding the processes involved in improving the quality of teaching and learning, thus improving the achievement of each individual student.

Based on an analysis of data since the implementation of No Child Left Behind, Georgia has detected a pattern of issues resulting from using needs improvement status alone to determine the concentration of resources provided to schools. Historically, schools with the fewest years in needs improvement status have been given minimal support. The process of identifying schools eligible for the School Improvement Grants (1003g) provided new insight and indicated that it may be valuable to consider multiple perspectives for the identification of schools needing support.

In reality, some schools have multiple issues but have not advanced in years of consequence because of a lack of subgroups or shifts in the content area of need. Throughout NCLB, Georgia has particularly experienced such a discrepancy between elementary and middle/high schools; due to the higher number of elementary schools feeding into middle/high schools, elementary schools often went unidentified if their student population did not meet specified quotas for a given subgroup. While these schools continued to make AYP, underlying issues were not addressed and these students failed to receive specific interventions or supports until middle or high school, often missing critical periods of development. By establishing an index system that accounts for this complexity, Georgia will have the capacity to identify and address these underlying issues sooner and provide more efficient support to students in all schools. Georgia's new plan offers a distinct advantage in that it enables the state to more effectively identify schools most in need of these supports and make school improvement decisions based on meaningful data that highlights specific needs of the school.

Schools identified for support will fall into two categories: Priority Schools and Focus Schools.

Priority School: A Priority school is a school that, based on the most recent data available, has been identified as among the lowest-performing schools in Georgia. The total number of Priority schools will be at least five percent of the all schools in the state, ensuring that the GaDOE serve at least five percent of Title 1 / Title 1 eligible schools. A Priority school is:

- a school among the lowest five percent of all schools in the State based on the achievement of the "all students" group in terms of proficiency on the statewide assessments that are part of Georgia's differentiated recognition, accountability, and support system; or
- a high school with a graduation rate less than 60 percent over a number of years.

Focus School: A Focus school is a school that, based on the most recent data available, is contributing to the achievement gap in Georgia. The total number of Focus schools will equal at least to the lowest-achieving ten percent of all schools in the state, ensuring that the GaDOE

serve at least ten percent of Title 1 / Title 1 eligible schools. A Focus school is:

- a school that has the largest combined *school to state* gap between a school's high needs students (HNS) and the state's non-high needs students (NHNS) on all statewide assessments and graduation rate;

In order to ensure that a maximum number of schools receive specified services and supports, Priority status will supersede Focus status. In the instance that a school would fall into both categories, Priority schools will be calculated first and those schools will not be eligible for Focus status.

These separate criteria establish categories that provide distinct, purposeful groups of schools and districts identified as needing specific supports and interventions. Priority schools are comprised of the lowest achieving schools in the state based on the performance of all students, while Focus schools are those in which the largest within school gaps in achievement exist. These categorizations will impact both the types of supports and interventions initiated and the students that will be targeted as part of a school's school improvement plan. Under this system, the GaDOE will be able to serve Georgia's overall lowest achieving schools as well as lowest achieving, high needs students in schools that are not traditionally captured in the lowest tier of schools based on all students' achievement. This system ensures that resources are used efficiently and in an organized way that targets appropriate groups of students.

In addition, the GaDOE will work with the district in facilitating support for schools identified as Priority or Focus. Short-term action plans will be developed at each school and will be monitored by a lead school improvement specialist. These lead school improvement specialists will work with identified LEAs, school staff, and the school improvement specialist assigned to the school in the development of these plans. The lead school improvement specialist is responsible for monitoring the implementation of the short term action plans, serving as a liaison with the school improvement specialists and LEA, and working directing with the school or LEA if implementation is not done with fidelity. The GaDOE will enter into a formal agreement with the LEA outlining the expectations of the LEA, school, and the GaDOE.

Reward School: The proposed system would reward schools based on exceptional performance on similar criteria specified for identifying Priority and Focus schools. Two categories of reward schools would recognize:

1. Highest Performing Title I Schools as those among the top 5% of Title I schools based on achievement of all students.
2. High Progress Title I Schools as those among the top 10% of Title I schools based on achievement gap closure score.

The proposed CCRPI also includes Performance Flags for each school that signal achievement measures disaggregated by subgroup. Because equity for all students must be at the forefront of all decisions regarding policy, implementation of standards, funding, and technical assistance provided by the GaDOE, these Performance Flags have been built into the CCRPI to promote and address equity for all students. These flags will allow stakeholders and school improvement specialists to identify underlying, systemic barriers that may be contributing to

achievement gaps. A particular strength of the CCRPI is that it will continue to support identification of these gaps and accountability within schools through reporting achievement for all subgroups with Performance Flags. This system, however, will operate parallel to the proposed differentiated recognition, accountability and support rather than driving it, and offer valuable insight about specific needs within a school. This subgroup data would be available for meaningful, proactive use by all schools rather than being tied to Met/Did Not Meet AYP determinations as in NCLB.

Because the GaDOE supports the quality implementation of the Common Core Georgia Performance Standards (CCGPS) as the most effective way to address equity for students in Georgia, school improvement efforts will address disparity where performance flags indicate discrepant patterns of performance for different subgroups by focusing on interventions that promote standards for underperforming groups. It is incumbent on the GaDOE to ensure that districts demonstrating patterns of disparity receive support and guidance regarding implementation of the Common Core Georgia Performance Standards, particularly as it relates to improving the achievement of economically disadvantaged students, English Learners, and students with disabilities and closing existing achievement gaps. In this way, school level performance flag indicators will be taken into account when formulating school improvement plans for Priority and Focus schools.

The school improvement specialists working with Priority and Focus schools have specific knowledge and expertise in the use of data analysis, school improvement, implementation and monitoring of school improvement plans, leadership development and instructional best practices. The work of the School improvement specialists is monitored by staff at GaDOE and professional learning for the specialists is on-going.

The GaDOE will also facilitate collaboration with other educational agencies such as Regional Education Service Agencies (RESA), colleges and universities, and regional labs to provide a statewide system of support for all schools.

Waiver Request from SES and Choice:

Based on the following state level data from SES and Choice, Georgia is also specifically requesting along with this waiver that the Supplemental Educational Services (SES) and Public School Choice (Choice) requirements for Title I schools as prescribed in NCLB be waived:

- The GaDOE data show that consistently less than 5% of eligible students take advantage of the Choice option. Georgia introduced a state law (O. C. G. A. §20-2-2130) in 2009 that provides an option for parents to request permissive transfers within districts, providing comparable options for parents and students. (Appendix C, 20-2-2130)

- Results from our annual analyses of SES show that, overall, students receiving SES in Georgia have not outperformed matched controls on state tests of achievement in any subject area for the duration of the program. Thus, the GaDOE is proposing an alternative supplemental tutoring intervention that would allow LEAs greater flexibility in designing an extended learning program tailored to needs of their school that would

have the capacity to serve more students in need of such additional support. These Flexible Learning Programs (FLP) would initially be funded through a minimum 5% set-aside requirement of Title I allotments for the same schools that are currently mandated to implement SES (those in year two of needs improvement status or higher based on FY11 AYP reports) and transition to all schools in Priority or Focus status by the 2013-2014 school year. (Appendix G, Analysis of SES Provider Effectiveness)

Specific components of the proposed program are outlined as Required Interventions for Focus and Priority Schools:

1. All Priority Schools must offer Flexible Learning Program (FLP)
2. All Focus Schools must offer Flexible Learning Programs (FLP)
3. In addition, all schools must develop a corrective action plan that outlines how the school will implement FLP
4. All Priority Schools and Focus Schools are required to send notices to parents describing the school's status, sharing data and information used to support programming decisions, and explaining how parents may become involved in improving the school.
5. All Priority Schools will be required to set-aside 10% of their school's Title I allocation for professional development.

1) Proposed College and Career Ready Performance Index (CCRPI) School and District Consequences:

Consequences for Priority Schools and Focus Schools will require schools to offer programs that are based on Supplemental Education Services (SES) but offer greater flexibility to LEAs. These new programs will improve the quality of service across the state, especially in rural districts, and provide more opportunities for parental involvement and input from local school boards about the types of interventions that are most appropriate for the schools in their communities.

Georgia LEAs will need to offer Flexible Learning Program (FLP) as a consequence for all Priority Schools and Focus Schools. LEAs implementing FLP will be required to submit a plan utilizing these consequences and a budget for approval by GaDOE Title Programs Division.

While students in Priority Schools and Focus Schools will be eligible to receive FLP based on low-income status and their individual student scores on state assessments, LEAs must prioritize Title I FLP funding and services to the students in Priority Schools and Focus Schools based on the following federal rank order:

- First —Students who are eligible for free or reduced priced meals and not meeting standards as identified by state assessment results; and if funding levels allow
- Second—Students who are eligible for free or reduced priced meals and

meeting standards as identified by state assessment results; and if funding levels allow

- Third—Students who are not eligible for free or reduced priced meals and not meeting standards as identified by state assessment results; and if funding levels allow
- Fourth—Students who are not eligible for free or reduced priced meals and meeting standards as identified by state assessment results; and if funding levels allow

2) As part of the submitted plan LEAs would need to:

- List the schools that are required to offer Flexible Learning Program (FLP), their CCRPI status (Priority Schools or Focus Schools) and classification by school and district and if they are a Title I school or not:

  Example:

  - LEA CCRPI Status (Priority School, Focus School) - School A - Targeted Assistance –Title I Status
  - LEA CCRPI Status (Priority School, Focus School) - School B – School wide –Title I Status
  - LEA CCRPI Status (Priority School, Focus School) - School C – Targeted Assistance –Title I Status

- Project how much they are intending to budget on Flexible Learning Program (FLP) in the following areas:

  1) Program Coordination/Service Delivery –District office and/or School
  2) Materials/Supplies – District office and/or School
  3) Transportation
  4) Snacks – What time of the day, if provided
  5) Tutor Costs – Current Teachers or Contract Instructors
  6) Total Cost of the FLP Program
  7) Total Cost of the PC Program
  8) Evaluation Method(s) to be used
     - Customer Satisfaction
     - Program Effectiveness

3) Required Program Data for the LEA to be maintained by school:

- Criteria used to determine how students were selected for the program and how the student's subject was determined
- Rank ordered list of all eligible students designating whether student is enrolled in the program or not. List should include students grade level and subject of tutoring
- Hours of tutoring attended for each student
- Staff hours of service

- Group size for tutoring
- Pre-assessment information for each student
- Post-assessment information for each student
- Goal or plan of tutoring for each student
- Progress toward goal by student
- Strategies to be used if goals not met by student
- When does FLP occur (before/after/during school, summer, intercession, weekends)
- The days of the week the FLP occurs
- How is transportation provided and for whom

4) Monitoring of LEAs/Schools by Title I Division:
LEAs will be monitored by the Title Programs Division based on the following items:

- Number of students Eligible for Program
- Number of students served
- Plan for offering services to and enrolling students across priority levels
- Number of staff hired with job descriptions
- Parental Involvement requirements
- Sign-in sheets for staff, students, and parents
- Assessment used by program
- Methods used to improve student(s) learning
- Monitoring of outcome on a monthly basis
- Verification of parent notification of eligibility for Flexible Learning Program
- Verification of parent notification of school status
- Verification of parent notification for how to enroll their student in Flexible Learning Program
- Program evaluation of Flexible Learning Program by school
- Program evaluation for overall LEA Flexible Learning Program

5) Evaluation of FLP Programs by SEA

Under the proposed waiver to grant LEAs flexibility to offer Flexible Learning Program (FLP), the GaDOE will monitor program data and evaluate performance according to the overall goal as stated in Title I, Part A legislation—increasing academic achievement on state assessments and attaining proficiency in meeting state standards. The evaluation will quantify core program components in an effort to highlight factors that contribute to effectiveness. Such a system would allow the GaDOE to use data analyses to develop data-driven best practices and provide training and ongoing support to LEAs that would promote continuous improvement of Flexible Learning Programs across the state.

Each Flexible Learning Program would be evaluated on the following dimensions:

- **Customer Satisfaction**
  - Evaluation Question: *What is the overall experience of stakeholders with the program?*
  - Data Source: Stakeholder surveys
- **Service Delivery**
  - Evaluation Question: *Are the SEA, LEAs and programs in compliance with laws*

and regulations?

- Data Source: Annual monitoring data, Program documentation, Federal reporting, Public reporting, Technical Assistance, etc.

- **Effectiveness**
  - Evaluation Question: *Are programs contributing to increased student academic achievement and performance on state education standards?*
  - Data Source: Student performance on state tests, Pre-post assessment measures of state standards and academic skills targeting by programs, CCRPI growth of schools offering FLP.

Evaluation results would be shared with stakeholders and the public and used to inform ongoing program improvement.

6) Transition of Flexibility Plan

The state will ensure that schools required to offer Supplemental Educational Services (SES) during the 2011-2012 school year will continue to offer services in the form of the proposed Flexible Learning Programs during the transition 2012-2013 school year. Beginning in the 2013-2014 school year, this program will become a set-aside requirement for schools in Priority or Focus status.

School Year	2011-2012	2012-2013	2013-2014 & Beyond
Transition status	Current year	Use of 2011 AYP Determinations	Full implementation of CCRPI
Title I Tutoring Requirement	SES	FLP	FLP
Title I Schools Required to Implement	NI2+ *	NI2+ *	Priority and Focus Schools
Number of Schools Implementing Programs	183	183	232**

*(based on 2011 AYP determinations)
**(estimate based on current number of Title I schools)

Section 1116(b), 1116(c) flexibility:

State and local educational agencies (SEA and LEA) responsibilities for notification and publicly reporting results will remain unchanged.

These strategies and requirements include:

- Require LEAs to notify parents of the availability of services at least twice annually.
- Require LEAs to provide at least one workshop/meeting explaining the LEAs plan for providing Flexible Learning Program (FLP) services.
- Assist LEAs in using local media to notify parents of services.
- Require LEAs to offer parents the opportunity to view first hand FLP services being provided for their children.
- Assist LEAs as they collaborate with parent/teacher/student organizations and other parent organizations to ensure wide dissemination of the availability of FLP and PC services.
- Assist LEAs as they work with local community organizations such as the, Chamber of Commerce, Lions Club, Kiwanis Club, etc. to devise additional strategies to notify eligible parents of FLP.

In order to increase future participation in FLP:

- The GaDOE will conduct a statewide media blitz to distribute information regarding the CCPRI.
- The Title Programs Division of GaDOE will provide regional workshops and web-based webinars to distribute information regarding the CCPRI.
- The Title Programs Division of GaDOE will post information regarding the flexibility changes for FLP on the department website.

Transition Timeline for Differentiated Recognition, Accountability, and Support System

The table below identifies the actions and timeline for implementation of a transition plan that ensures that the proposed differentiated recognition, accountability and support system will be fully implemented in the 2013-2014 school year.

Projected Timeline for Implementation	
Date	**Action**
November 2011	Finalize the College and Career Ready Performance Index
Jan-June 2012	Outreach and communication of the CCRPI to all stakeholders. Ongoing professional learning for School Improvement Specialists.
August/September 2012	Preliminary identification of Priority Schools and Focus Schools

September 2012	Initial release of CCRPI reports for all schools in Georgia. Continue to implement school and LEA support identified on 2011 AYP data during the 2012-2013 school year. School Improvement will shift the focus in working with schools from the traditional AYP data analysis to a focus on the data produced in the CCRPI Report. School improvement plans and initiatives will be driven by areas of need identified in the CCRPI with a focus on the subgroup data.
July 2013	Release and identification of Priority Schools and Focus Schools based on initial CCRPI calculations will inform differentiated recognition, accountability and supports for school improvement during 2013-2014 school year.

2. A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, Priority, and Focus schools.	☒ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, Priority, and Focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

a.

Percent of Students Performing at the Proficient Level on the 2011 High School End-of-Course Tests

CCRPI Level	Statewide Assessment	Student Group	2011 Proficiency Rate
High School	9th Grade Literature	All Students	82.1
High School	American Literature	All Students	87.7
High School	Biology	All Students	69.1
High School	Economics	All Students	72.7
High School	Mathematics I*	All Students	61.0
High School	Mathematics II**	All Students	57.2
High School	Physical Science	All Students	75.0
High School	U.S. History	All Students	64.6

* Mathematic I will be transitioning to Common Core Georgia Performance Standards (CCGPS) Coordinate Algebra

** Mathematics II will be transitioning to Common Core Georgia Performance Standards (CCGPS) Analytic Geometry

Percent of Students Performing at the Proficient Level on the 2011 Elementary and Middle Schools CRCT Tests

CCRPI Level	Statewide Assessment	Student Group	2011 Proficiency Rate
Elementary / Middle	English Language Arts	All Students	91.2
Elementary / Middle	Mathematics	All Students	84.4
Elementary / Middle	Reading	All Students	93.2
Elementary / Middle	Science	All Students	76.1
Elementary / Middle	Social Studies	All Students	74.8

(Attachment 8: "All Students" Proficiency, 2010-2011)

b. The College and Career Ready Performance Indices (CCRPI) include all state-mandated assessments currently administered in grades 3-12, referenced immediately above in a. For the Elementary CCRPI, grades 3-5 assessments include the Criterion Referenced Competency Test (CRCT), the CRCT-M (CRCT modified), ACCESS, and the Georgia Alternative Assessment (GAA). The CRCT, CRCT-M, and EOCT will be replaced by Common Core Assessments as they become available. In each content area, ELA, reading, mathematics, science, and social studies, the percent of student scoring at meets or exceeds is calculated at an identical weight. Additionally, the percentage of students scoring at meets or exceeds on the Grade 5 Writing Assessment is calculated at the same weight as the five content area assessments.

The inclusion of all content areas and writing holds schools more accountable for ensuring college and career readiness. The indicator capturing the Lexile scores of students in grades three and five further enhances the commitment to prepare students for middle school. The elementary CCRPI also holds schools accountable for positive growth in EL performance bands and positive growth in the percentage of students with disabilities being adequately supported to succeed in a general classroom environment.

In a commitment to provide significant career preparation, the elementary school CCRPI includes two career awareness indicators that carry the same weight as the afore-mention indicators. (Appendix E, CCRPI , ES) Categorical weights will be applied to derive the schools' achievement score, achievement gap closure score, and progress score, with the achievement score accounting for a majority of the combined score.

In middle school grades 6-8, proficiency assessments (CRCT, CRCT-M, ACCESS and GAA) are calculated in five content areas, as referenced above in a, and the Grade 8 Writing Assessment. Each assessment is calculated at an identical weight. The middle school CCRPI also holds schools accountable for positive growth in EL performance bands and positive growth in the number of students with disabilities served in the general classroom environment. The middle school CCRPI captures the Lexile score for grade eight, an indicator that strongly aligns with students being prepared for high school.

Again, the middle school CCRPI holds schools accountable in a more comprehensive manner for college and career readiness with the inclusion of two career preparatory indicators (Appendix F, CCRPI, MS). Categorical weights will be applied to derive the schools' achievement score, achievement gap closure score, and progress score, with the achievement score accounting for a majority of the combined score.

The CCRPI for high schools continues this very inclusive look at student achievement as it calculates the eight state mandated End of Course Tests (EOCTs), referenced above in a, and the Georgia High School Writing Test (GHSWT) plus nationally normed assessments including Advanced Placement exams, the ACT, the SAT, and internationally normed International Baccalaureate exams. Each of these indicators is calculated at an identical weight, thus holding schools more accountable than current requirements for student achievement measured only in ELA and mathematics.

The high school CCRPI places equal importance on three indicators that reference readiness for careers (Appendix G, CCRPI HS). Categorical weights will be applied to derive the schools' achievement score, achievement gap closure score, and progress score, with the achievement score accounting for a majority of the combined score.

As Georgia implements the CCGPS, the assessment blueprints will be adjusted to reflect any changes in grade level content standards and achievement expectations. As previously discussed in this document, the GPS is well aligned to the CCSS, allowing transition rather than complete redevelopment. With the implementation of the GPS beginning in 2006, Georgia has a successful history of significantly increasing the rigor of its assessment system. As the assessment system transitions, a review of performance expectations may be warranted. Georgia is working with its Technical Advisory Committee, comprised of six nationally renowned measurement experts, to navigate the transition during the interim years before the common assessments are implemented in 2014-2015. Georgia is a governing state within the PARCC consortium.

Prior to becoming a governing state in PARCC, Georgia has demonstrated its commitment to ensuring students were college and career ready upon graduation. Through the American Diploma Project, Georgia has partnered with its postsecondary agencies (the University System of Georgia and the Technical College System of Georgia) to set a college-readiness indicator on high school assessments. Postsecondary faculty from both agencies have served on standard-setting committees and been involved in the test development process through item review.

In addition to the above, Georgia is encouraging an increase in student achievement rigor through a multitude of ways.

- In April 2011, the State Board of Education adopted a Secondary Assessment Transition plan, beginning a phase-out of the Georgia High School Graduation Tests (GHSGT). Until this time, Georgia ran a dual assessment system at the high school level, mandating both the graduation tests as well as End of Course Tests (EOCT) in eight core content courses (two in each of the four content areas). Historically the GHSGT have been used for accountability but with the transition plan, accountability will now be based on the

EOCT. The EOCT are more rigorous assessments, measuring the content standards with more specificity as opposed to the GHSGT which reflect content standards across multiple courses.

- Through the CCRPI, Georgia has incorporated measures of post-secondary readiness with the inclusion of the SAT and ACT (percent of students achieving the college-readiness benchmark).
- Through the CCRPI, Georgia has incorporated a target Lexile reading score that is well above the Lexile score currently associated with the proficient standard at the specified grades. This target Lexile score sets a rigorous, yet attainable, goal for schools and was set in consideration of the text demands inherent in the Language Arts Common Core standards.
- Through the CCRPI, Georgia is encouraging schools to move students into the exceeds performance level (i.e., advanced).

Georgia's Growth Model

As part of Georgia's Race to the Top initiative, Georgia is developing a statewide growth model for implementation during the 2011-2012 year. Within Georgia, the infusion of a growth model moves accountability beyond attainment or status indicators (how many students achieved proficiency) towards information on both proficiency and student progress on statewide assessments. In its most basic form, Georgia's growth model compares the academic performance of students between two points in time (such as previous year and current year), however to attribute gains to educator and instructional programs, more precision is needed. A growth/value added steering committee, comprised of educators from across the state, has been meeting regularly since January 2011 to review different approaches and models. We anticipate the selection of the model will be made before the end of the calendar year.

Georgia will employ a growth model that will utilize both norm and criterion referenced data in making growth predictions -- norm-referenced information provides a consistent context in which to understand performance, along with achievement status relative to the academic performance of similarly positioned peers. Georgia further proposes the anchoring of a normative approach to proficiency standards on statewide assessments – growth to standard – with the standard providing the consistent criterion for all students. This approach provides information on whether student growth is sufficient to either achieve or retain proficiency within a specified time period such as an academic year. Georgia has utilized, and will continue to utilize, the expertise of both its Assessment Technical Advisory Committee and its Educator Effectiveness Technical Advisory Committee. Growth/value added model expertise included on these committees include Henry Braun (Boston College), Derek Briggs (University of Colorado), Ric Luecht (University of North Carolina, Greensboro), and Dan McCaffrey (Rand).

Georgia is in a unique position in its application of a student growth model. Georgia's content assessments standards clearly articulate a learning progression within each content area and across grades. Additionally, Georgia's assessments that provide sufficient precision across the full range of student achievement and the development of the GaDOE's K-12 longitudinal data system allows for linking of student data across number of years.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☒ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010□2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

i

SETTING PERFORMANCE TARGETS

The table below provides the Performance Targets to be used in the Performance Flags system of the CCRPI. The choice to utilize the All Student subgroup as the base for setting Performance Targets was purposeful as Georgia wants to convey consistently high standards for all subgroups. Following the prescribed formula articulated within the waiver guidance, the following algorithm was used to develop the Performance Targets moving out towards 2017:

$$(1)\quad \text{Annual Growth}^{*} = \frac{(100\% - \text{2011 Proficiency Rate}) * 0.50)}{6}$$

*Annual growth rounded to the tenth decimal place

In additional to sending a statewide message of high expectations for all students, the Performance Flags and Performance Targets will not only capture students who have met or exceeded the proficiency standard but also students who have made significant gains to get back on-track towards proficiency on the standards. The use of a student growth component allows the CCRPI and the Performance Flags to more efficiently deliver interventions to schools whose student subgroups are both not meeting proficiency standards or making significant growth towards standards.

Projected Performance Targets
Based on 2011 High School End-of-Course Tests (EOCTs) Proficiency Rates

CCRPI Level	Statewide Assessment	Student Group	2011 Proficiency Rate	2012 Performance Target	2013 Performance Target	2014 Performance Target	2015 Performance Target	2016 Performance Target	2017 Performance Target
High School	9th Grade Literature	All Students	82.1	83.6	85.1	86.6	88.1	89.6	91.1
High School	American Literature	All Students	87.7	88.7	89.7	90.7	91.7	92.7	93.7
High School	Biology	All Students	69.1	71.7	74.3	76.9	79.5	82.1	84.7
High School	Economics	All Students	72.7	75.0	77.3	79.6	81.9	84.2	86.5
High School	Mathematics I*	All Students	61.0	64.3	67.6	70.9	74.2	77.5	80.8
High School	Mathematics II**	All Students	57.2	60.8	64.4	68.0	71.6	75.2	78.8
High School	Physical Science	All Students	75.0	77.1	79.2	81.3	83.4	85.5	87.6
High School	U.S. History	All Students	64.6	67.6	70.6	73.6	76.6	79.6	82.6

Projected Performance Targets
Based on 2011 Elementary and Middle Schools Criterion Reference Content Test (CRCT) Proficiency Rates

CCRPI Level	Statewide Assessment	Student Group	2011 Proficiency Rate	2012 Performance Target	2013 Performance Target	2014 Performance Target	2015 Performance Target	2016 Performance Target	2017 Performance Target
Elementary / Middle	English Language Arts	All Students	91.2	91.9	92.6	93.3	94.0	94.7	95.4
Elementary / Middle	Mathematics	All Students	84.4	85.7	87.0	88.3	89.6	90.9	92.2
Elementary / Middle	Reading	All Students	93.2	93.8	94.4	95.0	95.6	96.2	96.8
Elementary / Middle	Science	All Students	76.1	78.1	80.1	82.1	84.1	86.1	88.1
Elementary / Middle	Social Studies	All Students	74.8	76.9	79.0	81.1	83.2	85.3	87.4

* Mathematic I will be transitioning to Common Core Georgia Performance Standards (CCGPS) Coordinate Algebra

** Mathematics II will be transitioning to Common Core Georgia Performance Standards (CCGPS) Analytic Geometry

In the same mindset as the Performance Targets for statewide assessments, the CCRPI also proposes to provide disaggregated feedback on each indicator within the Achievement Category of the CCRPI. The disaggregated feedback associated with non-statewide assessments will

provide additional information to be used in the school improvement process.

The heart of Georgia's plan for school improvement, accountability, communication with stakeholders, college and career readiness, and teacher and leader effectiveness is the CCRPI. The high school CCRPI was the first to be developed, emerging over a series of months of work with stakeholders and interest groups as outlined in Consultation. Each of the twenty indicators on the high school CCRPI is strongly correlated to college and career ready students. The middle school and elementary indicators are aligned to college and career readiness, as well. The idea behind the three indices is the underlying vertical support of one another. Success on the components of the elementary school index predicts both direct success on the middle school indicators and indirect success on the high school indicators. This same direct connect exists between the middle school indicators and the high school indicators. The aim was to develop a comprehensive and differentiated accountability system with the underlying support of college and career readiness.

The GaDOE proposes to use indicators and calculation methodology associated with the CCRPI to set ambitious but achievable Performance Targets in lieu of AMOs. This system with its more inclusive factors and tiered approach for scoring will lead to improved student achievement in Georgia. The CCRPI will require school leaders and classroom teachers to take notice of the growth on a range of validated indicators. Under AYP, many school leaders and teachers in Georgia have fallen into a habit of accepting a barely meets score in ELA/reading and mathematics on assessments primarily designed to measure adequacy, not excellence, as the goal of their work. Additionally, the subgroup constraints of AYP allow schools to hide their subgroup performance behind small student population sizes. The CCRPI requires schools to focus on multiple indicators designed to move all students from adequacy to excellence along with a more holistic focus on individual student and subgroup performance.

The GaDOE has vetted this plan with the Georgia Technical Advisory Committee (TAC). The plan outlined below benefitted greatly from the input provided by: Dr. Bill Mehrens of Michigan State University, R. Rick Leucht of the University of North Carolina at Greensboro, Dr. Mark Reckase of Michigan State University, Dr. George Englehardt of Emory University, Dr. Susan Embertson of the Georgia Institute of Technology, and Dr. Claudia Flowers of the University of North Carolina at Charlotte. Members of the TAC provided insight into not only theoretical considerations, but also the technical aspects of the methodology and how to make meaning connections to interventions.

The CCRPI model will capture scores in Achievement, Achievement Gap Closure, and Progress. Capturing three scores, rather than focusing on a single achievement score associated with only a few indicators, takes into account the broad work of a school that is necessary to ensure improved student achievement, effective implementation of college and career standards, significant intervention and support in specific areas, recognition of the good work of schools in many areas, and the relationship of student achievement to effective teachers and leaders. The use of a three-pronged approach allows schools and districts to receive a depth of feedback on each school's performance in these three critical areas. The combination of Achievement, Achievement Gap Closure, and Progress allows GaDOE to ensure increased quality in student achievement. It also supports schools achieving at a high-level while incentivizing continual

progress towards excellence, and a specified focus on ensuring additional support for the lowest achieving learners within a given school. The CCRPI summary score sheet includes a *Green, Red, and Yellow Flag* (Performance Flags) feature that illustrates the importance of achievement of students within traditionally recognized subgroups. (See Appendix K, Score Report) The most valuable lesson of AYP under No Child Left Behind is the importance of subgroup data analysis and a commitment to the achievement of all students, not 'resting' on the laurels of the high achieving students. GaDOE believes this enhanced score report will provide school staff, LEA staff, parents, and students a comprehensive look at a school that focuses on its performance highlights and performance challenges. This report will assist schools in designing a school improvement plan that targets data-identified needs not only in achievement but in achievement gap closure, school progress, and a more expansive and extensive look at subgroups than currently offered under AYP.

OVERALL SCORE

Using the three-pronged approach, Georgia will calculate an overall CCRPI score to be used within the single statewide accountability system. This score will rest predominantly on a school's current Achievement Score, but will also take into consideration a school's Achievement Gap Closure and its Progress towards 100% proficiency. The weighted average of the Achievement Score, the Achievement Gap Closure Score (AGCS), and the Progress Score determines the first three steps in a four step calculation of a school's overall CCRPI score. To further enhance best practices clearly aligned with college and career readiness, the CCRPI includes a companion set of *Factors for Success* indicators. Schools meeting set targets on some or all of these indicators will experience up to three points in addition to the average score determined by the Achievement, Achievement Gap Closure, and Progress scores. (Appendix B, Factors for Success, 3 levels)

PERFORMANCE FLAGS

While the overall score will be the primary driver of the single statewide accountability system, the Performance Flags will be the primary engine for school and LEA interventions. The Performance Flags will provide schools with readily accessible feedback on their subgroup achievement and student growth on the various indicators. Using the achievement on statewide assessments, schools will receive Green, Red and Yellow Flags for each subgroup based on its actual achievement and student growth as related to an annual Performance Target. Red Flags will indicate performance challenges: subgroup performance and growth below the Performance Target; and Green Flags will indicate performance highlights: subgroup performance significantly above the Performance Target. Yellow flags indicate subgroups making the Performance Target by including the students who are not proficient but make significant student growth. Red Flags and Yellow Flags will clearly guide schools in designing their school improvement and Green Flags will offer well-deserved recognition for effective teaching and learning and exemplary student achievement. The use of the Performance Flags, particularly the Red and Yellow Flags, combined with Performance Targets meets reporting requirements for subgroups and annual performance.

For any subgroup not scoring at a satisfactory achievement level a *Red Flag* will display. For

schools not identified as Focus or Priority schools in section 2.A., the *Red Flag* will trigger specific support to all schools from divisions within the GaDOE to include curriculum, English Language Learners, and students with disabilities. Schools will be able to use these inclusive scores and wealth of disaggregated data to direct their school improvement. The system of Red and Yellow Flags will guide a plan designed to address the unique and specific needs of each individual school. These plans will be presented to LEA staff for review and further refinement and action. School Improvement Specialists for Title I-served schools and LEA and RESA staff for non-Title schools will use these plans to identify resources to target needs unique to a school, avoiding a non-focused approach that has often occurred in past years and has not resulted in improved student achievement in Georgia. As flag data is utilized in the first several years of implementation, performance of subgroups will be more visible than in the past.

Refer to the CCRPI Logic Model (page 20) for more information on the integration of the Performance Flags into both the Single Statewide Accountability System and the school and district level interventions.

ACHIEVEMENT SCORE

Under NCLB and AYP, 100% proficiency was the goal for all students. The current proposal holds to the core principles that every student should be ready for either a post secondary institution or a professional career upon graduation. The CCRPI Achievement Score was derived with 100% proficiency as the goal. In order to receive maximum points within the Achievement Score on each indicator, schools would need to achieve 100% proficiency on each indicator. However, the CCRPI provides schools with the opportunity to receive relative points based on their current performance. For example, a school achieving at 90% proficiency on a specific indicator would receive 90% of the possible points. This is different than the current dichotomous system under AYP which only rewards schools for achievement at or above the specified AMO. The current AYP stifles the GaDOE's attempts to raise the bar across the state. Combining a 100% maximum with relative points, provides schools with a rigorous plan for maximum achievement while obtaining points as they move towards complete proficiency.

The indicators included within the Achievement Score will be broken into categories. High school categories include graduation rate, student attendance, post secondary readiness and content mastery. Middle school categories include content mastery and preparation for high school, student attendance, supports and interventions, and career exploration. Elementary school categories include content mastery and preparation for middle school, student attendance, supports and interventions, and career awareness. These categories will vary among the high school, middle school, and elementary school indicators. (Appendix A CCRPI, 3 levels) Within each category, the indicators will be weighted identically and then aggregated to the category level. The categories will be weighted in a differentiated way to signal not only state priorities but also optimal weights related to the college and career readiness. The weighted average of these categories will produce the Achievement Score. The Achievement Score under CCRPI reflects Georgia's commitment to continual school improvement, including annual statewide assessments and other academic and career-focused indicators.

In order to the allow schools to not only build capacity, but also develop rigorous programs, the

CCRPI takes into account the need to hold all schools to high achievement goals and yet ensure schools are incentivized. For example, the *post high school readiness category* on the high school CCRPI will be calculated on the eight highest indicators of the ten listed, on a school by school basis. (Appendix J, CCRPI, HS) Three years of data indicate that all high schools have opportunity for scores in at least eight of these ten indicators. This flexible calculation will allow high schools adequate time to make programmatic changes and identify instructional funding for supporting these rigorous indicators.

ACHIEVEMENT GAP CLOSURE SCORE

Complimenting the Achievement Score is the Achievement Gap Closure Score (AGCS). The AGCS compares annual progress of the *within school* achievement gap and the *school to state* achievement gap. The GaDOE aims to decrease the percent of all students and students in each subgroup not meeting proficiency by 50% by 2016-2017. (See Performance Flags above). The AGCS score differs from the Achievement Score in that only student performance indicators based on state assessments are calculated. High schools will be evaluated on eight statewide assessment indicators; middle schools on seven statewide assessment indicators; and elementary schools on eight statewide assessment indicators. For each school, the achievement gap measure will be set annually in equal bands that promote closure by 2019-20. A school's achievement gap will be determined by identifying the school's lowest 25% of learners (across all subgroups) and classifying this 25% as the school's *High Needs Students* (HNS). To close the *within school* gap, the average score of the school's HNS will be compared to a school's 75th percentile score representing a schools *Non High Needs Students* (NHNS). The identification of HNS and NHNS will be done on the most recent statewide assessment prior to entering a specified grade level. For example, HNS and NHNS for the elementary schools will be based on the third grade reading and mathematics CRCTs; for middle schools these groups will be based on the fifth grade reading and mathematics CRCT; and for high schools based on the eighth grade reading and mathematics CRCT; or the corresponding CRCT-M, GAA, or ACCESS for qualifying students. By identifying students prior to any interventions completed by a given school, it allows the AGCS to capture the effect of a school on gap closure.

Georgia agrees that attention to the within school achievement gap is important; however, Georgia contends that the gap between the school and the state is also essential in ascertaining a holistic view of a school's gap performance. This is particularly true for the lowest performing schools in the state that might have little variation in their student performance within the school but have a substantial gap to statewide averages. Georgia proposes to include a *school to state* gap within its AGCS calculations. To close the *school to state* gap, the average score of the school's HNS will be compared to the state's 75th percentile scores, NHNS. Evaluating achievement gap closure *within school* as well as *school to state* encourages all schools to close the gap without lowering the ceiling. In schools with the greatest *school to state* achievement gap, this growth measure, while ambitious, is achievable.

Using the HNS approach ensures that students are identified and addressed based on their needs and not their characteristics. Georgia's approach to indentifying a subgroup for gap closure is based solely on student achievement rather than group membership. By not assuming poor performance based on subgroup membership, this approach will allow Georgia to more

systematically capture the students with the greatest needs and break down assumptions held by some that all members of certain subgroups are low-performing. Finally, this approach allows Georgia schools to highlight high performance of members within subgroups who have traditionally been classified as low performing.

Georgia agrees that ensuring the core principles behind traditional subgroup disaggregation is important within a statewide accountability system. In an effort to demonstrate the efficiency of HNS classification, research from the GaDOE has indicated that our HNS include all traditionally defined subgroups as indicated under NCLB. ELs and SWD students are also very prominent within our HNS in Georgia. The use of the HNS group allows Georgia to systemically identify all students (regardless of subgroup size) who are in most need of differentiated instructional interventions. The use of HNS also accounts for the inherent multiple membership students could possibly have under the traditional disaggregation of AYP. By removing the multiple counts, this approach to gap closure provides a fair and robust representation across schools regardless of subgroup sizes. Below is a table outlining the distribution of students within the high needs category by their traditional subgroup disaggregation.

Projected Percent of Subgroup Inclusion within the 2010 High Needs Achievement Gap Closure Group		
Student Group	**School High Needs**	**State High Needs**
American Indian / Alaskan	39.75	33.25
Asian / Pacific Islander	24.26	15.43
Black	44.81	46.36
Hispanic	44.76	40.37
Multi-Racial	34.69	27.59
White	32.49	24.86
Economically Disadvantaged	46.75	46.79
Limited English Proficient	56.45	55.98
Students with Disabilities	71.08	67.12

PROGRESS SCORE

The Progress Score will capture annual progress for schools (movement on each indicator) with the infusion of student growth as the secondary component once a statewide growth model is fully implemented. The distinction between progress and growth is an important one to Georgia's proposal. Within the CCRPI progress is a school-level measure targeted at assessing a school's ability to move its collective performance. Growth is a student-level algorithm that uses the statewide selected growth model to predict a student's performance and compare it to his or her actual score. The uniqueness of Georgia's Progress Score is that it will include both school-level progress and student-level growth within its calculation methodology.

In addition to the including both school-level progress and student growth, the Progress Score metric will utilize a tiered approach that awards points to schools with the largest gains to make while not penalizing schools who are already performing at an exceedingly high level. Using a progress model will allow schools performing under the expected benchmark to have an aggressive Individualized Progress Goal (IPG) while schools at or exceeding the expected benchmark will have a Standardized Progress Goals (SPG). The tiered structure provides

appropriate incentives to ensure the most efficient progress across the state.

Tiered benchmarks are set at two different levels, Expected and Exemplar. By 2016-2017 all schools in the state of Georgia should achieve the Expected or Exemplar benchmark. IPG and SPG are identified for each school based on progress tiers described below:

Level 1: Below Expected Benchmark
Schools achieving below the Expected benchmark will have an IPG that is an annual target of meeting or exceeding the Expected benchmark by 2016-2017. For example, a school with a gap to the expected benchmark of 30 must grow in annual increments of 5% to reach the Expected benchmark in 2016-2017. Failure to meet the IPG results in diminished progress points.

Level 2: Above Expected Benchmark but Below Exemplar Benchmark
Schools achieving above the Expected benchmark but below the Exemplar benchmark will be required to grow a standard amount annually (SPG), on each of the indicators. Failure to meet the SPG results in diminished progress points.

Level 3: Above Exemplar Benchmark
Schools achieving above the Exemplar benchmark will be expected to maintain their current levels of achievement (within a statistically viable margin of error), among all students and students in each subgroup, without any specified progress goal. Given that the Exemplar benchmark will be set high, schools in this level will display consistently high achievement across the spectrum of indicators.

The Expected and Exemplar benchmarks within the Progress Score will mirror the Performance Targets set within the Performance Flag system (see Performance Flags). The identified Performance Target for proficiency will be the Expected Benchmark for Progress indicators and the Exemplar Benchmarks for Progress indicators will be set using data from high achieving schools.

FACTORS FOR SUCCESS

The *Factors for Success* indicators are research-based indicators aimed at improving college and career readiness but not systematically used or funded statewide. Identifying factors of success as significant indicators for moving from adequacy to excellence, companion indicators may add as many as three bonus points to the overall CCRPI score for a school. The Factors for Success Companion Index will be fluid and afford opportunities for schools and districts to propose future indicators. (Appendix B, Factors for Success, 3 levels)

FINANCIAL EFFICIENCY RATING

Given the importance of efficient and effective use of financial resources, the CCRPI will provide insight to school and LEA administrators about spending that is targeted for student achievement. This metric will provide information about the impact of instructional expenses on student achievement and CCRPI outcomes. Using a five-star rating system,

schools will be provided insight into how their federal and state dollars spent are impacting student achievement and school improvement. Actual achievement and resource efficiency will be two of the components used to derive the final rating, as well as student participation in standardized testing. While the Financial Efficiency Rating will not factor into a school's accountability plan, it will provide vital information on leading indicators that impact future school success. (Appendix K, Score Report)

SCHOOL CLIMATE RATING

The development of the School Climate Rating will be based on a rating system similar to the Financial Efficiency Rating. Specifically, the School Climate Rating will utilize data from Georgia's Student Health Survey II (GSHSII), an annual collection of data on environmental and behavior indicators. In 2014-2015, the School Climate Rating will also include data from the Georgia Teacher Effectiveness Measure (TEM) and Georgia Leader Effective Measure (LEM) which will include teacher and parent survey instruments being developed in conjunction with Georgia's *Race to the Top* plan. The GaDOE is working closely with AdvancEd to insure that survey tools associated with school accreditation are mirrored in tools GaDOE will use. Research, most notably that of Dr. Bob Balfanz of Johns Hopkins University, supports the use of a school climate metric as an early indication of future increases or declines in student achievement and graduation rates. Given that the School Climate Rating will not factor into a school's overall accountability scores, the diagnostic nature of this metric will help schools understand the importance of school culture and will be used to direct school improvement in a manner that better ensures a positive and safe school environment. (Appendix K, Score Report)

PARTICIPATION

One of the core tenants and more productive parts of the AYP reporting structure under NCLB is its commitment to annual testing and ensuring high levels of participation within those assessments. The proposed CCRPI will continue to include participation as an overall factor in the statewide accountability system. Combining the rigorous indicators within the CCRPI, the innovative way of capturing all High Needs Students, with the participation component will ensure schools and districts receive complete feedback on all student performance.

2.C REWARD SCHOOLS

2. C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

Georgia proposes to identify two categories of Reward schools annually:

1. Highest Performing Title I Schools as those among the top 5% of Title I schools based on achievement of all students.
2. High Progress Title I Schools as those among the top 10% of Title I schools based on achievement gap closure score.

Highest Performing schools will be calculated based on an achievement ranking of all Title I schools in Georgia. The highest 5% of schools as defined by the CCRPI achievement index will receive this distinction.

High Progress schools will be calculated based on an achievement gap closure ranking of all Title I schools in Georgia. The highest 10% of schools as defined by the CCRPI gap closure index will receive this distinction.

The GaDOE believes that these are meaningful reward categories that will recognize those schools among the highest in overall student achievement and those making the most significant progress closing within school achievement gaps. Further, this system will provide the opportunity for schools to receive reward distinctions while in Focus or Priority status, creating both incentives for effective school improvement and providing resources for schools to reinvest and in grow effective interventions for their students.

2. C.ii Provide the SEA's list of reward schools in Table 2.

2. C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Georgia will recognize Highest Performing and High Progress Title I schools in June of each year at the Annual Title Programs Conference. Further, these schools will each receive a monetary reward equal to Georgia's total reward allotment divided by the total number of reward schools. The Title I Highest Performing and High Progress school districts are chosen for designation by the Office of State School Superintendent and approved by the State Board of Education (SBOE) each year. Funding for the Highest-Performing and/or High-Progress Districts is budgeted in the state educational agency administration budget.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as Priority schools.

Priority School: A Priority school is a school that, based on the most recent data available, has been identified as among the lowest-performing schools in Georgia. The total number of Priority schools will be at least five percent of the all schools in the state, ensuring that the GaDOE serve at least five percent of Title 1 / Title 1 eligible schools. A Priority school is:

- a school among the lowest five percent of all schools in the State based on the achievement of the "all students" group in terms of proficiency on the statewide assessments that are part of Georgia's differentiated recognition, accountability, and support system; or
- a high school with a graduation rate less than 60 percent over a number of years.

Proposed data points that will inform the identification of schools and provision of interventions and support will come from the Achievement Scores of the CCRPI. Insert methodology here.Insert methodology here.

2. D.ii Provide the SEA's list of Priority schools in Table 2.

2. D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with Priority schools will implement.

A school identified as a Priority school will receive the support of the School Improvement Division of the GaDOE. This support may be through assignment of a school improvement specialist who will work with the school on a regular basis and may bring in other staff to support identified areas for growth. Support for schools needing comprehensive services will be provided by the GaDOE school improvement specialists and will be coordinated with other initiatives such as School Improvement Grants (1003g) and Race to the Top.

Districts will sign a memorandum of agreement with the GaDOE on behalf of Priority schools. The memorandum of agreement will outline a set of non-negotiable actions and interventions required of each priority school aligned with the turnaround principles. These non-negotiable actions and interventions include, but are not limited to, the following.

Non-Negotiable Actions and Interventions	Turnaround Principle
1. Assess the performance of the current principal. If necessary, replace the principal. Work collaboratively with GaDOE to develop criteria for selection of an effective turnaround principal.	Turnaround Principle 1
2. Work collaboratively with GaDOE to analyze data and root causes to identify actions, strategies, and interventions for the school improvement plan.	Turnaround Principle 2
3. Participate in required professional learning provided by the GaDOE.	

4. Hire an instructional coach to engage teachers in school-based, job-embedded professional learning.	
5. Work collaboratively with GaDOE to screen teachers transferring to the priority school.	
6. Provide additional learning time for students.	Turnaround Principle 3
7. Provide time during the regular school day for teachers to collaboratively plan instruction to address the content of the CCGPS and student learning needs.	
8. Offer Flexible Learning Programs.	
9. Implement the GaDOE Common Core Georgia Performance Standards frameworks in ELA and Mathematics.	Turnaround Principle 4
10. Participate in a state-led Georgia Assessment of Performance on School Standards (GAPSS) Analysis.	Turnaround Principle 5
11. Develop and implement short-term action plans to achieve the goals in the school improvement plan.	
12. Develop a leadership team and meet a minimum of two times per month to develop and implement short-term action plans and monitor implementation of the school improvement plan.	
13. Analyze teacher attendance and develop a plan for improvement if needed.	Turnaround Principle 6
14. Analyze student attendance and develop a plan for improvement if needed.	
15. Identify students who are at-risk of not graduating and develop a plan of action for supporting those students.	
16. Analyze student discipline referrals and develop a plan for improvement if needed.	
17. Develop and implement a plan for student, family and community engagement.	Turnaround Principle 7
~~18.~~ Ensure that parent notices and family engagement components are adequately adopted in Flexible Learning Programs.	
Priority schools will be assigned a GaDOE school improvement specialist to provide support and technical assistance with implementation of the non-negotiable actions and interventions. In addition, a GaDOE lead school improvement specialist will regularly monitor implementation of the non-negotiable actions and interventions.	

Turnaround Principle 1

Once schools have been identified as Priority schools, the GaDOE will work in collaboration with the district to assess the performance of the current principal. In addition, the GaDOE will review school achievement trend data for the school(s) the principal previously served to determine the principal's track record in improving student achievement. Based on the review, the GaDOE and the district will determine whether or not to replace the principal. Criteria will

be developed and used to standardize the decision regarding replacement of the principal. If the district makes the decision to replace the leadership, the GaDOE will work with the district to develop criteria for selecting effective turnaround leaders.

The GaDOE will develop a memorandum of agreement with each district that provides flexibility to turnaround principals in the areas of scheduling, staff, curriculum, and budget.

Turnaround Principle 2

In Priority schools, GaDOE school improvement specialists will work with the school leadership to review the quality of staff members. This review will include student achievement trend data included in the Longitudinal Data System (LDS) at the individual teacher level. Teachers transferring to the Priority school will be screened to prevent the selection of ineffective teachers. The GaDOE staff will work collaboratively with districts to make decisions regarding transfers of teachers to Priority schools.

The GaDOE will develop a memorandum of agreement with each district to ensure processes and policies are in place to prevent the transfer of ineffective teachers to Priority schools.

Georgia is committed to developing a comprehensive teacher evaluation system that focuses on providing feedback regarding the implementation of standards based instruction of the Common Core Georgia Performance Standards. The cycle included in this teacher assessment process includes the use of conferencing, observation, and self reflection.

Upon identification, priority schools will be provided professional development and technical assistance addressing leadership, the school improvement process, school standards, implementation of the CCGPS, and implementation of job-embedded professional learning. Strategies to engage English learners, students with disabilities, and economically disadvantaged students in the CCGPS will be at the forefront of all professional development provided to priority schools.

Turnaround Principle 3

The use of time is critical in ensuring that all students have an opportunity to learn. Georgia has flexibility across districts in the determination of school calendars and length of school day. Although there is a minimum time allocation, districts can configure the length of day and number of days in a variety of ways that meets the needs of the students. The use of data analysis included in the School Keys enables a school to examine practices and processes currently being implemented, practices and processes that need to be eliminated, and practices and processes that need to be expanded. School improvement specialists will work with the leadership teams in schools to assess current schedules and school calendars, and make appropriate revisions to provide additional learning time for students and additional learning time for teachers.

Turnaround Principle 4

The importance of an effective teacher for every student in every classroom is documented throughout current research. The GaDOE has adopted the Common Core State Standards. Providing multiple opportunities for teachers to master the implementation of the Common Core

Georgia Performance Standards (CCGPS) is essential. The school improvement specialists that will serve the priority schools are provided with professional learning opportunities to strengthen their understanding of research-based instructional practices and programs (e.g., differentiated instruction, formative assessment strategies, etc.). The school improvement specialists will provide support with selection of research-based actions, strategies, and interventions for the school improvement plans and provide onsite support with implementation. The GaDOE has also developed frameworks and lessons that address rigor for all students. Georgia has a strong history of working with the Regional Educational Service Agencies (RESA) in supporting the implementation new curriculum. RESAs are currently involved in all GaDOE sponsored professional learning on the CCGPS and aligned assessments. The development of formative assessments that guide instruction is being done at the district and regional level. The School Improvement Division supports this work through on-going collaboration with the RESAs and by providing training for Instructional Coaches.

Turnaround Principle 5

Upon identification, Priority schools will participate in a state-led GAPSS analysis. Through the GAPSS analysis diagnostic process a variety of data are collected from multiple sources to assess the status of a school on each of the school standards. The data are combined to inform the results of the GAPSS analysis, which, in turn, informs the development and implementation of school improvement initiatives.

The Priority schools will attend a summer leadership academy for school-based leadership teams. This intensive, week-long professional learning opportunity engages participants in the use of school data to inform the continuous improvement process. School teams are actively engaged in the school improvement process throughout the academy. Sessions provide support to school teams with the following actions.

- Establishing a data-driven leadership team
- Collecting and analyzing the four types of data (student achievement data, process data, demographic data, and perception data) including the results from the GAPSS analysis
- Determining root causes
- Developing SMART goals
- Selecting research-based strategies, actions, and interventions to meet school improvement goals
- Identifying artifacts and evidence of implementation
- Creating a professional learning plan to support implementation
- Designing a plan for monitoring implementation of the school improvement plan

Leadership teams complete the academy with a product, a systematically and deliberately developed school improvement plan that is aligned to current, relevant school data and ready to be implemented and monitored immediately.

The school improvement specialist assigned to the priority school will provide ongoing technical assistance to support implementation of the school improvement plan. Actions, strategies, and

interventions from the school improvement plan become the primary focus of the priority school. While school improvement specialists facilitate the development and implementation of short-term action plans to achieve the goals of the school improvement plan, lead school improvement specialists conduct regularly scheduled site visits to monitor implementation. A balance of support and pressure will ensure that priority schools have the necessary tools needed and are accountable for improving student achievement.

Priority schools will be provided technical assistance on the use of the Statewide Longitudinal Data System. This tool will allow teachers and administrators to access timely and relevant data when planning and revising instruction. The Statewide Longitudinal Data System (SLDS) allows teachers to rapidly see student data from the current as well as previous years. The SLDS allows for quick and easy analysis of the accumulated data for both individual students and groups of students. Access to such information supplies teachers with a better understanding of the needs of their students. Consequently, instruction guided by data is more likely to support and enhance the academic performance of all students.

In addition, school improvement specialists will support administrators and teachers in the collection of the four types of data and the use of the data to make instructional decisions. The memorandum of agreement will require school leadership to meet a minimum of once every two weeks to analyze data, assess progress toward school improvement goals, and determine actions to support implementation. In addition, the memorandum of agreement will require collaborative planning time during the school day for teachers. School improvement specialists will provide support and technical assistance to ensure effective use of leadership team meetings and collaborative planning time.

Turnaround Principle 6

School improvement specialists will facilitate the analysis of teacher and student attendance data. Based on the analysis, Priority schools will include actions and interventions to address issues and concerns with teacher and student attendance in the short-term action plan. School level staff members will continuously track and monitor teacher and student attendance and make adjustments to the plan accordingly. Lead school improvement specialists will monitor implementation of actions and interventions to increase teacher and student attendance during site-based monitoring visits to Priority schools.

Turnaround Principle 7

Require a plan for family and community engagement;
Ensure all family and community engagement plans are in place as required;
Family Engagement Conference.

Priority schools will also be required to offer Flexible Learning Programs (FLP) through a 5% set-aside of their Title 1 allotments. Refer to 2.F

At the end of each year, the GaDOE will carefully review summative data and all indicators from the CCRPI to assess progress of Priority schools. In collaboration with school districts, adjustments will be made based on data to the non-negotiable actions and interventions for each individual Priority school.

Insert description here.

2. D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more Priority schools implement meaningful interventions aligned with the turnaround principles in each Priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

The table below identifies the actions and timeline for implementation of a transition plan that ensures that the proposed differentiated recognition, accountability, and support system will be fully implemented in the 2013-2014 school year.

Projected Timeline for Implementation	
Date	**Action**
November 2011	Finalize the College and Career Ready Performance Index
Jan-June 2012	Outreach and communication of the CCRPI to all stakeholders. Ongoing professional learning for School Improvement Specialists.
August/September 2012	Preliminary identification of Priority Schools and Focus Schools
September 2012	Initial release of CCRPI reports for all schools in Georgia. Continue to implement school and LEA support identified on 2011 AYP data during the 2012-2013 school year. School Improvement will shift the focus in working with schools from the traditional AYP data analysis to a focus on the data produced in the CCRPI Report. School improvement plans and initiatives will be driven by areas of need identified in the CCRPI with a focus on the subgroup data.
July 2013	Release and identification of Priority Schools and Focus Schools based on initial CCRPI calculations will inform differentiated recognition, accountability and supports for school improvement during 2013-2014 school year.

This timeline will provide a transition year that allows for Georgia's Accountability staff to dedicate their time to establishing an effective process for collecting and analyzing all components of the CCRPI in an accurate and timely manner. During that time, school improvement services and consequences will continue to be based on FY11 NI status. However, these services will be informed by various data from the CCRPI. The proposed Reward schools will be implemented the 2012-2013 school year.The proposed CCRPI and differentiated

recognition based on Priority and Focus groups will be fully implemented at the onset of the 2013-2014 school year.

2. D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits Priority status and a justification for the criteria selected.

The annual 'run' of data based on achievement indicators will identify Priority Schools. Schools no longer falling into the lowest 5% will be exited; however, the Regional Education Service Agencies will continue providing support to these schools for two additional years.

2.E FOCUS SCHOOLS

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "Focus schools."

Focus School: A Focus School is a school that, based on the most recent data available, is contributing to the achievement gap in Georgia. The total number of Focus Schools will equal at least to the lowest-achieving ten percent of all schools in the state, ensuring that GaDOE serves at least ten percent of Title 1 / Title 1 eligible schools. A Focus School is:

- a school that has the largest combined *school to state* gap between a school's high needs students (HNS) and the state's non-high needs students (NHNS) on all statewide assessments and graduation rate;

Proposed data points that will inform the identification of schools and provision of interventions and support will come from the Achievement Gap Closure Scoring section of the CCRPI.

Insert methodology here.

2. E.ii Provide the SEA's list of Focus schools in Table 2.

2. E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more Focus schools will identify the specific needs of the SEA's Focus schools and their students and provide examples of and justifications for the interventions Focus schools will be required to implement to improve the performance of students who are the furthest behind.

Once a school has been identified as a Focus school, the GaDOE will work in collaboration with the district to analyze student achievement data to identify the largest gaps between groups of students. Based on the analysis of data, the district and the GaDOE will determine the interventions for the Focus school. Districts will sign a memorandum of agreement with the GaDOE on behalf of Focus schools. The memorandum of agreement will outline a set of non-negotiable actions and interventions required of each Focus school. These non-negotiable actions and interventions include, but are not limited to, the following.

Non-Negotiable Actions and Interventions
1. Provide additional learning time for students.
2. Work collaboratively with the GaDOE to analyze data and root causes to identify actions, strategies, and interventions for the school improvement plan that support the needs of underperforming subgroups and high needs students.

3. Prioritize access to programs and resources to promote achievement based on underperforming subgroups and high needs students.
4. Participate in required professional development and leadership training initiatives to improve teaching and instruction service delivery for high needs students and underperforming subgroups.
5. Provide time during the regular school day for teachers to collaboratively plan instruction to address the content of the CCGPS and student learning needs. Specifically, ensure that regular education teachers have scheduled time to collaborate with special education teachers and English language learners specialists.
6. Develop and implement short-term action plans to achieve the goals for the lowest-performing subgroups and high needs students.
7. Analyze teacher attendance and develop a plan for improvement if needed.
8. Analyze student attendance and develop a plan for improvement if needed.
9. Analyze student discipline referrals and develop a plan for improvement if needed.
10. Develop a leadership team and meet a minimum of two times per month to develop and implement short-term action plans and monitor implementation of actions and interventions to support the lowest-performing subgroups and high needs students.
11. Focus Schools will be required to offer Flexible Learning Programs.
The GaDOE will provide district level support to districts with focus schools. The GaDOE will offer support from specialists in the areas of English learners, students with disabilities, and economically disadvantaged students. In addition, the GaDOE will broker services from other support agencies (e.g., Regional Educational Service Agencies (RESAs), Georgia Learning Resource Services (GLRS), etc.) to meet the specific needs of the focus schools.

Focus Schools will provide additional learning time for students. The additional learning time provided by schools must be in one of the following areas.

a. Core academic areas
b. Enrichment activities
c. Time for teachers to plan, collaborate, review data, and participate in professional development.

Focus schools will engage in a review of how current time is being used along with the strategic addition of more time to better meet students' needs.

Upon identification of Focus schools, the GaDOE will work with district level staff to analyze data and root causes to identify actions, strategies, and interventions for the school improvement plan that support the needs of underperforming subgroups and high needs students. The GaDOE will strategically assign staff members with expertise in supporting underperforming subgroups and high needs students to districts with Focus schools.

The GaDOE will prioritize access to programs and resources to promote achievement based on

underperforming subgroups and high needs students. Focus schools will receive immediate access to newly developed tools and resources offered to school in Georgia. Districts will be expected to provide additional resources to Focus schools.

Focus schools will develop and implement short-term action plans which delineate the actions they will take to provide targeted support to underperforming subgroups and high needs students. The short-term action planning process will ensure that Focus schools immediately take action to implement the non-negotiable actions and interventions. To facilitate prioritizing immediate goals, the following process may be used.

1. Review the actions, strategies, and/or interventions from the school improvement plan. Review recent awareness walk results, data from classroom visits, and recent formative assessment data.

2. Based on this review, narrow the focus to specific strategies that need to be addressed in a short-term action plan. Write these in the "Action Steps" column. The action steps need to identify the timeline and person responsible. The short -term action plan needs to include specific artifacts and evidences to define expectation.

3. Communicate to all stakeholders the identified target areas and implementation steps the school will focus on during the next quarter. This may be accomplished by discussing the plan during collaborative teacher meetings, posting the action plan in the data room, sharing expectations with students, etc.

4. Implement the short-term action plan.

Leadership teams in Focus schools will monitor implementation of the short-term action plans to assess progress of the support being provided to underperforming subgroups and high needs students. The leadership team will engage in the following process to monitor implementation of the short-term action plans.

1. Revisit the short-term action plan as a standing leadership team agenda item. The agendas of the leadership team meetings should be aligned to the prioritized strategies outlined in the short-term action plans. The role of the leadership team is to determine weekly/biweekly actions that must be accomplished and barriers that must be removed in order to reach full implementation of the short-term action plan. The agendas and actions planned should be routinely discussed with teachers. Focus walks, peer observations, demonstration lessons, outside consultant support, and any other professional learning should all support the priorities of the plans.

2. During leadership team meetings, determine progress with implementation of the strategies to address the target areas.
   - What are implementation strengths?
   - What actions were taken?
   - What is the impact on student learning?

3. During leadership team meetings, identify barriers to the implementation of the target areas.
   - What is an implementation concern/issue?
   - Why is it an issue?
   - What are the barriers?
   - What actions will we take?
   - How will we monitor?

4. At the end of each short-term action plan cycle, determine the quality of implementation of strategies. Include artifacts and evidences in the progress check and record implementation status.

The GaDOE will facilitate services from GaDOE specialists and other education agencies to support the targeted areas of need for Focus schools. The targeted services will address research-based strategies and practices for supporting English learners, students with disabilities, and economically disadvantaged students. Specific areas of support will be provided around the following areas that have been identified as key characteristics of schools that are closing the achievement gap.

1. Leadership
2. Effective teaching
3. Data-driven instruction
4. Extended learning time
5. A culture of high expectations
6. Job embedded professional learning

At the end of each year, the GaDOE will carefully review summative data and all indicators from the CCRPI to assess progress of Focus schools. In collaboration with school districts, adjustments will be made based on data to the non-negotiable actions and interventions for each individual Focus school.

The table below identifies the actions and timeline for implementation of a transition plan that ensures that the proposed differentiated recognition, accountability and support system will be fully implemented in the 2013-2014 school year.

Projected Timeline for Implementation	
Date	**Action**
November 2011	Finalize the College and Career Ready Performance Index
Jan-June 2012	Outreach and communication of the CCRPI to all stakeholders. Ongoing professional learning for School Improvement Specialists.
August/September 2012	Preliminary identification of Priority Schools and Focus Schools

September 2012	Initial release of CCRPI reports for all schools in Georgia. Continue to implement school and LEA support identified on 2011 AYP data during the 2012-2013 school year. School Improvement will shift the focus in working with schools from the traditional AYP data analysis to a focus on the data produced in the CCRPI Report. School improvement plans and initiatives will be driven by areas of need identified in the CCRPI with a focus on the subgroup data.
July 2013	Release and identification of Priority Schools and Focus Schools based on initial CCRPI calculations will inform differentiated recognition, accountability and supports for school improvement during 2013-2014 school year.

This timeline will provide a transition year that allows for Georgia's Accountability staff to dedicate their time to establishing an effective process for collecting and analyzing all components of the CCRPI in an accurate and timely manner. During that time, school improvement services and consequences will continue to be based on FY11 NI status. However, these services will be informed by various data from the CCRPI. The proposed Reward schools will be implemented during the 2012-2013 school year. The proposed CCRPI and differentiated recognition based on Priority and Focus groups will be fully implemented at the onset of the 2013-2014 school year.

2. E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits Focus status and a justification for the criteria selected.

The annual 'run' of achievement gap closure data will identify Focus Schools. Schools no longer falling into the lowest 10% will be exited; however, the Regional Education Service Agencies will continue providing support to these schools for two additional years.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, Priority, and Focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, Priority, or Focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS
See ATTACHMENT 9

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE 1 SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

The CCRPI will provide a broad picture of schools' achievement across subject areas, gaps within schools, gaps between school and state averages, progress, and subgroup performance flags as well as school climate and efficiency ratings that will provide a wealth of data for supports that can be used to address areas of need for all schools in Georgia, regardless of Reward, Priority or Focus status. A major strength of the structure of the proposed index is its continuous scaling, rather than a binary distinction for schools each year, which highlights the fact that all schools have room for improvement in certain areas. Thus, in addition to systematic support and interventions provided to schools identified in the Priority and Focus groups, Georgia's School Keys, Implementation Resource, and Georgia Assessment of Performance on School Standards (GAPSS) Analysis resources illustrate the GaDOE's commitment to the continuous improvement of all schools across the state. The GaDOE believes that all schools should strive for excellence and target areas for improvement that will contribute to growth and success for all students; to this end, the proposed plan includes a research-based intervention designed to identify and define eight core components of successful schools, assessing school performance across these components, and providing specific guidance for implementing strategies to promote these standards within a school. These resources are universally available to all schools in the state, and will be enhanced by the CCRPI.

The School Keys serve as a tool for all schools in the state. This document was field-tested during the 2004-2005 school year, and revised for the 2005-2006 school year using baseline data. An external validation study of the School Keys was conducted by the Georgia Partnership for Excellence in Education. This external validation included responses from and critiques by a national panel of experts in school improvement. Based on input from the external validation, further refinements were made to the School Keys, including clarification of language and the development of linguistic rubrics to guide the standards application process. The final core strands identified in School Keys are listed in the table below.

Georgia School Keys – Core Component Strands Identified for Promoting Success in All Schools	
Strand	**Descriptor**
Curriculum	System for managing and facilitating student achievement and learning based upon consensus-driven content and performance standards.
Assessment	Collecting and analyzing student performance data to identify patterns of achievement and underachievement in order to design and implement appropriate instructional interventions.
Instruction	Designing and implementing teaching-learning-assessment tasks and activities to ensure that all students achieve proficiency relative to Georgia Performance Standards (GPS).
Planning and Organization	The processes, procedures, structures, and products that focus the operations of a school on ensuring the attainment of standards and high levels of learning for all students.
Student, Family, & Community Engagement	The school as a community of learning involves parents and community members as active participants. There is consistent and growing evidence of parental involvement and volunteerism, participation in workshops and enrichment activities, and a process of two-way communication. Everyone collaborates to help the school achieve its continuous improvement targets and short and long range goals.
Professional Learning	Means by which teachers, administrators and other school and system employees acquire, enhance and refine the knowledge, skills, and commitment necessary to create and support high levels of learning for all students.
Leadership	The governance process through which individuals and groups influence the behavior of other so that they work collaboratively to achieve common goals and promote organizational effectiveness.
School Culture	The norms, values, standards and practices associated with the school as a learning community committed to ensuring student achievement and organizational productivity.

*These resources are made available to all schools in Georgia. (Appendix L, Resources)

These standards for school performance will continue to guide the work of school improvement throughout Georgia. All schools were provided with hard copies of the School Keys and corresponding GAPSS analysis and Implementation Resource manuals. Additionally, district level training is provided and these resources are available through the GaDOE website. More intense support on the use and implementation of these resources will be provided to Priority and Focus schools through collaboration with school improvement staff.

The GaDOE employs school improvement specialists who provide on-site support to identified systems and schools aligned to the standards for school performance. The support provided by the school improvement specialists will be informed by school level data from the CCRPI related

to student achievement, graduation rate, progress over time, and student achievement gaps. This level of staff support ensures that schools and districts will receive tailored training and support to promote standards while also building capacity to continue to promote these standards. School improvement specialists will pay particular attention to a school's performance flag indicators on the CCRPI when formulating school improvement plans. This data will serve as an important diagnostic tool in focusing and adapting interventions and supports to subgroups within a school. It will also subsequently provide a meaningful measure of intervention impact across subgroups. While a Red Flag will indicate problem areas for a particular subgroup, a Yellow Flag will highlight that although that subgroup did not meet the performance target, disaggregated data has demonstrated a rate of growth putting that student group on a trajectory toward meeting performance targets. These distinctions will provide school improvement specialists with invaluable information to support decisions about interventions in schools.

School improvement specialists will facilitate the analysis of data, determination of root causes, development of goals, identification of actions, strategies, and interventions, planning for professional learning, and the establishment of monitoring processes. This process will target specific school level data from the CCRPI including, but not limited to, the achievement of English learners and students with disabilities. The GaDOE support will target the individual needs of the Priority school or Focus school.

A structure and process for monitoring will be implemented at each school to ensure progress toward intended goals. Lead school improvement specialists will monitor system and school level implementation of actions, strategies, and interventions on a regularly scheduled basis ensuring alignment to identified areas of need in the school.

The GaDOE will also facilitate collaboration with other educational agencies such as Regional Education Service Agencies (RESA), colleges and universities, and regional labs to provide a statewide system of support for all schools.

- School and district staff will benefit from the range of school performance data included in the CCRPI. This information will be useful when making spending decisions for districts' Title I allotments that will aim resources at demonstrated areas of need.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

2. G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in Priority and Focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their Priority schools; and

iii. ensuring sufficient support for implementation of interventions in Priority schools, Focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

The proposed CCRPI accountability plan will measure school performance each year across multiple dimensions in a way that better equips GaDOE to monitor both improvement and lack of improvement by schools. This plan will also increase the SEAs capacity to identify and address underlying issues that impact student achievement, including achievement of subgroups. Further, the continuous scaling of Georgia's CCRPI will promote a culture of ongoing improvement for all schools. The GaDOE will capitalize on the rich dta the CCRPI provides as it works with LEAs to follow through on their commitments to school improvement initiatives with fidelity.

The best practices included in the Georgia school standards have proven to be successful in working with needs improvement schools in Georgia under ESEA. These school standards, along with the proposed CCRPI, will continue to serve as the foundation for Georgia's system of differentiated recognition, accountability, and support. Corrective actions and on-site support targeted at promoting school standards will be differentiated based on CCRPI results and determinations as well as specific system and school needs. Schools in Priority and Focus status will receive support and collaboration from area school improvement specialists and from GaDOE to address low achieving schools and gaps in student achievement. In addition to local school support, the GaDOE will service districts through a structure based on best practices and past success in school improvement work in the state.

The increased flexibility offered to LEAs through this waiver would allow districts to consider school level data as well as input from local school boards, principals, parents and other stakeholders to develop a flexible learning program that best meets the needs of their students. GaDOE staff will provide technical assistance to LEAs implementing these programs and continue to both monitor program implementation and evaluate performance in an effort to promote best practices and continued program improvement. Under the proposed plan, these learning programs would provide additional learning opportunities to students in Priority and Focus schools while improving overall student achievement and building capacity in these schools. Support for these programs will be ensured through set-aside requirements equal to 5% of schools' Title I allotments. Further, the structure of the proposed Reward schools system will provide the opportunity for schools to receive reward distinctions while in Focus or Priority status, creating incentives for effective school improvement while also providing additional resources for schools to reinvest in and grow effective interventions for their students.

Title I area specialists and GaDOE federal program specialists are available for consultation and provide monitoring and support for federal school improvement requirements. The GaDOE

also holds a Title I conference annually to offer professional learning and specific guidance to federal programs staff across the state before each school year. Priority and Focus schools may also have the support of a school improvement specialist hired by the GaDOE. The school improvement specialist will work directly with the school improvement process and initiatives targeted for areas of need. Each district will have the support of a lead school improvement specialist. The role of the lead school improvement specialist will be to monitor the implementation of the school improvement plan and short term action plans developed at the school. The lead school improvement specialist will work with the district to develop and implement district policies and procedures, and practices that support continuous school improvement in all schools, with special attention being provided to Priority and Focus schools within the district. Schools in Priority status will also be required to set aside 10% of their Title I allotments for professional learning, holding districts accountable to investing in teacher and leader quality to build capacity for sustained growth in Georgia's lowest achieving schools. As schools exit Priority and Focus status, they will continue to receive coordinated support from regional educational agencies for a minimum of two additional years. This transitional system for schools making positive gains in achievement and gap closure ensures that crucial support is provided to promote capacity for continued success.

Finally, in an effort to develop an innovative LEA accountability measure, districts will have the expanded CCRPI scores and wealth of disaggregated data for all their schools readily available for review. This review will allow districts to identify systemic needs and design plans to address those needs as well as offer specific, targeted support to schools with unique needs. The GaDOE will offer advisory support to districts as requested. Moving to the CCRPI calculations for determining accountability will allow districts to take responsibility for addressing the needs of all subgroups. The Financial Efficiency Rating will apply to districts, as well as schools. Districts will be able to clearly see problems and better identify appropriate solutions.

Indiana

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

"To evaluate schools, it has to be wedded to a simple, clear measurement – A, B, C, D, F."
– Indiana Governor Mitch Daniels

Description of A-F

Indiana's new state accountability framework uses traditional A to F letter grades to give parents, educators, and students an easy-to-understand system for understanding student performance. At the same time, letter grades provide a heightened awareness of school performance in local communities throughout the state.

Prior to the 2010-11 school year, Indiana's framework used an inscrutable labeling system illustrated in the table below:

Current Labels	Old Labels (Prior to 2010-11)
A	Exemplary Progress
B	Commendable Progress
C	Academic Progress
D	Academic Watch
F	Academic Probation

When the IDOE initially introduced letter grades, many schools and school districts that previously gave no pause to being labeled under the old system became vehemently vocal about the new one. As an example, a school could have been in "Academic Progress" for years without protestation, yet once that same school was labeled a "C," the outcry was fervent and immediate. A stunning ripple effect has occurred in local communities throughout the state as parents and civic groups have begun coalescing around and taking a greater interest in the quality of their schools. The amplified attention to school and student performance would have never happened without the shift to letter grades. The impact has been profound, prompting all stakeholders to ask difficult questions about increasing academic achievement and raising instructional quality within Indiana's schools.

Beginning with the 2011-12 school year, the A-F grading system will utilize an enhanced methodology that offers a more comprehensive analysis of school performance. This new analysis lends itself to a more meaningful accountability system that is better designed to differentiate, recognize, and support schools across the state. The new methodology reflects several core principles:

- All students can and should learn *at least* a year's worth of knowledge in a year's time.
- Student growth is a better measure of effectiveness than is absolute performance. Growth is also the best way to provide for the differentiated recognition of teachers and schools.
- Student achievement and school performance, including the closing of achievement gaps, are strongly correlated to effective teaching and leadership.
- Effective teaching makes a difference in how much a student learns, and how much a student learns is a measure of effective teaching.
- A heavy emphasis on accountability is necessary to create a system that supports the increase in the quality of instruction for students.

Indiana's A-F system is comprised of an elementary/middle schools model and a high schools model. Both models look at the performance and progress of students over time for all students and all subgroups. A key component of the model is a newer and more efficient way to track the proficiency and progress of traditionally underperforming subgroups and other low performing students by creating a super subgroup that analyzes the bottom 25 percent of students throughout the state. Focusing on this super subgroup coupled with utilizing Indiana's revolutionary Growth Model is far more effective at shining a light on exactly where the achievement gaps are occurring and for whom than was the case for subgroups as traditionally contemplated. Indiana believes this bold approach to subgroup identification (i.e. *all* schools have a bottom 25 percent) promises to directly attack the intractable issue of achievement gaps in a way many states would be more hesitant to utilize.

Moreover, Indiana's demographic outlay is such that hundreds of schools have significant traditionally underperforming student populations but too often those same schools have multiple subgroups that do not meet the 30 student count threshold to allow for accountability (e.g. 25 Hispanic students, 28 Black students, 18 Special Education students). As a result, too many underperforming students are slipping through the cracks and falling off the accountability grid. This oversight by the traditional, static definition of subgroups is simply unacceptable.

Indiana's new and dynamic super subgroup enables the state to ensure those missing students are now calculated in each school's accountability because every school has a bottom 25 percent. Data show that traditionally underperforming students in Indiana comprise a

significant amount of that bottom 25 percent population. Indiana schools must improve the proficiency levels and demonstrate significant growth for the new super subgroup in order to receive an acceptable mark on the state's new A-F grading scale. Notably, IDOE has run data, shown later in this section, that illustrate the strong potential for a dramatic narrowing of Indiana's achievement gaps as a result of this focus on the bottom 25 percent.

More information about A-F is included as Attachment 13 and 14

Description of the Indiana Growth Model

Notably, the Elementary and Middle School model is built on the trailblazing Indiana Growth Model, which Dr. Bennett has described as the "game-changer" with regard to school accountability. Indiana has been at the nation's forefront in ensuring that student progress, or growth, over time provides the foundation for recognizing and supporting student and school performance.

Based on the innovative work initiated in Colorado and developed in partnership with the National Center for the Improvement of Educational Assessment (NCIEA), the Indiana Growth Model is a statistical model used to calculate student progress, or growth, on state assessments. The Indiana Growth Model fundamentally re-conceptualizes the state's accountability system in two key ways:

1. Growth shines a spotlight on the closing of achievement gaps
2. Growth promotes a focus on all students and not just the "bubble kids"

Moreover, the Indiana Growth Model allows for an unprecedented level of public disclosure of information about individual student, school, and district performance. IDOE is committed to focusing educational reform and school improvement efforts around the Growth Model to raise student achievement for every student and close achievement gaps.

The Growth Model also enables parents, teachers and administrators to understand how individual students are progressing from year to year. This capability is not insignificant, as prior to the implementation of the Growth Model, classroom teachers were the only ones who knew anything about a student's progress. Now, for the first time, student progress is being made transparent to a broader array of education stakeholders in an easy and readily accessible format. Based on where each individual student begins, IDOE expects all students to achieve at least one grade level of growth in an academic year.

More information about the Indiana Growth Model is included as Attachment 15.

Implementation Plan

Indiana is on track to implement its accountability plan way ahead of the 2012-13 school year. In fact, the A-F category labels were implemented with the 2010-11 school year and will be updated with the following metrics for 2011-12:

Elementary and Middle Schools

- Student achievement (English/Language Arts and Mathematics)
- Student growth
  - The growth of students in the bottom 25 percent
  - The growth of the remaining 75 percent of students

High Schools

- Student performance and improvement on End-of-Course Assessments
  - English 10
  - Algebra I
- Graduation rate
  - Four-year
  - Five-year
- College and career readiness
  - Advanced Placement (AP) exams
  - International Baccalaureate (IB) exams
  - Dual/Concurrent Enrollment college credits
  - Industry Certifications

The targets, or cut scores, for each of these metrics is aligned with Dr. Bennett's broader "90-25-90" goals, established shortly after he took office in 2009:

- 90 percent of students pass the Mathematics and English/Language Arts portion of the state's annual assessments (*ISTEP+*)
- 25 percent of graduates pass an AP or IB exam or earn college credit during high school
- 90 percent of students graduate with a meaningful diploma

As described earlier in this plan, the development of Indiana's A-F accountability model was an eighteen-month process that incorporated input from numerous educational stakeholders. The state's rule-making process for A-F was initiated by the State Board of Education on November

7, 2011. The final rule is expected to be published in spring 2012, which provides sufficient time for 2011-12 implementation.

The bottom 25 percent: the new "Super Subgroup"

Indiana's accountability system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students. Based on research conducted by IDOE, Indiana is confident that this bold new system recognizes top performers, targets support to those who struggle, and provides a renewed focus on addressing achievement gaps.

The accountability system's attention to the bottom 25 percent reflects the state's commitment to bridging the gap between the highest and lowest performers. Addressing these stubborn achievement gaps is a precondition to significantly raising student achievement and school performance across the state. IDOE has been able to identify the traits of students that makeup the bottom 25 percent of student achievement on the state's annual assessment (*ISTEP+*) as defined by scale score at each grade level. IDOE has examined a combination of one-year and three-year results of both the lowest performers in English/Language Arts (ELA) and mathematics to be sure our system directly attacks this problem.

Key characteristics of the bottom 25 percent include the following:

- 40 percent minority
- 70 percent receive free or reduced priced meals
- 28 percent receive Special Education services
- 10 percent are Limited English Proficient (LEP)

It is important to remember that *every* school in the state of Indiana has a bottom 25 percent.

The bottom 25 percent students historically pass the state assessment at a rate fifty percent lower than the top seventy-five percent population. Students in the traditional subgroups that are not included in the bottom 25 percent population have a cumulative proficiency rate of ninety percent. These data reaffirm Indiana's assertion that subgroups should be targeted based on performance rather than just demographics. The relentless focus on performance reflects how serious Indiana is about not just closing achievement gaps but eliminating them outright.

More information about the bottom 25 percent is included as Attachment 16.

Merging State (P.L. 221) and Federal (AYP) Accountability Systems

Since Dr. Bennett took office in 2009, student performance on the statewide assessment has steadily risen each year. At the same time, state and national expectations continue to rise for our schools and students. Within the context of heightened accountability, Indiana has shifted to an A-F system as part of an ongoing effort to align the state's accountability measures with

twenty-first century demands and to ensure all Indiana students graduate from high school well-prepared for college or career.

Public Law 221 (P.L. 221) is Indiana's comprehensive accountability system for K-12 education. Passed by the Indiana General Assembly in 1999 – prior to the federal No Child Left Behind Act of 2001 – the law aimed to establish major educational reform and accountability statewide. To measure progress, P.L. 221 places Indiana schools (both public and accredited non-public) into one of five categories (A, B, C, D or F) based upon student performance and growth data from the state's *ISTEP+* and End-of-Course Assessments (ECAs).

Schools in the lowest P.L. 221 category (F) face a series of interventions designed to provide the additional support needed to improve student achievement. A chart describing these interventions is located in 2.D.iii. (page 60). These interventions become more serious the longer schools remain in the bottom category.

One of the key obstacles to student achievement and school performance in our state has been the confusion between P.L. 221 and AYP (i.e. state versus federal accountability). While there is some overlap, the two systems are unique enough that it has become customary for the State Superintendent to make "two announcements" each year with regard to school performance – one about how schools fared under P.L. 221 and a separate announcement about AYP status.

Indiana is seeking approval of the state's new accountability system – transparent letter grades coupled with an aggressive timeline for state support and intervention – to fulfill federal accountability requirements. This flexibility would allow Indiana to make one annual announcement about school performance, thereby providing clearer information to schools and educational stakeholders while eliminating any conflicting messages about state or federal expectations for schools and educators.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☒ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☐ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all

	grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

Insert text for Option B here.

2.B Set Ambitious but Achievable Annual Measurable Objectives

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year

		in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

Explanation for Option C

Indiana elected option 'C' to create "ambitious but achievable AMOs for all LEAs, schools, and subgroups." Indiana's proposed AMO would greatly increase proficiency rates across the state while holding more schools accountable for more students in traditional subgroup populations than option 'A' or 'B' would have allowed.

By selecting option 'C,' Indiana will have a proficiency rate that is ten percent higher than under option 'B,' while also greatly increasing the state's graduation and college and career readiness rates, which would have otherwise been unaffected by the AMO under the alternative options. Indiana's AMO will also lead to more accountability for traditional subgroups while concentrating efforts on all historically underperforming students – and not simply by the limited targeting of students based solely on race, gender, socio-economic, special education, or LEP status as prescribed under options 'A' and 'B.'

By focusing on one super-subgroup, the bottom 25 percent, Indiana will see a greater impact (twenty percent increase in proficiency rates and twenty percent decline in the achievement gap), touch more students (see table below), and target additional resources to the students that need them the most. Indiana's proposed AMO is the only option that specifically addresses the lowest achieving students and promotes high student growth and proficiency improvement from this population. As a result, Indiana's AMO will have a greater impact than any of the alternatives.

Percentage of schools that will have students from each student population included in subgroup calculations		
Traditional Subgroup	Under Option 'A' and 'B'	Under Indiana's AMO
American Indian	0%	16%
Black	23%	62%
Asian	3%	31%
Hispanic	22%	71%
White	91%	97%
Free or Reduced Priced Meals	90%	99%
Limited English Proficient	19%	59%
Special Education	57%	99%

As an example, in 2011, fifty-seven percent of all schools were assessed in AYP in the special education subgroup. Under Indiana's proposed AMO, ninety-nine percent of all schools in 2011 would have had special education students captured in the bottom 25 percent super-subgroup. This translates into an additional forty-two percent of schools that would have been held accountable for their special education students. Indiana's proposed AMO represents a far more aggressive approach to identifying and eliminating achievement gaps for all subgroups.

AMO Methodology

Indiana's accountability model encompasses not only state assessment proficiency levels but also a number of other school and district level indicators to ascertain a clear and comprehensive view of performance. As a result, Indiana has outlined the following AMO that defines a proficient school:

> **All Indiana schools, and all subgroups within the school, must receive an 'A' or improve by two letter grades by 2020.** This is an ambitious and achievable goal that reflects the state's commitment to ensuring more students are on track for college and careers.
>
> Schools assigned a grade other than an 'A' for the 2011-12 school year must do the following:
>
> - Receive a school grade of an 'A' or improve at least one letter grade over the next three ensuing years; AND
> - Improve by two letter grades by 2020; AND
> - Receive a grade no worse than a 'C' in any subgroup or show substantial high growth within that subgroup.
>
> - "Substantial high growth" is defined as being in the top twenty-five percent of all schools statewide in the percentage of students within that subgroup that showed more than one grade level worth of growth during the most recent school year.
>
> Timeline
>
> - 2012 – A new baseline grade will be established for each school based on the grade received for the 2011-12 school year.
> - 2015 – Each school is expected to receive an 'A' or improve by one letter grade from the 2012 baseline grade.
> - 2020 – Each school is expected to receive an 'A' or improve by two letter grades from the 2012 baseline grade; AND all subgroups must receive a 'C' or show

substantial high growth within that subgroup.

The table below illustrates the expected distribution of schools across the state based on the proposed methodology.

Expected School Grades based on AMO			
	2012	2015	2020
A	28%	58%	73%
B	19%	16%	16%
C	26%	16%	11%
D	16%	5%	0%
F	12%	5%	0%

Notably, Indiana has set a goal of significantly reducing the number of 'D' and 'F' schools. If the AMO is met by 2020, Indiana could expect a twenty percent decline in the achievement gap. Additionally, Indiana would expect to have at least ninety percent of all students passing the state assessment – consistent with the "90-25-90" goals Dr. Bennett has established.

Although Indiana has realized steady improvement on *ISTEP+* scores since 2009, the passage rate is currently at seventy-one percent. Through the proposed AMO, that rate will increase by twenty percent by 2020. Indiana is switching the focus from static subgroup performance and the accompanying limitations to the performance of each school's bottom 25 percent in proficiency. This shift allows schools to deliberately move from a diffused attention of up to eight subgroups to a concentrated focus on one – the lowest performing – and to more strategically align their resources to the students that need the most help. Indiana believes this shift is essential to unleash the potential of schools and school districts to close the gap between the highest and lowest performers. Indiana's bold and aggressive approach provided incentive for schools not only to increase their proficiency levels but also to reward individual student growth. Indiana's AMO and state accountability model encourages schools to continue to grow each student in the school regardless of proficiency level by rewarding schools for getting high achievers to achieve even higher, low achievers to grow more quickly, and all students to grow at or above grade level. This differentiated strategy allows Indiana students and schools to increase proficiency, graduation, and college and career readiness rates at a faster pace than in previous years. Moreover, Indiana believes this formula could serve as a national model for increasing student performance and tackling the persistent gaps in student achievement.

At the high school level, if current trends hold true for 'A,' 'B,' and 'C' schools, in 2020 Indiana could expect the following:

- A statewide graduation rate of over ninety percent
- A third of all graduates to receive an honors diploma
- Forty percent of all graduates to receive postsecondary credit prior to graduation

(through AP, IB, and dual credit courses)

- A fifty percent decline in the high school dropout rate, for an estimated 2020 dropout rate of only three percent

The table below projects Indiana's improvement trend along several key indicators:

	Current	2015	2020
% Pass *ISTEP+*	71%	83%	90%
Graduation Rate	84%	88%	91%
% Receiving Honors Diplomas	29%	30%	32%
% Earned College Credit	29%	33%	40%
Dropout Rate	6%	5%	3%

The following table illustrates the number of Academic Honors Diplomas that could be expected during benchmark years:

Students Earning Academic Honors Diplomas			
	# of Graduates	% of Graduates	Increase
2010	19,452	29%	---
2015	20,840	30%	1,388
2020	22,987	32%	3,535

i. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below.

Indiana's proposed AMO is based on the state's robust accountability system. It provides an accurate pattern of LEAs' and schools' academic progress by focusing not only on student proficiency but also on individual student growth (i.e. Indiana's Growth Model) and improvement (i.e. improvement in an LEA's or school's percent of students passing state tests from one year to the next), graduation rates, and college and career readiness indicators. Using multiple student performance variables, Indiana provides more robust accountability measures through a combination of key benchmarks and annual goals.

Key Benchmarks

Indiana's plan sets both a three-year benchmark and an eight-year benchmark within its AMO. These benchmarks are illustrated in the example below. In order for a school or LEA to meet Indiana's AMO, a school would have to demonstrate consistent improvement across *all* state measures. This innovative design parallels the state's A-F accountability system and reflects Indiana's belief that in order for accountability to be rigorous, student performance cannot be limited to solely one measure.

Example: Hoosier High School received a 'D' in 2011-12 under Indiana's state accountability system. That 'D' grade translated into a 60 percent passage rate on the

state assessments (ISTEP+), 5 percent of graduates being college & career ready (CCR), and a 60 percent graduation rate. Per Indiana's AMO, the school is required to improve by two letter grades or receive an "A" by 2020. In order to reach this target, Hoosier High School would need to demonstrate annual improvement as shown below.

School Year	Benchmark	Benchmark Goal	Annual State Assessment (ISTEP+) Proficiency Goal*	ISTEP+ %	Annual College & Career Readiness (CCR) Rate Goal*	CCR %	Annual Graduation Rate Goal*	Grad Rate %
2011-12	Baseline			60.0		5.0		60.0
2012-13			Increase by 3.3 percentage points	63.3	Increase by 2.3 percentage points	7.3	Increase by 3.3 percentage points	63.3
2013-14			Increase by 3.3 percentage points	66.6	Increase by 2.3 percentage points	9.6	Increase by 3.3 percentage points	66.6
2014-15	Three-Year Benchmark	Achieve an 'A' or improve by one letter grade from the 2012 baseline	Increase by 3.4 percentage points	70.0	Increase by 2.3 percentage points	11.9	Increase by 3.4 percentage points	70.0
2015-16			Increase by 4.0 percentage points	74.0	Increase by 2.6 percentage points	14.5	Increase by 4.0 percentage points	74.0
2016-17			Increase by 4.0 percentage points	78.0	Increase by 2.6 percentage points	17.1	Increase by 4.0 percentage points	78.0
2017-18			Increase by 4.0 percentage points	82.0	Increase by 2.6 percentage points	19.7	Increase by 4.0 percentage points	82.0
2018-19			Increase by 4.0 percentage points	86.0	Increase by 2.6 percentage points	22.3	Increase by 4.0 percentage points	86.0
2019-20	Eight-Year Benchmark	**Achieve an 'A' or improve by two letter grades from the 2012 baseline**	Increase by 4.0 percentage points	**90.0**	Increase by 2.7 percentage points	**25.0**	Increase by 4.0 percentage points	**90.0**

**This example is for illustrative purposes only. The annual goal will vary depending on what letter grade the school receives in its baseline year and the grade levels served by the school. A school can increase its grade from the 2012 baseline using any combination of increased proficiency and high student growth/improvement over a sustained period of time. The power of Indiana's AMO is that it differentiates and is individualized to each LEA and school.*

If Hoosier High School achieved the annual proficiency rate increases in the table above, it would receive an "A" in 2020. This grade translates to a 90 percent passage rate on the state assessments, 25 percent of graduates being college or career ready, and a 90 percent graduation rate – consistent with Dr. Bennett's "90-25-90" goals.

The three-year benchmark calls for each LEA and school to either receive an 'A' rating or to improve by one letter grade from its 2012 baseline rating. Each LEA and school will be allowed three years to show improvement due to the rigorous progress that is necessary to increase a school's or LEA's grade. To improve one letter grade, a school must increase its proficiency level by ten percentage points, show substantially high growth among its student subgroups, or a combination of the two. This approach is unique in that it requires schools and LEAs to focus on each individual student within the school while placing a special emphasis on the bottom 25 percent population. Without substantial improvement and growth among the bottom 25 percent, a group of students that has historically faced more educational challenges with a proficiency rate of only forty percent, it would be impossible for all but a few schools to show the necessary progress within three years. Allowing only three years to reverse a decades-long trend of stagnant low performance within the bottom 25 percent population, while simultaneously improving all other student proficiency levels, is not only daring but also achievable through the measures and focus Indiana's AMO lays out.

The eight-year benchmark calls for each LEA and school to either receive an 'A' rating or to improve by two letter grades from its 2012 baseline rating. Each LEA and school will be allowed eight years to show the necessary improvement due to the rigorous process required. Specifically, a two letter grade improvement translates into a twenty percentage point increase in proficiency. For LEAs and schools, this figure would also represent an unprecedented reduction in the percentage of students showing low growth and improvement. The eight-year benchmark also requires that no subgroup receive below a 'C' rating or the LEA and school must show substantial high growth in each subgroup. To accomplish both of these feats, students at each school and LEA must consistently show substantial improvement and growth over a sustained period of time, with the majority of that improvement and growth coming from the bottom 25 percent subgroup. Realizing the eight-year benchmark would result in a 75 percent increase (from 40 percent proficient to 70 percent proficient) in the proficiency level of these students.

Both Indiana's three-year and eight-year benchmarks are extremely ambitious given historic statewide proficiency trends. But by building in a laser-like focus on each school's lowest achievers, the new AMO and accountability system incent a strategic allocation of resources at the local level. Students will no longer slip through the accountability cracks of the traditional

subgroup structure. Instead, every school across the state will, for the first time, be held accountable for the performance of all struggling students. This strengthening and streamlining of school and district accountability will allow Indiana to race ahead of other states, put an end to a decades-long trend of poor performance among its bottom 25 percent subgroup, and bridge the gap between the state's highest and lowest performers.

Annual Goals

Even though Indiana's AMO provides three-year and eight-year benchmarks, all schools and LEAs will still be assessed annually for progress and performance under Indiana's state accountability system. For a chart that outlines annual goals under this system, see page 64. Schools will be categorized as Focus, Priority, and Reward schools on a yearly basis as well. As outlined previously in this plan, Indiana has developed a rigorous state accountability system that holds schools and LEAs accountable for low growth and for poor proficiency, graduation, and/or college and career readiness rates.

Indiana's Proposed AMO within the Context of "Putting Students First"

Indiana is one of the country's leaders in providing a diverse environment of quality educational options. As part of "Putting Students First," Indiana established the most expansive school choice system in the nation's history. For the first time, all Indiana schools – traditional public, public charter, and private or parochial – are competing for the same students and the accompanying funding. As a result, there are new pressures on the system writ large to ensure every school and LEA continues to improve both their student proficiency levels across all subgroups and their overall grade.

The Indiana State Board of Education will have the ability to increase the required proficiency levels necessary to achieve each grade. IDOE is also in the process of developing an "automatic trigger" to ensure that the proficiency bar remains rigorous for all schools. Additionally, the growth and improvement targets will be re-evaluated at least every three years. In other words, schools will need to continue to improve just to maintain their current grade.

Considering Indiana's accountability system within the new landscape of school choice and competition and the categorization of Title I schools, Indiana schools will be operating in a climate that promotes improvement at unprecedented levels. The pressures and incentives to increase student growth and achievement will increase while the additional layer of federal accountability standards will no longer act as a barrier to improvement.

To illustrate the potency of this new context, the following are possible scenarios for schools that fail to improve or receive an 'A':

- The school could be subject to state intervention, including but not limited to state takeover
- The school could lose state money as a result of students transferring to higher performing public and non-public schools.
- The school could have federal money withheld due to being classified as a Focus or Priority School

On the flip side, high performing schools will be celebrated in new and innovative ways, from preferred access to state grants that reward educator effectiveness to recognition ceremonies held in local communities throughout the state. Earlier this year, the Indiana General Assembly approved a two-year budget that includes $15 million in competitively allocated state funding to drive educator effectiveness. State legislators have expressed interest continuing to purpose state dollars for the improvement of human capital within schools; those that consistently deliver with regard to raising student performance may receive special consideration from IDOE in applying for these dollars. The expertise of high performers will also be leveraged by IDOE as the state acts to broker best practices in addressing achievement gaps and improving student outcomes.

For these reasons, Indiana schools and districts will be highly motivated to make annual progress and hit both the 2015 and 2020 benchmarks. Indiana's proposed AMO outlines a bold, new approach toward realizing significant student performance gains by 2020. Our plan requires low-performing LEAs and schools to improve at a rate nearly double the state average while also being realistic about each school's individual starting point or baseline.

LEAs and schools may also use a combination of proficiency level improvement and growth among their historically underperforming students to increase their grade. With Indiana's proposal, rigorous measures are coupled with strong supports to ensure each school and district continues to progress on a yearly basis. This combination ensures that Indiana's proposed AMO is both ambitious and achievable for every school in the state.

ii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010-2011 school year in reading/Language Arts and Mathematics for the "all students" group and all subgroups. (Attachment 8)

See Attachment 8 for a chart outlining average statewide proficiency for all subgroups in 2010-11.

Indiana's AMO would exceed the intention of both Options A and B.

Indiana's AMO would result in forty-one percent of all non-proficient students becoming proficient by 2015 and sixty-five percent of all non-proficient students becoming proficient by 2020. It will also require the bottom 25 percent subgroup to nearly double its proficiency rates while maintaining high growth among the subgroup population.

The AMO calls for each LEA and school to receive an 'A' under the state accountability system or make great progress to that end by 2020. This target would translate into a state proficiency level of ninety percent. Moreover, each subgroup below that threshold would have made substantial gains and/or shown substantially high growth during that period.

As outlined in 2.A.ii, Indiana's AMO is designed to be both ambitious and attainable. It is a bold

and considered approach that does not rely on static proficiency targets based on arbitrary percentages. Rather, Indiana's proposed system is pegged to letter grades – embedded within which is a simple yet sophisticated mechanism for examining school and student performance. The improvement levels laid out in the AMO require LEAs and schools to improve proficiency levels at an achievable rate, while also rewarding them for making substantially high growth among its subgroup populations.

By realizing Indiana's AMO, the state could expect 12,000 additional students to be college and career ready. Indiana defines a student as college or career ready if the student earns an academic honors diploma, passes an AP or IB exam, earns transcripted college credit, or earns an approved industry certification. Students who meet one or more of these indicators are significantly less likely to require remediation than their counterparts.

Indiana's AMO would result in twenty percent more graduates being college or career ready in 2020 – an unprecedented accomplishment.

2.C Reward Schools

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

Rationale

Within a new culture of accountability in the state, Indiana proposes a differentiated recognition and reward system that engages schools and school districts in taking ownership of their results and drives them toward ongoing improvement. This recognition system, described below, was developed in consultation with multiple stakeholders and reflects the state's commitment to setting and keeping the bar high. As such, this system will highlight and celebrate the schools to which communities across Indiana can look to find exemplars of excellence.

Highest Performing Schools

Any Title I school that receives an 'A' under the state accountability model for at least two consecutive years shall be classified as a *Highest Performing School*. The Highest Performing School designation reflects a firm belief in the importance of not only recognizing schools that make significant progress within a year but also celebrating the state's highest achievers who have performed at a remarkably high level over a sustained period of time.

Recognizing both achievement and growth will ensure that all schools, regardless of their overall performance, focus on the improvement of each individual student rather than simply those on the cusp of proficiency (i.e. the "bubble kids").

High-Progress Elementary & Middle Schools

Any Title I elementary or middle school that shows high growth in its bottom 25 percent student subgroup in both English/Language Arts and Mathematics shall be designated as a *High Progress Elementary/Middle School*.

The bottom 25 percent student population captures the lowest performing students within a school on the state assessment (*ISTEP+*). This super subgroup encompasses each school's lowest performers across all ethnic, socio-economic, special education, and LEP subgroups. By placing a special emphasis on the bottom 25 percent, High Progress Elementary/Middle Schools will close the achievement gap between top and bottom performers, leading to overall improvement in student proficiency levels.

The focus on the bottom 25 percent, consistent with Indiana's state accountability model, is essential to meet Indiana's proposed AMO by 2020.

High-Progress High Schools

Any Title I high school that shows significant high improvement within its not-proficient student population in both English/Language Arts and Mathematics shall be designated as a *High Progress High School*.

Consistent with current national trends, Indiana does not have yearly state assessments for students in grades 9-12. As a result, High Progress High Schools will be determined using the improvement made by previously not-proficient students. Any student that fails to pass the Algebra I (Mathematics) assessment or the English 10 (ELA) assessment by the completion of grade 10 is deemed to be non-proficient. Only schools that have the highest percentage (the top twenty-five percent improvement of all schools statewide) of these students passing both sections of the assessment prior to graduation will be categorized as High Progress High Schools.

Indiana will also recognize any Title I high school that makes a concerted effort to support those students who are not able to graduate within four years, but are able to graduate in five. This recognition does not lower expectations – the emphasis will remain on graduating within four years. However, schools must not give up on those who do not graduate on time and this recognition provides some incentive to keep pressing so that those students also receive a Core 40 diploma.

Indiana's Core 40 is the academic foundation all students need to succeed in college, apprenticeship programs, military training, and the workforce. More information about Core 40 is available at http://www.doe.in.gov/core40/diploma_requirements.html

At the high school level, Indiana is placing a heightened focus on non-proficient students because research shows that students who fail to pass these assessments by the end of grade 12 are far more likely to drop out of school, less likely to graduate, and – for those that do

graduate – significantly more likely to require remedial coursework if they continue on to a postsecondary institution. This focus is also consistent with Indiana's state accountability model and the state's goal to produce more high school graduates that are prepared for college and careers.

Indiana is also calling attention to fifth-year graduates as part of the High Progress High School designation, consistent with efforts to support those who do not graduate within a four-year window. This attention recognizes schools that take students who may otherwise be forgotten, endeavor to turn their performance around, and set them on course for a productive future.

The High Progress School recognition, for both elementary/middle and high schools, places a premium on supporting historically low performing students who would have otherwise been on track to drop out, not receive a high school diploma, and not been properly prepared for college or career. This recognition seeks to highlight the schools that are successful in proving what is possible with some of the most challenging student populations.

Statewide, nearly sixteen percent (152 schools) of Title I schools would be identified as reward schools. See Attachment 9, Table 2 for a list of Indiana's reward schools.

2.C.ii Provide the SEA's list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Reward schools will be recognized in a number of ways:

- All reward schools will receive bonus rubric points on their application for the Excellence in Performance Award for Teachers. This is a state-level competitive grant of $9M for FY12-13.
- IDOE will pursue greater funding flexibility for reward schools via the State Board of Education and the Indiana General Assembly.
- Best practices of reward schools will be highlighted and disseminated across the state.
- Dr. Bennett and IDOE staff will travel to the Highest Performing Schools to give their official 'A' plaque in a school-wide celebration.
- Reward schools will be exempt from certain regulations, such as complying with the administrative functions of Indiana's 3rd grade reading plan.
- High Progress Schools may be honored at the State Capitol by the Governor or State Superintendent.
- High Progress Schools may be asked to present at the State Board of Education meetings as part of the monthly "Spotlight on Learning" that highlights outstanding schools and educational initiatives.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

Any Title I school that receives an 'F' or is a persistently low-achieving school shall be classified as a *Priority School*. A persistently low-achieving school is defined as any school that receives a 'D' or an 'F' for two or more consecutive years.

Schools that meet this definition are among the lowest performing schools in the state and typically have extremely high rates of low growth (improvement) among all student subgroups. In fact, between schools categorized as *priority* and *focus schools*, the entire fifteen percent of schools with the lowest performance would be facing some level of state intervention under proposed definitions. These schools also encompass all Title I schools in the state that have a graduation rate of less than sixty-percent. In fact, these schools have an average graduation rate of less than fifty percent.

It is essential that these schools get back on track and increase their performance across all areas (state assessments, graduation, and college and career readiness rates). Notably, students in priority schools are sixty-three percent less like to pass a state assessment, fifty-five percent less likely to graduate, and six times more likely to drop out of school than are students in Indiana's 'A' schools.

Statewide, approximately sixteen percent (154 schools) of Title I schools would be identified as priority schools. See Attachment 9, Table 2 for a list of Indiana's priority schools.

2.D.ii Provide the SEA's list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

State Authority

Public Law 221 (P.L. 221) is Indiana's comprehensive accountability system for K-12 education. Passed by the Indiana General Assembly in 1999 – prior to the federal No Child Left Behind Act of 2001 – the law aimed to establish major educational reform and accountability statewide. To measure progress, P.L. 221 places Indiana schools (both public and accredited non-public) into one of five categories (A, B, C, D and F) based upon student performance and growth data from the state's *ISTEP+* and End-of-Course Assessments (ECAs).

Schools in the lowest P.L. 221 category (F) face a series of interventions designed to provide the additional support needed to improve student achievement. These consequences become

more serious the longer schools remain in the bottom category.

Public Law 221 Timeline for "F" Schools

Year 1	
State Action	The local school board can request that the State Board of Education appoint an outside team to manage the school or assist in the development of a new school improvement plan. If this happens, the state will consider the school to be in Year 4 under P.L. 221. (See section on Years 4 and 5.)
Local Action	Local school board notifies public and conducts hearing. School improvement committee revises improvement plan accordingly.
Years 2 and 3	
State Action	The local school board can request that the State Board of Education appoint an outside team to assist in the development of a new plan. If this happens, the state will consider the school to be in Year 4 under P.L. 221.
Local Action	School implements revised school improvement plan.
Years 4 and 5	
State Action	The State Board of Education appoints a technical assistance team (TAT) to provide schools and their supporters with specific, action-focused feedback on what is working well and clear targets for improvement in order to support the school in their efforts to improve the educational outcomes for all students. Based on public testimony, analysis of previous school evaluations and critiques of student- and school-level performance data, the IDOE will make an intervention recommendation for state intervention to the State Board of Education. The IDOE's intervention recommendation and subsequent State Board of Education action will be made with the understanding that the LEA has been afforded the appropriate time, autonomy and technical assistance to improve its priority school's quality. In short, while there is a menu of potential intervention options, those which do not constitute a school restart (e.g., modifications to the school's improvement plan) are not viable.
Local Action	School considers and implements recommendations of TAT. LEAs can petition the State Board of Education for authority to implement one or more of the "Year 6 Interventions" below in either year 4 or 5.
Year 6	
State Action	State Board of Education conducts a hearing to solicit testimony on options for the school, including merging the school with another school; assigning a special management team to operate all, or part of, the school; Department recommendations; other options expressed at hearing; and revising the improvement plan. If the State Board determines that intervention will improve the school, the school must implement at least one of the options listed above.
Local Action	Implement intervention(s) as determined by the State Board of Education.

In the fall of 2011, for the first time since P.L. 221 was signed into law, seven schools reached their sixth year of academic probation – the lowest performance category (now called "F"). At the August 29, 2011 State Board of Education (SBOE) meeting, the board approved IDOE's intervention recommendations and voted in favor of assigning a special management team to operate five of the seven schools and implementing a lead partner intervention at the remaining two schools.

Prior to the state's action, school reform opponents were highly skeptical and dubious of Dr. Bennett's and the State Board of Education's resolve to intervene. In fact, some publicly questioned what they perceived as a "game of chicken" and one school administrator even remarked, "The State of Indiana will never take over a school. It never has and it never will." To the surprise of these detractors, the SBOE has proven its willingness to exercise the full scope of its authority and act with the sense of urgency needed to quickly and dramatically improve the educational quality in these schools.

As a result of Dr. Bennett's leadership and the SBOE's courage and conviction, a new dawn of school accountability has finally begun in Indiana. Prior to August 29, there was no precedent for this level of state action. Not surprisingly, a clear message has been sent that the state will not stand idly by when schools continue to fail and students are permitted to languish. Perhaps more importantly, the landscape has permanently shifted to one where accountability is real.

Process

The state's process and strategy for intervening in the lowest performing schools is predicated upon the development of clear goals and measurable success indicators through the lens of a seminal framework developed by Mass Insight and outlined in *The Turnaround Challenge*, which U.S. Education Secretary Arne Duncan has called "the Bible of school turnaround." Indiana is currently one of a few select states participating in Mass Insight's School Development Network as part of a concerted effort to trailblaze cutting-edge, best-in-class turnaround policies.

The special management team assigned by the SBOE is also referred to as a Turnaround School Operator (TSO). TSOs run operations for all or part of a school, using the school's per-pupil funding allocation. The TSO intervention is the most severe of the options available under state statute. It is reserved exclusively for the chronically lowest performing schools. In schools not assigned TSOs, Lead Partners (LPs) work strategically with the leadership appointed through the school district to support and implement targeted improvements. Each TSO has entered into an initial one-year contract with the state, and the SBOE has established aggressive benchmarks that TSOs and LPs must hit to maintain their good standing.

TSOs will spend the rest of the 2011-12 academic year evaluating and preparing to assume full operational control in the 2012-13 school year. Consistent with Mass Insight's groundbreaking research, benchmarks for this transitional year include a strong focus on community and parent

outreach as well as a thorough evaluation of school programs, staff and curriculum. The data collected by TSOs will lay the groundwork for a fast start when they take the wheel from the local school district next year.

LPs will also engage key stakeholder groups to establish buy-in to the support services provided. They will be held responsible for integrating their work with existing school initiatives and ensuring that the school is on track to dramatically improve. LPs will spend a few months embedding themselves into the school and assessing its needs before initiating services this year.

The TSOs and LPs are under the direct oversight of IDOE and are directly accountable to the State Board of Education. IDOE's Office of School Improvement and Turnaround will conduct constant and ongoing oversight of the TSOs and LPs through weekly meetings, attendance at key events and functions (e.g. community forums), and review of all deliverables, which are subject to IDOE approval. IDOE's engagement with TSOs and LPs will be "high touch," as this is one of Dr. Bennett's key education priorities.

School Turnaround and Community Involvement

Limited or non-existent community engagement is one of the most frequently cited reasons for the failure of school turnaround. Consequently, IDOE intentionally built-in a transitional year that prioritizes community engagement (e.g. focus groups, community forums, partnerships) in each of the four phases of work required of TSOs during the initial year. This transition affords TSOs critical time to develop a bold and aggressive school transformation plan while building meaningful community will and coalitions that can later be leveraged to sustain ongoing improvement. LPs will also be responsible for engaging their respective communities to generate support for its school turnaround efforts.

More information about the state's turnaround process is included as Attachment 17 and available at http://www.doe.in.gov/turnaround/.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

Current and accelerated timeline

P.L. 221 clearly outlines interventions for priority schools across a six-year trajectory, ultimately resulting in SEA intervention authorized by the SBOE. The timeline and specifics of this trajectory are detailed in section 2.D.iii. The SBOE has shown that it will not hesitate if and when intervention becomes necessary.

Of particular importance are the ways in which the LEA has the flexibility and authority to leverage SEA resources to apply interventions aligned with turnaround principles prior to the

SBOE's authority to act in the sixth year of academic probation or "F." It behooves an LEA with one or more priority schools to utilize this flexibility to retain its authority rather than allowing the SBOE to assign a special management team.

As dramatically as Indiana's accountability climate has recently shifted, the six-year timeline is far too long considering it is nearly equivalent to a student's entire middle and high school experience. Notwithstanding Dr. Bennett's impatience with mediocrity, the PL. 221 timeline must be accelerated to ensure all LEAs with one or more priority schools implement meaningful interventions. Allowing schools to linger in "F" status for six consecutive years before demanding action is an injustice to Indiana's students.

At the same time, it is hardly better to allow "D" schools and those that bounce between "D" and "F" to avoid accountability completely. For example, in the spring of 2011, eighteen schools in Indiana had been designated as "F" for five consecutive years. Eleven of these eighteen made just enough improvement to escape intervention. As a result, the clock has reset for these eleven schools. If they return to an "F" rating this year, it will take five additional consecutive years of "F" ratings before IDOE and SBOE can apply an intervention. This statutory shortcoming must soon be remedied.

Given the need to boldly intervene in the lowest performing schools, Dr. Bennett is aggressively pursuing an accelerated accountability timeline. Specifically, he seeks one in which schools that are an "F" for four consecutive years or any combination of "D" and "F" for five consecutive years would face state intervention. Dr. Bennett will ask the Indiana General Assembly to take up the issue during the next legislative session, which commences in January 2012. IDOE is counting on having an accelerated timeline ready to commence in the 2012-13 school year – far ahead of 2014-15.

PL 221 Timeline – Current versus Proposed

Status	Current timeline*	Proposed timeline (Starting in 2012-13)
Year 1	LEA holds a public hearing	LEA holds a public hearing and forwards minutes to the State Board of Education within 45 days of the hearing. This also applies if the school receives a "D" rating.
Year 2	Nothing additional	Parents of at least 51% of students in an "F" school may petition SBOE to place the school into the equivalent of Year 4 status – allowing SBOE to intervene earlier. This "parent trigger" may be implemented any time between Years 2-4.
Year 3	Nothing additional	SEA conducts a Quality Review visit to audit the school against the Mass Insight readiness framework. This Quality Review requirement applies to schools with 3 consecutive years of any combination of "D" or "F." School remains subject to the parent trigger. A "D" or "F" school remains subject to these provisions until the school achieves a "C" or higher for two consecutive years.
Year 4	SEA conducts a Quality Review visit to audit the school against the Mass Insight readiness framework.	SBOE holds a public hearing. SBOE votes on potential interventions. Schools with 4 years of any combination of "D" or "F" remain subject to the parent trigger.
Year 5	LEA implements Quality Review recommendations.	Fully implement interventions. For schools with 5 years of any combination of "D" or "F," SBOE holds a public hearing and votes on potential interventions.
Year 6	SBOE holds a public hearing. SBOE votes on potential interventions. Full implementation of interventions begins in the subsequent year.	Continue implementation of interventions.

** The current timeline only applies to "F" schools. The proposed timeline addresses both "D" and "F" schools.*

Schools after successful turnaround

Once administrative rules recently initiated by the SBOE become final, the state will have an established process for schools ending the five-year turnaround period. At the end of a TSO's four-year operational contract (which follows the initial one-year contract), the initial oversight of the school will come from a newly created local governing board. This board will be made up of three members appointed by the highest level official of the political subdivision and four members appointed by the SBOE. The initial governing body will determine the length of terms, term limits, and other governing matters. Notably, the governing body of a school may do any of the following:

1. Enter into an agreement with the school district in which the school is located for the operation of the school. Before an agreement is finalized, the SBOE:
   (A) must approve the transfer of operations; and
   (B) may set requirements for the operation of the school district.
2. Join with another school to form a single school.
3. Apply to an appropriate sponsor to become a charter school.
4. Enter into a contract with a management team to operate the school or any part of the school.
5. Enter into a contract with another school to provide educational services.
6. Operate the school.

The flexibility provided to the initial governing body provides a clear exit strategy for IDOE, as the SEA should not be in the long-term business of running schools. Moreover, this process ensures that a school that has been successful transformed does not return to the original school district by default, especially if it is in a state of chronic dysfunction.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

To exit priority status, a school must maintain a 'C' grade or better for at least two consecutive years or earn the status of being a reward school for one year.

Carrying this out would require a school to show a combination of significant improvement on proficiency rates (between ten to twenty percent) and substantially high growth over that two-year period (ranking in the top twenty-five percent of all schools in student growth). In most cases, this type of movement (i.e. grade improvement) would demonstrate that the school has made major changes in the quality of instruction provided, in how the school operates, and the methods used to teach its students. Indiana's proposed criteria makes it extremely difficult to exit priority status without establishing meaningful and long-term strategies that promise to put the students and the school on a path of future success.

Notably, a ten percent improvement in proficiency rate or showing high student growth is required to increase a school's grade to the next level. A school that is able to raise its letter grade by that amount for two or more consecutive years is unlikely to precipitously regress.

2.E Focus Schools

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

Any Title I school that receives a 'D' and is not identified as a priority school shall be classified as a *Focus School*.

Schools that receive 'Ds' under Indiana's state accountability model also have the largest achievement gaps in the state (i.e. the five percent of schools with the largest achievement gaps). In fact, ninety-five percent of the Title I schools with the largest achievement gap between their highest performing students (top seventy-five percent subgroup) and their lowest performing students (the bottom 25 percent subgroup) received 'Ds' and would be captured under this definition. These schools also have some of the largest achievement gaps across traditional subgroups as well.

Indiana's focus schools have both low proficiency rates and significant achievement gaps. It is Indiana's goal to reduce the number of focus schools by two-thirds (from sixteen percent to five percent) by 2015 and to completely remove the need for this designation by 2020.

Statewide, sixteen percent (154 schools) of Title I schools would be identified as focus schools.

2.E.ii Provide the SEA's list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

See Attachment 9, Table 2 for a list of Indiana's focus schools.

Currently, schools similar to focus schools only have to set-aside ten percent of their Title I budget for professional development. They frequently use these funds to hire instructional coaches to deliver professional development, but there is little if any accountability for achieving results. Under this proposal, IDOE will approve and require schools to select

meaningful, rigorously implemented interventions tied to the Mass Insight readiness framework IDOE uses to drive school improvement.

IDOE will require LEAs with one or more focus schools to implement scientifically-based interventions aligned with demonstrated needs supported by quantitative and qualitative data. The process and timeline for these efforts are as follows:

In Year 1, focus schools must do the following:

- Select at least three interventions, at least one from each of the three "readiness" domains, and determine how to implement each intervention with at least "Tier 2" rigor. The domains and tiers are outlined in section 2.F.
- Submit to IDOE an outline of each proposed intervention and a justification for the selections with evidence from School Improvement Plans and/or student-/school-level data
- Subject to IDOE review and requests for revisions, implement the interventions during Year 1

In Year 2, focus schools must do the following:

- Analyze student-/school-level data to determine necessary modifications to the interventions, the "rigor tier" or fidelity of implementation
    - The number of interventions and their corresponding domains can be adjusted based on demonstrated needs (i.e. at least three interventions, one from each of the "readiness" domains, are no longer required)
    - All implementation plans for proposed interventions must be at least "Tier 2" rigor
- Submit a report to the IDOE outlining each proposed intervention and justifying the selections with evidence from previous year's findings as well as School Improvement Plans and/or student-/school-level data
- Subject to IDOE review and requests for revisions, implement the interventions during Year 2

In Year 3, focus schools must do the following:

- Analyze student-/school-level data to determine necessary modifications to the interventions, the "rigor tier" or fidelity of implementation
    - The number of interventions and their corresponding domains can be adjusted based on demonstrated needs (i.e. at least three interventions, one from each of the "readiness" domains, are no longer required)
    - All implementation plans for proposed interventions must be at least "Tier 2" rigor
- Plan to make modifications to proposed interventions based on mid-year findings from IDOE-provided Technical Assistance Team Quality Review
- Submit a report to the IDOE outlining each proposed intervention and justifying the selections with evidence from previous year's findings as well as School Improvement

Plans and/or student-/school-level data
- Subject to IDOE review and requests for revisions, implement the interventions during Year 3
- Participate and comply with IDOE-provided Technical Assistance Team Quality Review
- Based on findings from the Quality Review and IDOE review (subject to requests for revisions), adjust interventions accordingly

In year 4, focus schools must do the following:
- Implement interventions and their corresponding "rigor tier" as stipulated by the IDOE, based on findings from the Technical Assistance Team Quality Review
- LEAs that choose not to comply with this expectation will not be provided school improvement funding

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

To exit focus status, a school must maintain a 'C' grade or better for at least two years or earn the status of being a reward school for one year. If a school moves from being a 'D' school up to at least a 'C' for two years, this attainment means it has made significant gains in student growth and achievement. If a school can move one letter grade and sustain that level of achievement for two years, it is likely that substantive changes were made to the instructional quality at the school.

As described in 2.D.v., it takes a ten percent improvement in proficiency rate or showing high student growth to increase a school's grade to the next level. Such an achievement is not insignificant.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOL

LEA Name	School Name	School NCES ID #	REWARD SCHOOL	PRIORITY SCHOOL	FOCUS SCHOOL
Ex. Washington	*Oak HS*	*111111100001*		*C*	
	Maple ES	*111111100002*			*H*
Adams	*Willow MS*	*222222200001*	*A*		
	Cedar HS	*222222200002*			*F*
	Elm HS	*222222200003*			*G*
TOTAL # of Schools:					

Total # of Title I schools in the State: _____
Total # of Title I-participating high schools in the State with graduation rates less than 60%: _____

Key	
Reward School Criteria: **A.** Highest-performing school **B.** High-progress school **Priority School Criteria:** **C.** Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the "all students" group **D.** Title I-participating or Title I-eligible high school with graduation rate less than 60% over a number of years **E.** Tier I or Tier II SIG school implementing a school intervention model	**Focus School Criteria:** **F.** Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate **G.** Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate **H.** A Title I-participating high school with graduation rate less than 60% over a number of years that is not identified as a priority school

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Under Indiana's proposal, priority and focus schools will be provided substantive flexibility to implement scientifically-based, student-/school-based data-informed interventions. As described below, these interventions will be tied to a framework utilized by the IDOE during Technical Assistance Team Quality Reviews – Mass Insight's "Readiness Model."

Readiness to Learn	**Readiness to Teach**	**Readiness to Act**
• Safety, Discipline, and Engagement • Action Against Adversity • Close Student-Adult Relationships	• Shared Responsibility for Achievement • Personalization of Instruction • Professional Teaching culture	• Resource Authority • Resource Ingenuity • Agility in the Face of Turbulence
Intervention Examples • School culture specialist • Attendance officer • ELA specialist • Community liaison • Family liaison	**Intervention Examples** • 8-step process • Formative assessment training (e.g., Acuity) • Revise schedule to build-in time for professional learning communities • Restructure the academic schedule to increase core content or remediation time • Tutoring or extended learning time	**Intervention Examples** • Performance incentives tied to high-need areas of instruction and/or student performance indicators • Replace principal with one who has a track record of success in school turnaround
The LEA may propose an intervention not listed above as long as it is anchored in the "Readiness Model."		

Moreover, the rigor with which an LEA is responsible for implementing these interventions will be tied to the "rigor tiers" outlined below.

Tier 1 Implementation Rigor – Overall

- Designed for all students and/or staff
- Considered requisite for the operation of the school
- Intervention implementation plans may not fall into this tier

Tier 2 Implementation Rigor – Targeted

- Designed to provide strategic, targeted modifications to one or more constitutive elements of the school, such as the following:
  - Core curriculum
  - Data-driven instruction
  - Community partnerships

Tier 3 Implementation Rigor – Highly-Targeted

- Designed as intense intervention to meet demonstrated individual or subgroup needs, such as the following:
  - English language learner support
  - Exceptional learners support
  - Specialized English/Language Arts and/or Mathematics support

In Year 1, priority schools must do the following:

- Select at least three interventions, at least one from each of the three "readiness" domains, and determine how to implement each intervention with at least "Tier 2" rigor
- Submit a report to the IDOE outlining each proposed intervention and justifying the selections with evidence from School Improvement Plans and/or student-/school-level data
- Subject to IDOE review and requests for revisions, implement the interventions during Year 1

In Year 2, priority schools must do the following:

- Analyze student-/school-level data to determine necessary modifications to the interventions, the "rigor tier" or fidelity of implementation
  - The number of interventions and their corresponding domains can be adjusted based on demonstrated needs (i.e. at least three interventions, one from each of the "readiness" domains, are no longer required)
  - All implementation plans for proposed interventions must be at least "Tier 2" rigor
- Plan to make modifications to proposed interventions based on mid-year findings from IDOE-provided Technical Assistance Team Quality Review
- Submit a report to the IDOE outlining each proposed intervention and justifying the selections with evidence from previous year's findings as well as School Improvement

Plans and/or student-/school-level data
- Subject to IDOE review and requests for revisions, implement the interventions during Year 2
- Participate and comply with IDOE-provided Technical Assistance Team Quality Review
- Based on findings from the Quality Review and IDOE review (subject to requests for revisions), adjust interventions accordingly

In Year 3, priority schools must do the following:
- Implement interventions and their corresponding "rigor tier" as stipulated by the IDOE, based on findings from the Technical Assistance Team Quality Review
- LEAs that choose not to comply with this expectation will not be provided school improvement funding

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

To bolster IDOE's monitoring of and technical assistance for LEA implementation of interventions in priority and focus schools, additional structures and supports will be built around the proposed interventions. For priority and focus schools, the LEA will be required to submit an intervention plan each year, which in turn will be reviewed by the IDOE and subject to necessary revisions. This additional check will provide meaningful monitoring and technical assistance to ensure the interventions selected from the menu of options are data-driven and reflective of the school's demonstrated needs. This review and potential revision process persists for priority schools until year 3 and for focus schools until year 4, when the LEA must align its interventions to the IDOE's recommendations based on the findings of the

Technical Assistance Team Quality Review.

Rather than creating another compliance exercise, this process is designed to align federal and state improvement efforts into a singular, coherent strategy. IDOE is serious about ensuring that all plans, interventions and uses of funds (federal and state) are closely aligned. More importantly, all plans and funds must directly address the needs of the students and be firmly grounded in relevant performance data.

ii. holding LEAs accountable for improving school and student performance, particularly for turning around priority schools; and

IDOE will hold LEAs accountable for turning around priority schools by enforcing, as demonstrated by recent actions taken by the SBOE at the recommendation of the IDOE, the interventions prescribed in P.L. 221, including changing the priority school's governance structure. Specifically, if an LEA fails to utilize the resources and authority at its disposal across a six-year trajectory for turning around its priority schools, IDOE and SBOE will take the appropriate actions to ensure a dramatic course correction is applied.

As described in 2.D.iii., Indiana recently demonstrated this commitment by directly intervening in seven of the state's persistently lowest performing schools. Five of these schools are no longer a part of the LEA and are now designated "Turnaround Academies" under the auspices of the SBOE. For a Turnaround Academy to rejoin the LEA, the SBOE will need to see that the LEA has, in the time that the Turnaround Academy has been operated by a TSO, demonstrated significant improvement in its other priority and focus schools as well as made appropriate district-level changes in staffing and structure to better support its low-performing schools. When determining the next steps for a Turnaround Academy at the end of the TSO's four-year operational contract, the SBOE will have a menu of options from which to select, including renewing the TSO's contract.

The assignment of TSOs constitutes a school restart, one of the four federal turnaround models. A recent analysis of School Improvement Grant recipients identified that less than 3 percent of all SIG interventions utilize the restart model. The fact that IDOE and SBOE selected the restart model for over two-thirds of the schools within its jurisdiction highlights the urgency that both groups bring to the critical job of turning around Indiana's lowest-performing schools. Even the application of a lead partner intervention, certainly not a mild intervention by any means, at the remaining two schools is designed to hold the LEA accountable for improving its priority schools.

Priority schools assigned a lead partner intervention by the SBOE remain under the LEA's jurisdiction. But if the priority school does not demonstrate measured and agreed upon gains and/or if the LEA impedes upon the LP's work, the SBOE has the authority and conviction to modify the intervention as soon as it deems necessary. As a result, the LEA is compelled to work collaboratively and support LPs to both retain LEA authority and ensure the marked improvement of priority schools.

iii. **ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under IDOE's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).**

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

Interventions selected by priority and focus schools will undergo a rigorous review process by the IDOE and its Office of School Improvement and Turnaround. This review process will not be compliance driven but rather rooted in high expectations that proposed interventions will be decided upon based on a theory of action and anchored in relevant quantitative and qualitative data. Moreover, IDOE will require LEAs to clearly describe its implementation plans for proposed interventions in terms of three tiers of rigor (discussed in 2.F).

If the plan is approved, IDOE specialists in the Office of School Improvement and Turnaround will conduct monitoring visits to ascertain the fidelity with which the intervention is truly being implemented. This information will in turn inform subsequent IDOE and SBOE decisions for state intervention. In the short-term, monitoring of intervention selection and implementation will inform how much flexibility LEAs are given to determine their own interventions; in the long-term, it will shape the SBOE's recommendation for state intervention.

Summary

IDOE has thoughtfully and carefully designed its new accountability system to differentiate recognition, accountability, and support. The A-F letter grades – built on top of a robust growth model and a bottom 25 percent focus that targets the achievement gap – coupled with a state accountability statute (P.L. 221) that provides for an aggressive state support and intervention mechanism fit together as part of a coherent and comprehensive system that supports continuous school improvement.

When it comes to the state's chronically lowest performing schools, Indiana proposes a tiered intervention system aligned to the latest research and best practices in school turnaround. Working alongside the SEA, successful schools and LEAs are provided greater support, flexibility, and latitude. Conversely, those that persistently struggle will receive interventions of increasing severity, proportional to the level of need at the school.

Moreover, the efficacy of this system is promising within Indiana's new education climate – one that promotes strong school choice and competition. As part of "Putting Students First," parents and families can compare traditional public, public charter, and private school options because all receive letter grades as part the state's broader effort to increase the

engagement and involvement of all stakeholders.

Kentucky

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

	in mathematics in at least grades 3-8 and at least once in high school in all LEAs. i. Provide the SEA's plan to develop and administer annually, beginning no later than the 2014–2015 school year, statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs, as well as set academic achievement standards for those assessments.	SEA has submitted these assessments and academic achievement standards to the Department for peer review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review. **(Attachment 7 on page 74 of the Appendix)**

Guidance Question: If the SEA has developed and begun annually administering high-quality assessments in all LEAs, and has set academic achievement standards, did the SEA attach evidence that the SEA has submitted a timeline showing when the SEA will submit the assessments to the Department for peer review?

Kentucky chooses Option C. For Option C, item i., see Attachment 7 on page 74 of the Appendix for the timeline of when Kentucky will submit the assessments and academic achievement standards to the U.S. Department of Education for peer review.

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Guidance Question: Did the SEA propose a differentiated recognition, accountability, and

support system, and a high-quality plan to implement this system no later than the 2012-2013

school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students?

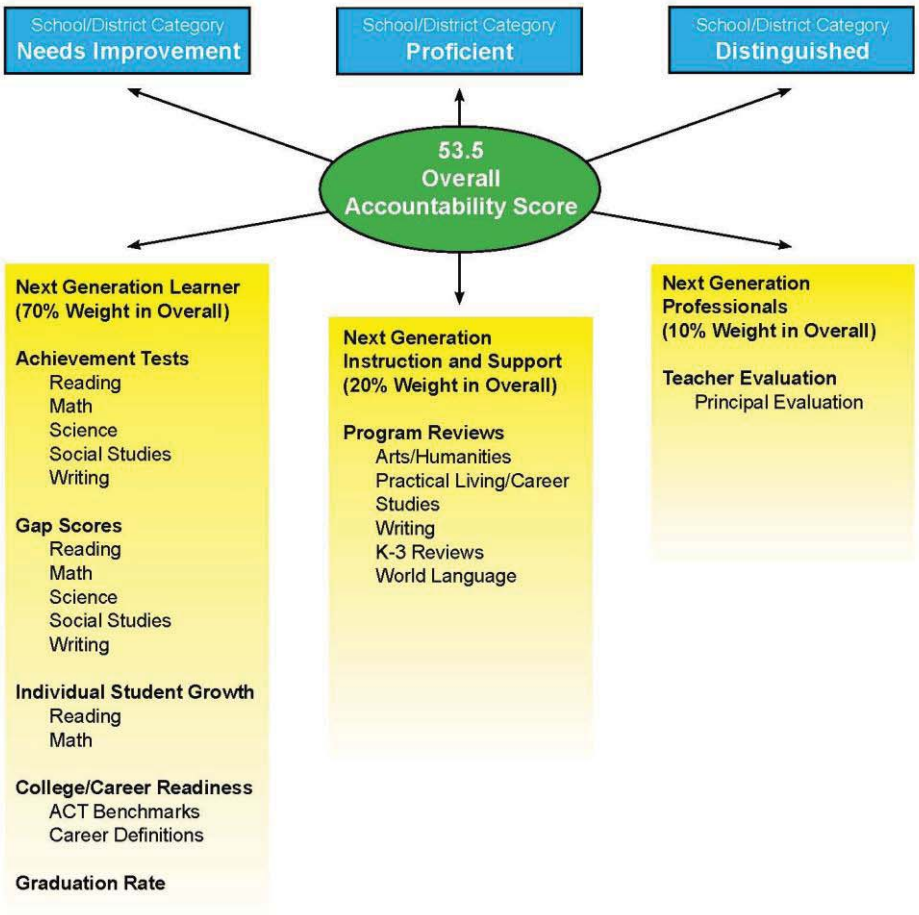
Overview of Kentucky's Accountability Model

Overview of Kentucky's Accountability Model

From a high level the model is simple. Each school/district receives an annual Overall Score based on the three components of Next Generation Learners, Next Generation Instructional Programs and Support and Next Generation Professionals. The Overall Score places the school/district into one of three categories: Needs Improvement, Proficient or Distinguished. Each of those components has a variety of indicators used to calculate the Overall Score.

The figure below illustrates how the model works.

Kentucky's Accountability Model



Detailed Narrative on Kentucky's Assessment and Accountability System

The following narrative explains in detail how the Overall Score is computed.

Education-reform legislation in 2009 paved the pathway for the next generation of school and district accountability for the Commonwealth. Following a year of discussion with educators, stakeholders and the public, the Kentucky Board of Education approved several regulations that define a new accountability model, Unbridled Learning: College- and Career-Ready for All.

Although the achievement of students continues as a critical focus and the heart of the model, Unbridled Learning expands the view of schools and districts to ensure a comprehensive look at factors that contribute to all students becoming proficient and prepared for success. The model incorporates a variety of data points and does not rely on a single narrow metric to recognize success and support improvement.

Beginning in the 2011-12 school year, this model offers a balanced approach that incorporates all aspects of school and district work organized around the Kentucky Board of Education's four strategic priorities: next-generation learners, next-generation professionals, next-generation support systems and next-generation schools/districts. The chart below details the indicators and data sources included in Kentucky's model around each of the strategic priorities. These also are specified within 703 KAR 5:200, Next Generation Learners (Attachment 20 on page 205 of the Appendix) that was approved by the Kentucky Board of Education in June 2011.

Unbridled Learning: College- and/or Career-Ready for All				
Next-Generation Learners	**Next-Generation Instructional Programs and Support**	**Next-Generation Professionals**		**Next-Generation Schools/ Districts**
Achievement (Proficiency) Gap Growth Readiness for College/Career Graduation Rate	Program Reviews	Percent Effective Teachers Percent Effective Leaders	=	Overall Accountability Score (using data from the preceding columns) Revised Report Card

Next-Generation Learners

The first component of Unbridled Learning, next-generation learners, is anchored in college and career readiness for all students. Like previous accountability models, it continues annual public reporting of disaggregated student outcome measures in required content areas. However, this more robust next-generation model also includes a focus on student achievement growth measures and performance of students in the achievement gap. It also emphasizes college and

career readiness and high school graduation rates. The table below outlines the performance measures for each category in next-generation learners.

Grade Range	Achievement	Gap	Growth	College/Career Readiness	Graduation Rate
Elementary	Tests: reading, mathematics, science, social studies and writing	Tests: reading, mathematics, science, social studies and writing	Reading and Mathematics	N/A	N/A
Middle	Tests: reading, mathematics, science, social studies and writing	Tests: reading, mathematics, science, social studies and writing	Reading and Mathematics	EXPLORE (College Readiness)	N/A
High	End-of-Course Tests** and On-Demand Writing	End-of-Course Tests** and On-Demand Writing	PLAN to ACT *Reading and Mathematics*	College/Career-Readiness Rate	AFGR*/ Cohort Model

*Averaged Freshman Graduation Rate will be used in 2011, 2012 and 2013 reporting. Reporting using the Cohort Rate will begin in 2014.
**End-of-Course tests in 2011-12 include Algebra II, English 10 (II), Biology and U.S. History.

Achievement - Achievement incorporates student performance on state-required assessments in five content areas. Kentucky's new assessment system, Kentucky Performance Rating of Educational Progress (K-PREP), includes criterion-referenced/norm-referenced blended tests in grades 3-8 and ACT's Quality Core® program for end-of-course tests in Algebra II, English 10, Biology and U.S. History. A series of on-demand writing tests are required at elementary, middle and high school levels.

Schools and districts earn full credit for students scoring proficient and above (i.e., distinguished). If all students attain proficiency, a school/district earns 100 percent in the achievement category. To recognize the work of schools and districts as students move toward proficiency, a half-credit is awarded for apprentice students. The lowest student performance level, novice, does not receive credit in the accountability model. Calculation rules were developed to prevent strongly performing students from masking or compensating for students still performing at the lowest levels. In order to receive bonus credit for distinguished students, the school must have more students performing at the highest level than at the lowest level. The Kentucky Board of Education (KBE) directed that a bonus for distinguished be added that does not mask or overcompensate for novice performance. To calculate the bonus, each percent distinguished earns an additional one-half point, and the percent novice earns a negative one-half point, so that when the distinguished and novice values are combined, the novice points may offset the distinguished bonus. If the novice performance completely offsets the distinguished bonus, no points are added to or subtracted from the achievement calculation. The bonus calculation for distinguished does not allow a school or district to score above 100 percent.

Gap - Kentucky's goal is 100 percent proficiency for all students. The Gap category of next-generation learners focuses specifically on student groups that perform traditionally below the achievement goal. Gap uses the same student test results as those included under achievement. The distance from that goal or gap is measured by creating a Student Gap Group -- an aggregate count of student groups that have historically had achievement gaps. Student groups combined into the Student Gap Group include ethnicity/race (African American, Hispanic, Native American), Special Education, Poverty (free/reduced-price meals) and Limited English Proficiency that score at proficient or higher.

The percent of students performing at proficient and distinguished in the Non-Duplicated Gap Group is reported annually for each content area. To calculate the combined student Gap Group, **non-duplicated counts** of students who score proficient or higher and are in the student groups would be summed. No individual student counts more than one time, and all students belonging to included groups are counted once. **The "N" count (number of students reported) is based on total school population, not grade-by-grade enrollment, thus causing almost every school in Kentucky to have a focus on gap groups.**

A sample illustrating the Non-Duplicated Gap Group for high school is shown in the chart below.

DEMOGRAPHIC GROUP	READING 2009 STUDENT COUNT	READING 2009 PERCENT (PROFICIENT + DISTINGUISHED)		READING 2010 STUDENT COUNT	READING 2010 PERCENT (PROFICIENT + DISTINGUISHED)
Non-Duplicated Gap Group*	**279**	**36.20**		**279**	**35.13**
*African-American	163	34.97		154	25.97
*Hispanic	20	50.00		15	46.67
*Native American	0	0		0	0
*With Disability	66	12.12		52	19.23
*Free/Reduced-Price Meals	237	36.71		263	35.36
*Limited English Proficiency	19	21.05		26	3.85
Other Groups Report					
All Students	303	38.28		304	38.16
Male	175	32.00		165	31.52
Female	128	46.88		139	46.04
White	107	41.12		111	50.45
Asian	4			16	50.00
*Groups included in Gap					

Key Questions and Answers

1. *Does the model lose a focus on individual gap groups by creating a single Student Gap Group?*

No. The model actually fixes problems with a more traditional approach to gap groups. A major problem of using individual groups is the count of students. Small student counts allow a school to ignore small groups of students. The Kentucky model solves the problem by putting all gap groups into a single group. In the past, many schools would not have to worry about subgroups with small n-counts. By placing all the subgroup students into one single group, the n-count increases for all schools.

In simulations for all Kentucky schools, 99 percent of the schools in the state would have a Student Gap Group; thus, the model actually increases the motivation for schools to improve the achievement of all students. Students cannot be ignored due to a statistical n-count rule. In the high school sample chart found above, two groups, Limited English Proficient and Hispanics, could have been ignored in traditional models due to the n-counts, but in the single Student Gap Group model, all students would need to be targeted for growth.

In addition, the new model provides a single goal for schools. In the old model, there were up to 16 individual gap group goals. By reducing the goals from 16 to 1, the focus of the school can be targeted and managed in a more efficient way. Schools are not overwhelmed by the myriad of goals facing them; they focus on one single goal, and by raising that one goal, the achievement rises for the subgroup students.

2. *Will subgroups scores be reported?*

Yes, all subgroup performance will be publically reported, and all subgroups will have Annual Measurable Objectives (AMOs) created through the Kentucky Board of Education's strategic planning process.

Detailed Narrative on Kentucky's Assessment and Accountability System (Continued)

Growth - The Growth category uses a Student Growth Percentile. It compares an individual student's score to the student's academic peers. It recognizes schools and districts for the percentage of students showing typical or higher levels of growth. The scale for growth is determined at equal intervals with typical growth beginning at the 40th percentile. For elementary and middle schools, growth is based on annual reading and mathematics tests in grades 3-8. At high school, the same model of recognizing student performance along a scale uses the PLAN (grade 10) and ACT (grade 11) composite scores in reading and mathematics for comparison. Points are awarded for percentage of students showing typical or higher growth.

College/Career Readiness - The Commonwealth of Kentucky is focused on making college and career readiness a reality for every Kentucky student. To identify students as college- and career-ready, the Kentucky Board of Education (KBE) has approved indicators of readiness that include students meeting:

(1) the Kentucky Council on Postsecondary Education's Systemwide Benchmarks on the ACT in Reading (20), English (18) and Mathematics (19)

or

(2) the Kentucky Council on Postsecondary Education's College Placement Test Benchmarks

or

(3) career academic and technical benchmarks

The following chart represents the definition of College/Career Readiness approved by the KBE in August 2011.

Kentucky Department of Education Proposal: Career Measures Definition
College Ready, Career Ready, and College AND Career Bonus

College Ready: Must meet benchmarks on one of following:

College Ready
ACT
COMPASS
KYOTE

Career Ready: Must meet benchmarks for one requirement in Career Academic area and must meet one requirement in Career Technical area.

Career Ready Academic	Career Ready Technical
Armed Services Vocational Aptitude Battery (ASVAB)	Kentucky Occupational Skills Standards Assessment (KOSSA)
ACT Work Keys (Applied Math, Locating Information, and Reading for Information)	Industry Certificates

Bonus - College AND Career Ready: Must meet at least one from each area.

College Ready Academic	Career Ready Technical
ACT or COMPASS or KYOTE	KOSSA
Notes: (1) By meeting the college ready academic definition, the student does not have to take the additional tests of ASVAB or WorkKeys for the bonus area. (2) For accountability purposes, the bonus shall not allow the readiness percentage to exceed 100 percent.	Industry Certificates

The College/Career Readiness Rate (CCRR) is a percentage calculated by dividing the number of high school graduates who have successfully met an indicator of readiness for college/career with the total number of graduates. The indicators of readiness include student performance on the ACT, completion of college placement tests or attainment of Career-Ready Academic and Career-Ready Technical benchmarks. The KBE approved a half-point bonus to be added to the report for students who are considered both college- and career-ready.

In September 2010, a Readiness goal was established for schools, districts and the state to improve their 2010 Readiness percentages by at least 50 percent. The improvement goal was

derived by subtracting the 2010 readiness percentage from the maximum of 100 percent readiness, then dividing by two. This value was then added to the 2010 percentage to establish a 50 percent improvement goal for 2015.

While reporting will continue to show an improvement goal, the percentage of students demonstrating readiness (i.e., Readiness Rate) will be included in next-generation learners. For the middle school level, college readiness is based on student performance on the EXPLORE assessment administered at Grade 8. The percent of students meeting the ACT-established benchmarks for EXPLORE in reading (15), English (13) and mathematics (17) is reported. The percent of students meeting the benchmark in each content area is averaged to generate a middle school college readiness percentage.

Graduation Rate - A graduation rate for each school and district will be reported annually as a category of next-generation learners. The U.S. Department of Education (USED) has approved Kentucky's use of the Averaged Freshman Graduation Rate (AFGR) calculation formula for reporting in 2011, 2012 and 2013. AFGR allows Kentucky to report graduation rates disaggregated by student groups while Kentucky implements data collection for the reporting of the Cohort Rate in 2014. AFGR does assume an equal inflow and outflow of students. Many of Kentucky's communities are losing population, and AFGR does not have a process to account for such changes.

Through a separate waiver request, Kentucky is seeking permission from the USED to use the Cohort model for a small number of these schools and districts instead of the AFGR.

Overall Score Reporting for Next-Generation Learners - Individual student data collected from the assessments and college/career readiness and graduation rates generate a numeric value for each category of next-generation learners -- Achievement, Gap, Growth, College/Career Readiness and Graduation Rate. The value for each category is weighted to create a final overall score for next-generation learners. The following table illustrates the weights.

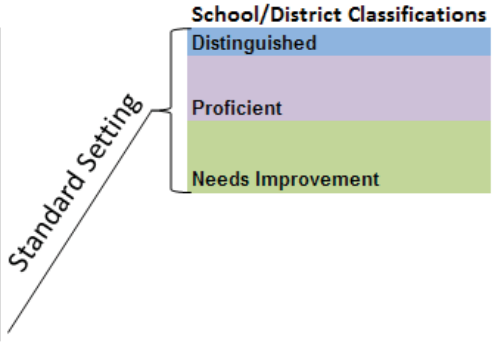
Grade Range	Achievement	Gap	Growth	College/Career Readiness	Graduation Rate	Total
Elementary	30	30	40	**N/A**	**N/A**	**100**
Middle	28	28	28	16	**N/A**	**100**
High	20	20	20	20	20	**100**

The KBE approved that students enrolled for a full academic year (a minimum of 100 instructional days) will be included in the calculations for Achievement, Gap, Individual Student Growth and Readiness for College/Career for a school and district. For Graduation Rate, students enrolled and students earning diplomas will be included in the calculations. Next-Generation Learners will report a single number combining the categories.

KBE asked that, within each classification, an indicator be added to show the direction in which the performance of the school/district is moving. This is illustrated by the figure below.

Kentucky High School Sample

	Raw Score	School Weighted Score
Achievement Points Earned	67.5	13.5
Gap (Percent Proficient and Distinguished)	39%	7.8
Growth (Percent Typical or Higher)	49.50%	9.9
College/Career Readiness (Percent of Students Ready)	38%	7.6
Graduation Rate	83%	16.6
Total	N/A	55.4



Next-Generation Instructional Programs and Support

The second component of Unbridled Learning, next-generation instructional programs and supports, is based on requirements from legislation enacted in 2009 that established Program Reviews as part of a new assessment and accountability model. A Program Review is: *"…a systematic method of analyzing components of an instructional program, including instructional practices, aligned and enacted curriculum, student work samples, formative and summative assessments, professional development and support services, and administrative support and monitoring."*(KRS 158.6453(1)(i))

Program Reviews are required in legislation for arts & humanities, writing and practical living/and career studies. The KBE expanded the legislative requirements by adding K-3 and world language Program Reviews. (See Attachment 21, page 213 of the Appendix, 703 KAR 5:230, Next Generation Instructional Programs and Support, for the Program Review requirements adopted by the Kentucky Board of Education in August 2011 with additional amendments made in October 2011.) The Program Reviews serve a number of purposes, which include:

- improving the quality of teaching and learning for all students in all programs
- allowing equal access to the 21st century learning skills that will assist them in being productive citizens to all students
- allowing student demonstration of understanding beyond a paper-and-pencil test
- ensuring a school-wide natural integration of the program skills across all content, beyond the program areas

The review of a program should be an ongoing, year-round, reflective process. Through careful review, schools will be able to identify strengths, which can be shared with other programs within the building. A careful review also will allow for the identification of weaknesses and areas of growth. It is to a school's advantage to communicate the Program Review process and documents to all staff. As staff members identify their roles in supporting school programs, they can contribute to the process of evidence identification and program improvement.

Next-Generation Professionals

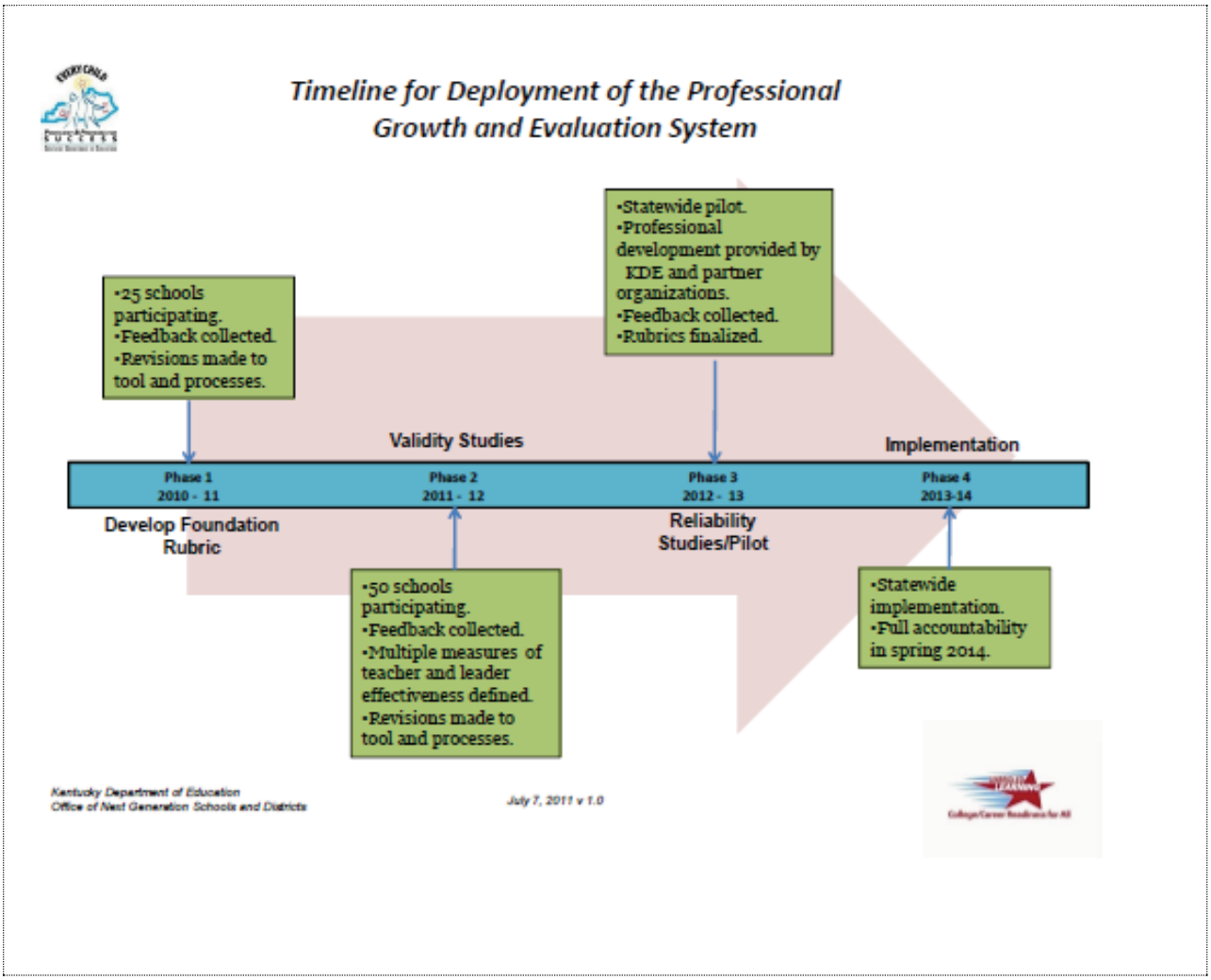
The third and final component of Unbridled Learning, next-generation professionals, recognizes that student success is supported by effective educators. The goals of this component are to equip

educators with critical tools, including guidance, systems of support and a measurable model of educator effectiveness based on student achievement. Schools and districts need support to identify and recruit educators, ensure diversity, and retain and professionally grow an educator workforce of the highest quality to teach in Kentucky schools.

The vision for the Professional Growth and Effectiveness System (PGES) is to have every student taught by an effective teacher and every school led by an effective principal. The goal is to create a fair and equitable system to measure teacher and leader effectiveness and act as a catalyst for professional growth. The system will consist of multiple measures of student growth as well as components to measure leadership, professionalism, instruction, learning climate and assessment practices. The key strategies to design and implement the system include collaboration with education partners and the intentional involvement of school districts and schools, along with support and guidance from steering committees.

Next-generation professionals reporting will share at an aggregate level, the percent of teachers and leaders at the accomplished level on Kentucky's new Professional Growth and Evaluation System. The Kentucky Department of Education will not report individual teacher or leader evaluation data.

In the figure found below, the timeline for the deployment of the Professional Growth and Evaluation System is reflected, also indicating when this component will be included in the state's accountability (spring 2014).



Overall Score for Unbridled Learning: College- and Career-Ready for All

Schools and districts will receive reports for each component (Next-Generation Learners, Next-Generation Instructional Programs and Support, and Next-Generation Professionals) that place them in a classification (Distinguished, Proficient, Progressing and Needs Improvement). Then, an overall score for Unbridled Learning: College- and Career-Ready for All system will be assigned to each school/district. This combined score will be compiled by weighting the three components in the following manner:

Next-Generation Learners	70%
Next-Generation Instructional Programs and Support	20%
Next-Generation Professionals	10%
Overall Score	100%

The Overall Score process is specified within 703 KAR 5:220, Categories for Recognition, Support and Consequences that was originally approved by the Kentucky Board of Education in August 2011; however, it is undergoing revisions to align the regulation with the ESEA waiver

requirements and secure additional constituent review and will come back to the board in either December 2011 or February 2012 for final consideration.

Until the other components are completed, only the Next-Generation Learners component will be used to generate an overall score for accountability in the first year of the system. The following chart provides the overall score phase-in for the three components.

Overall Score Phase-In

Year	Component	Percentage of Overall
2011-12	Next-Generation Learners	100%
2012-13	Next-Generation Learners Next-Generation Instructional Programs and Support	77% 23%
2013-14	Next-Generation Learners Next-Generation Instructional Programs and Support Next-Generation Professionals	70% 20% 10%

The single overall accountability score will be the trigger for recognition and support for schools and districts and the creation of Annual Measureable Objectives (AMOs). The overall number incorporates a robust set of success factors, but remains strongly focused on the performance and attainment of individual students, with 70 percent of the overall score derived from Next-Generation Learners. This single overall accountability number reflects far more than student performance on a single test, but is heavily weighted toward student achievement.

Key Questions and Answers

1. Does the Kentucky model raise the "bar" for students?

Yes, the Kentucky accountability model raises the expectations for students since it is aligned with college- and career-ready standards and includes emphasis on multiple indicators. See the illustration below.

Old Model	New Model
Standards Kentucky-Developed Standards **Indicators** Achievement Gap Graduation Rate	**Standards** College Readiness Standards (accepted by all Kentucky public colleges and universities) **Indicators** Achievement Gap Student Growth College/Career Readiness Graduation Rate Program Reviews Professional Evaluation

The new college- and career-readiness standards are more rigorous than the previous state-developed standards. The ultimate goal of the system is that every student is college- and/or career-ready. The new standards raise the bar for educators, students and parents in Kentucky.

2. *Will the weights of the system ensure that all students achieve the college- and career-ready standards?*

Next-Generation Learners is the component of the model that uses individual student achievement. This component is intentionally weighted at 70 percent in order to put leverage on all students meeting college- and career-readiness standards. In addition, within Next-Generation Learners, the high school components of achievement, gap, growth and college readiness all connect to the ACT, PLAN and end-of-course tests that link to college/career readiness standards. The Grade 3-8 tests are linked to the high school college/career standard. A school cannot make gains in the accountability system without improving the achievement levels of all students.

3. *Since there are so many indicators, can a school game the system?*

The weight on each component helps alleviate gaming of the system. Next-Generation Learners accounts for 70 percent of the Overall Score. This component contains the achievement scores, gap scores, individual student growth and college and career readiness rates. Each of these areas relies heavily on the academic tests in the system. In order to move the Overall Score number, schools will have to raise achievement. Achievement stays in the forefront in this model. Schools will need to concentrate on the Next-Generation Learners component to make gains in the system.

4. *Why is Kentucky using the Averaged Freshman Graduation Rate (AFGR) during the first years of the system?*

Kentucky changed vendors for its statewide Student Information System (SIS) in 2008. The first time the new system could flag first-year freshmen was in 2009. This caused the Cohort Rate to be delayed until 2013. During the interim period, Kentucky is using AFGR. This has been approved by the U.S. Department of Education.

Detailed Narrative on Recognition, Support and Consequences

At its center, Kentucky's recognition, accountability and support system has an assessment system that uses multiple indicators to measure progress in the areas of achievement, gap, growth, college and career readiness and graduation rate. As a result of 2009's Senate Bill 1 and new requirements related to the federal School Improvement Grant process and the requirements of the federal State Fiscal Stabilization Fund, Phase 2, Kentucky developed a new system of Educational Recovery as a part of the Unbridled Learning initiative. This model has guided the turnaround process in Kentucky's persistently lowest-achieving schools and remains in use. As a result of Kentucky's extensive work in development of that system, and because of the level of success achieved to date, the decision was made to continue the District 180 model as the centerpiece of our rewards and accountability system and to use the flexibility afforded by the

ESEA waiver to expand the concept, include additional methods of assistance to schools, provide more individualized feedback and support, and ascertain the scalability of all or some of the components on a statewide basis. While the process has been used with schools identified as persistently-lowest achieving in the past, it will now be used with Priority Schools and expanded to organize, inform and support the processes used with Focus Schools and other schools not satisfactorily progressing.

The guiding principle of the District 180 concept is to support schools in the creation of systems that will result in teacher efficacy and student improvement. In too many turnaround processes, the interventions designed to create improvements are externally imposed. This often leads to success during the period that the external assistance is available, but a reversion to previous practice once the supports are removed. The District 180 process is designed to build capacity in schools, districts, universities, educational cooperatives and KDE staff in order to increase their effectiveness, as well as to create lasting relationships between these groups that will provide a continuous process of learning and support for all schools across the Commonwealth.

In Priority Schools, the Leadership Assessment is the means by which areas of improvement are identified and prioritized, and the Comprehensive School Improvement Plan is the means by which these prioritized needs are addressed. For the Priority Schools, School Improvement Grant applications outline the strategies that will be funded through that process. Capacity building begins with targeted professional development, including the organization of Teacher Turnaround Teams. Schools develop shorter-term, 30-60-90-day plans to address immediate concerns and have access to the planning and monitoring component of the Adaptive System of School Improvement Support Tools (ASSIST) process to develop long-range plans and monitor implementation and impact.

To assist in greater expansion of these practices to all schools in need of improvement, Kentucky will use waivers of the following provisions:

- identification of school districts and Title I schools for improvement, corrective action or restructuring if they fail to make AYP for the specified number of years
- limitations of participation in and use of Small Rural School Achievement and Rural and Low-Income Schools funds
- the requirement that a school have a poverty percentage of 40 percent or more in order to operate a school-wide program
- the requirement that 1003(a) funds may only be used for schools identified for improvement, corrective action or restructuring
- the restrictions on the use of rewards funding
- restrictions on the amount of funding that may be transferred from other programs into the Title I program
- the definitions and requirements regarding how 1003(g) funding may be used

These waivers will allow Kentucky the flexibility to combine:

- 1003(a) funds
- the 20 percent of the local Title I allocation previously reserved for Supplemental Education Services (SES) and transportation funding

- the regular Title I Part A and Title II Part A allocations
- any other available federal funds in accordance with the requirements of those programs
- any other available state and local resources

Further, Kentucky will allow schools eligible to be identified as Priority and Focus Schools that are currently identified as Targeted Assistance Schools to become school-wide programs.

Some of the activities that this will allow include:

- providing additional training to extend the learning for Educational Recovery Specialists, Educational Recovery Leaders and other staff to work with Teacher Turnaround Teams in year-long institutes to offer intensive follow-up in order to build capacity within schools serving traditionally disenfranchised students
- focusing on greater individualization of school plans and the provision of additional support for differentiated follow-up based upon the needs identified in the school/district plan by utilizing a planning and monitoring tool
- incentivizing and spotlighting valued practices and valued results by identifying and targeting rewards schools as demonstration sites for Priority, Focus and Needs Improvement Schools
- determining methods by which to support schools in the implementation of extended learning time and additional methods to increase teacher effectiveness

Ultimately, Kentucky will utilize the flexibility to target capacity building within Priority and Focus Schools through better-trained educational recovery experts; a sustainable professional development plan that creates highly effective teachers within schools that serve the areas of highest need; and a rewards system that identifies, magnifies and incentivizes results.

Kentucky has shown a commitment to supporting its most disenfranchised students. This waiver will provide the flexibility needed to identify and support schools in an innovative way. Kentucky will see student and school success through multiple methods. It also will enable the state to focus support ensuring deliverables are achieved in the following ways.

Priority Schools	• better-trained capacity building experts • Leadership Assessment connected to Planning/School Improvement Grants • better-trained capacity building experts • Diagnostic Reviews • professional development experiences aimed toward teacher turnaround teams • system of identification based on a multiple indicators such as AMO/AYP • extended learning time • connecting Priority Schools to professional growth opportunities through effective teacher evaluation

Focus Schools	• focus on closing gaps in high-gap schools • an electronic planning and monitoring process through ASSIST (Adaptive System of School Improvement Support Tools) • flexible system to respond to schools not addressing the gap
Needs Improvement	• access to an electronic planning and monitoring process known as ASSIST • access to effective teacher evaluation system and training (in future) • Title I staff consultancy/resource • corrective action district coaching and training

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☒ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: **a.** provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and **(Attachment 8, page 79 of the Appendix)** b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

Guidance Question: Did the SEA include student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools?

Attachment 8 in the Appendix on page 79 provides the percentage of students in the "all students" group that performed at the proficient level on the state's most recent administration of each assessment for all grades assessed.

Since major education-reform legislation was passed in 1990, Kentucky has been committed to students receiving a well-rounded educational experience. Schools and districts must provide for instruction beyond reading and mathematics and be accountable for student performance in multiple content areas. Kentucky's new assessment and accountability program requires summative or end-of-course testing in five content areas (reading, mathematics, science, social studies and writing). Each content area contributes equally in the Next-Generation Learner categories of achievement and gap. The category of growth, using a student growth percentile, requires testing of the content area for two years consecutively. Growth includes reading and mathematics results only. Reading and mathematics testing is required annually in grades 3-8. At high school, Kentucky requires PLAN at grade 10 and ACT at grade 11. The reading and mathematics tests in PLAN and ACT will be used in the growth calculations. The end-of- course tests are administered as students complete course work; therefore, students will take the tests throughout the high school experience.

The content areas of arts and humanities, practical living/career studies and writing are assessed using Program Reviews. (The Kentucky Board of Education also is considering the addition of Program Reviews for K-3 and world language.) The Program Review results are included in the Next-Generation Instructional Programs and Support component of Unbridled Learning. Each content-area Program Review contributes equally to the score of this accountability component. The three Program Review areas required in legislation (arts and humanities, practical living/career studies and writing) will enter the accountability system in 2012-13 following a full-scale implementation pilot in 2011-12. A proposed Program Review in K-3 will have a full-scale implementation pilot in 2012-13 and enter the accountability system in 2013-14. A proposed world language Program Review will have its full-scale implementation pilot in 2014-15 and will enter the accountability system in 2015-16.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

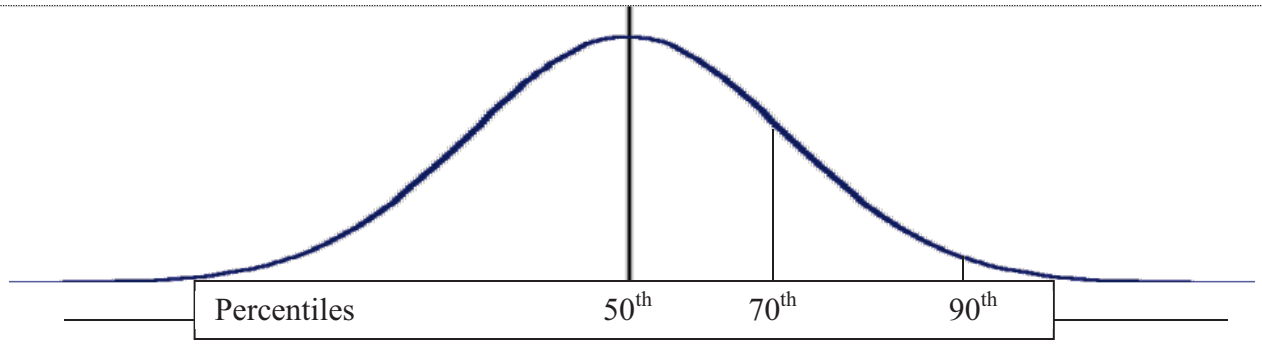
Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal increments toward a goal of reducing by half the	☐ Set AMOs that increase in annual equal increments and result in 100 percent of	☒ Use another method that is educationally sound and results in ambitious but

percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. **(Attachment 8, page 79 of the Appendix)**

Guidance Question: Did the SEA describe the method it will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics, for the State and all LEAs, schools, and subgroups, that provide meaningful goals and are used to guide support and improvement efforts through one of the three options?

Kentucky chooses Option C – another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools and subgroups.

Overview of Accountability Categories and Annual Measurable Objective



Needs Improvement	Proficient	Distinguished
Progressing: Schools making AMO/AYP		
Priority Schools		
Focus Schools - (1) 10% Gap Group		
Focus Schools – (2) Third Standard Deviation Model to Locate Individual Gap Groups		

Kentucky's model is a continuous improvement model requiring schools to increase achievement across time. The ultimate goal of the system is to move all schools to an Overall Score of 100.

The model uses a normative approach.

1. Each school/district receives a single Overall Score (explained in Section 2A).
2. The Overall Score places school/district into a category: Needs Improvement, Proficient or Distinguished.
3. The Overall Score will be used to create an annual improvement goal for all schools. The annual goal is called an Annual Measurable Objective (AMO).
4. Using the Overall Score, a mean and standard deviation is computed for each level (elementary, middle, high).
5. The goal in each cycle for below proficient schools/districts is to move a full standard deviation in a five-year period; therefore, each annual goal is to move 1/5 of standard deviation. Schools/districts at Proficient must move half of a standard deviation in a five-year period.
6. The Overall Score and AMO status would locate schools for recognition and support.
    a. Priority Schools are the currently identified persistently low-achieving schools (PLAs).
    b. Focus Schools (Group 1) are the bottom 10 percent of all Title I schools and have not met AMO/AYP for two years using the Student Gap Group Score as the indicator.
    c. Focus Schools (Group 2) uses the Third Standard Deviation Model to locate individual gap groups needing improvement. All schools from high-performing to low-performing may have gap groups needing improvement.
    d. Schools of Distinction, Highest Performing are in the 95th percentile or higher of all schools on the Overall Score and have met their current year AMO/AYP.
    e. Distinguished schools are in the 90th percentile or higher of schools on the Overall

Score and have met their current year AMO/AYP.

f. High Progress Schools have the top 10 percent improvement over a two-year period and have met their current-year AMO/AYP.

7. Schools making their AMO/AYP would be called Progressing. Schools falling outside the Proficient or Distinguished categories and not making AMO/AYP would be called Needs Improvement.

Elementary School AMO Example
Mean of Overall Score = 68 Standard Deviation = 10 Annual Goal = 2 (which means a growth of 10 points over five years or a growth of one standard deviation from the starting point)

Detailed Narrative of the Accountability Categories and Annual Measurable Objective

The new Kentucky accountability measure is built upon the concept of a continuous improvement model. Continuous improvement models are used by major corporations (i.e., Toyota) and major educational reform groups (i.e., Baldrige Performance Excellence Program). The goal of continuous improvement is to improve the system of education constantly and forever by improving the quality of student achievement. By using a continuous improvement model, Kentucky will be able to set realistic, statistically-based goals that are achievable, but constantly stretch schools to continually improve. The goal of continuous improvement is to reduce the variation in school performance by moving the entire group of schools to higher and higher performance. As schools reach a performance level, the group goal is shifted to stretch the goal to a higher level. Over time, goals continually increase based on group performance, and as the low-end schools improve, variability is decreased. The ultimate goal is reaching the score of 100 in the Overall Score.

Method - As described in section 2A, the new Kentucky accountability model will create a single Overall Score for three major components. Those three components are:

(1) Next-Generation Learners, which incorporates achievement scores (reading, mathematics, science, social studies and writing), gap scores, individual student growth, college/career readiness and graduation rate

(2) Next-Generation Instructional Programs and Support, which incorporates Program Reviews in the areas of arts/humanities, practical living/career studies, writing, K-3 and world languages

(3) Next-Generation Professionals, which incorporates measures of teacher and leader effectiveness

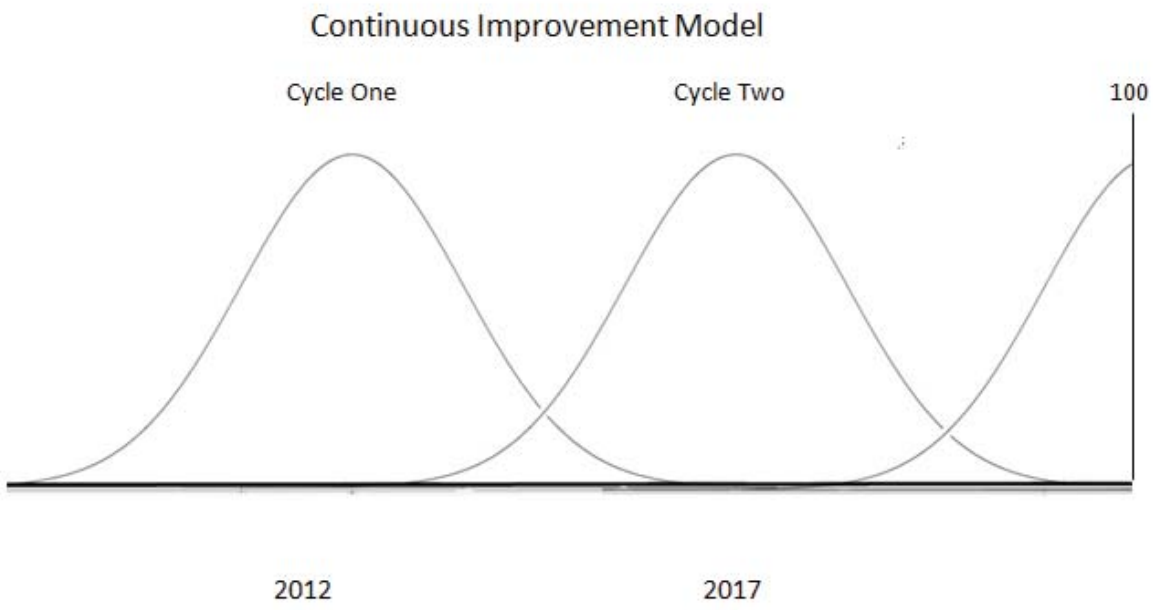
The Overall Score broadens the concept of school success to include a multifaceted, balanced set of indicators.

The Overall Score will be used to create the distribution of schools in the state. The 70th percentile will be the Proficient level, and the 90th percentile will be the Distinguished level. All schools falling under the Proficient level will be called Needs Improvement Schools. The top 5 percent

will be Kentucky Schools of High Distinction and are described in the Rewards Section. Schools already designated as persistently lowest-achieving schools (PLAs) pursuant to Kentucky state law (KRS 160.346) will be the Priority Schools. All schools, both Title I and non-Title I, would have an AMO/AYP goal.

Using the Overall Score, Kentucky's continuous improvement model will compute, by level, an average state score and standard deviation. The standard deviation rate for each level will be divided by five to generate a growth goal for that period of years. The Annual Measurable Objective (AMO) will require a school to gain 1/5 of a standard deviation for each year in the five-year period. The AMO/AYP goal is locked in for the five-year period, but at the end of the five-year period a new set of averages and standard deviations would be run to set the next five-year goal. An acceptable level of Proficient performance would be set at the 70th percentile; this score line provides an acceptable zone for schools scoring at the top end of the distribution. The 70th percentile was intentionally chosen because it places schools in approximately the top 30 percent of the distribution and it provides a score that educators, parents and the public can understand.

Schools scoring below the Proficient level would need to achieve the full AMO described above. Proficient or higher scoring schools would need to achieve one-half of the state AMO/AYP goal. Using this method, the lower-achieving schools must improve at a higher rate than the top-scoring schools. See the figure below for an illustration of the model.



Every school in the state will have an AMO/AYP goal. If the school obtains the AMO goal, then the school has made Adequate Yearly Progress (AYP).

In addition, annual data runs would occur to monitor the shifting of the average and standard deviations. **During the five-year period, Kentucky would constantly evaluate the system for**

modifications.

This model accomplishes several important goals. First, since it is based on a distribution and continuous improvement model, low-scoring schools would have achievable goals because there are many, many schools above them that show the scores are obtainable. Second, all schools will have a standard deviation target based on a statistical model, thus creating a fair, achievable goal. Third, as the schools increase their scores, the goals are re-set at the end of the five-year period for the group, thus ensuring that all schools are constantly and forever increasing their performance. There is no end date in this model; it continues with the ultimate goal of 100 percent on the Overall Score as the target. As it continues, the group average will rise, the standard deviation will decrease, and schools continue on an ever-increasing path toward excellence.

The table below provides a visual description of the AMO goals. (Option C, item i.)

AMO Simulated Data for Illustration Purposes							
Winter 2010							
	Average	Stdev	AMO for schools scoring below proficient (Stdev/5 Year Goal)	AMO for schools scoring above proficent (Stdev/5 Year Goal x .5)	70th Percentile		
Elementary School	68	10	2.0	1	73.7		
Middle School	61	9	1.8	0.9	65.4		
High School	52.8	7.9	1.6	0.79	56.2		
Elementary Sample	Baseline	Year 1	Year 2	Year 3	Year 4	Year 5	
School A (Low)	58	60.0	62.0	64.0	66.0	68.0	
School B (Average)	68	70.0	72.0	74.0	75.0	76.0	
School C (High)	78	79.0	80.0	81.0	82.0	83.0	
Middle Sample	Baseline	Year 1	Year 2	Year 3	Year 4	Year 5	
School A (Low)	52	53.8	55.6	57.4	59.2	61.0	
School B (Average)	61	62.8	64.6	66.4	67.3	68.2	
School C (High)	71	71.9	72.8	73.7	74.6	75.5	
High Sample	Baseline	Year 1	Year 2	Year 3	Year 4	Year 5	
School A (Low)	44.9	46.5	48.1	49.6	51.2	52.8	
School B (Average)	52.8	54.4	56.0	57.5	58.3	59.1	
School C (High)	60.7	61.5	62.3	63.1	63.9	64.7	
70th Percentile is the line of proficient performance.							
Green Areas show scores above the line of proficient performance.							
Once a school reaches proficiency (green area above), the AMO is the AMO for schools scoring above proficient.							

Phase-In of Components - The three major components of Unbridled Learning: College- and

Career-Ready for All phase in over a three-year period. In 2011-12, the Next-Generation Learners component becomes operational. In 2012-13, the Next-Generation Instructional Programs and Support component is added, and finally, the Next-Generation Professionals component is added in 2013-14. The AMO goals described above would provide a clean baseline and goal for the end of each school year. As a new component is added, the baseline average and standard deviation would be computed, and a new annual goal would be developed. After the last component is added in 2013-14, the model is complete, and the baseline and goals can be computed for a new goal.

All schools, Title I and non-Title I, are eligible to be Reward, Priority or Focus Schools. All schools would be placed on the same distribution scale; however, the final reports will show Title I and non-Title I Reward, Priority and Focus Schools.

Locking the Goal for Five Years

Until all three components of the Unbridled Learning: College- and Career-Ready for All system are phased in to the model, annual baselines and goals will be set. Once all three components are operational in 2013-14, the distribution will be calculated to locate the 70th percentile (Proficient) and the 90th percentile (Distinguished). The raw score associated with these cut points will then be locked for a five-year period. By locking the goal lines at the raw score, all schools will be allowed to have a consistent five-year goal that will not change. At the end of the five-year period, the distribution will be recalculated, and a new set of cut points will be determined. Then, those cuts will be locked for a five-year period. With full implementation of the model, schools are not faced with an annual redistribution of scores, but have a solid goal to work toward.

For Option C, item iii., see Attachment 8 on page 79 in the Appendix for a copy of the average statewide proficiency based on assessments administered in the 2010-11 school year in reading/language arts and mathematics for the “all students” group and all subgroups.

Setting AMO Goals for Each Subgroup

Besides having the AMO goal for each school described in the sections above, it is critical to understand that each year, the Kentucky Board of Education (KBE), though its strategic planning process, will set AMO goals for each subgroup at the state, district and school level. Each subgroup will have an individual AMO, which will be reported annually in the School/District Report Card and will call for an intervention plan to raise the achievement of the subgroup. The KBE Strategic Plan and Annual Targets will provide a reporting system that is parallel to the state accountability system.

Utilizing the single AMO score enables districts and schools to simplify reporting for parents and communities. Simplifying the reporting will help alleviate the confusion caused by the current NCLB reporting. However, Kentucky does not want to lose the focus on raising achievement of subgroups. The Focus School methods (see Section 2E) include the required location of 10 percent of the schools with gap scores and through the consultation process the Third Standard Deviation Model (see Section 2Ei, page 65) was added that will capture any district or school subgroup that performs three standard deviations below the ALL group proficiency average for the state. This will allow Kentucky to capture more schools in the Focus School category than the 10 percent

requirement. Also, this will allow Kentucky to capture high-performing schools that may have one or more subgroups performing significantly below the state average.

In addition, Kentucky has been collaborating with Sir Michael Barber and the Education Delivery Institute to develop delivery plans for college/career readiness, proficiency, closing gaps and teacher/principal effectiveness. Working with schools and districts to assist them in meeting their AMO goals is part of the delivery planning process. For more information on delivery plans and an example of the college/career readiness plan, go to the Appendix, Attachment 17 on page 163.

The delivery plan for closing achievement gaps will set annual targets for the state, districts, schools and subgroups based on a model similar to Option A, Section 2B of the ESEA waiver. The subgroup performances at the state, district and school levels will be reported as part of the annual progress toward the goal. The goal shall be reducing by half within five years the percentage of students in each subgroup scoring in the non-proficient category. The annual state report cards will provide this level of detail on progress toward goal. An example of what will be reported is found in the table below.

District/School Example

	Baseline Proficiency	AMO Target	2011-12 Goal	12-13 Goal	13-14 Goal	14-15 Goal	15-16 Goal
African-American	34%	6.6%	40.6%	47.2%	53.8%	60.4%	67%
Hispanic	40%	6%	46%	52%	58%	64%	70%
Native American	30%	7%	37%	44%	51%	58%	65%
With Disability	40%	6%	46%	52%	58%	64%	70%
Free/Reduced-Price Meals	20%	8%	28%	36%	44%	52%	60%
Limited English Proficiency	34%	6.6%	40.6%	47.2%	53.8%	60.4%	67%
College/Career	30%	7%	37%	44%	51%	58%	65%
Proficiency Gap	40%	6%	46%	52%	58%	64%	70%
Overall Gap	30%	7%	37%	44%	51%	58%	65%

*Annual target is derived by subtracting baseline from 100 percent and dividing result by 2 and then by 5. This allows for lower-performing schools/districts to have different target goals than higher-performing schools/districts.

+Gap groups must have a minimum of 25 students to be reported; however, all students in any ESEA gap group would be reported in the overall gap group.

Key Questions and Answers

1. *What does the state accountability AMO/AYP simulation data look like for a single school?*

Example:

District	School	Achievement Score	Gap Score	Growth Score	College or Career Readiness Score	Graduation Rate Score	Overall Score	Percentile Rank on Overall Score	AMO Goal for Year 1
Bullitt County	Bullitt East High School	13.2	6.0	11.5	8.8	15.8	55.3	51	56.8

2. Why choose a normative model?

First, the normative model works extremely well with a continuous improvement model. The goal for all schools is the Overall Score of 100, but the intent of the model is to create incentives for all schools to move toward 100. It also allows for more realistic goals for all schools. The AMO goal is to move one full standard deviation over a five-year period for the lower-achieving schools. The goals will be seen as achievable because the goals come from Kentucky schools obtaining those scores.

Second, the new Overall Score contains so many data points (achievement, gap, growth, college readiness, graduation rate, Program Reviews and teacher/leader evaluation) that it is difficult to imagine how a criterion-referenced cut score could be obtained. Not only are there many indicators, but each indicator contains multiple data.

3. Is moving one standard deviation in five years significant?

Yes. If all schools move one standard deviation in five years, the average of all schools significantly rises and pushes the average score for all schools closer to 100. At the end of five years, the averages and standard deviations are recomputed, and continuous improvement moves forward on the march to the score of 100.

By achieving a growth of a full standard deviation, schools below the state mean catch the state mean in five years. This is tremendous growth for those schools. For instance, it would mean a school scoring at the 16th percentile would reach the 50th percentile in five years. Once these schools catch the average in five years, a new distribution is run, and those schools would then have a new five-year improvement goal to move them forward.

4. Is moving one standard deviation in five years doable?

Early simulations of this model indicate the 1/5 of a standard deviation may be achievable for schools. A normative model uses relative standing between schools for the initial classification. Kentucky has a 20-year trend history of approximately 3-4 percent growth per year for schools. This pattern of growth provides some historical evidence that meeting the goal can be achieved. This will not be confirmed until we see the new data and how it performs, but the goals for schools below the mean seem doable since many other schools in Kentucky have proven they can reach a higher plateau. Kentucky will continually monitor the system to determine any adjustments that need to be made.

5. Why reset the goal every five years?

A normative model uses relative standing between schools for the initial classification. If a one-year distribution is used, that distribution changes every year, and schools have a moving target that is dependent on how other schools perform. By locking the goal for five years, targets become stable. The performance of other schools does not affect the school/district improvement goal or the ability to reach the goal. By locking the goal for five years the normative model gains criterion features. At the end of five years, the goal is re-set with a new distribution, but once again the goal is locked for another five-year period. This model provides for continuous improvement over time.

6. Why choose the 70th percentile for the proficient line?

The 70th percentile allows approximately 1/3 of the top-scoring schools to be chosen as Proficient Schools. This cut point sets a high bar of performance. Many stakeholders and the public have previously-formed perceptions of percentiles and their link to grades. The 70th percentile allows them to correlate the scores with traditional grading.

7. In Kentucky's model, what is the difference between Annual Measurable Objective (AMO) and Adequate Yearly Progress (AYP)?

Each school will receive a single AMO goal each year. By making the AMO goal, the school has successfully achieved AYP. AMO and AYP are synonymous terms in the Kentucky model.

8. Will there be a research effort to monitor and evaluate the system?

Yes. Kentucky acknowledges this system is new, and it does not have operational data based on the new assessments and metrics. Over the last 18 months, numerous questions have been discussed. We have run simulation data, and it appears the model will work; however, there are a number of research questions that need to be asked over the next few years. Kentucky will conduct annual reality checks to evaluate how the model is working. The evaluation will allow for constant monitoring and adjustments to fix procedures or problems that arise. Some of these research questions are listed below.

- Will the new Student Gap Group work as intended to make achievement of all students a top priority?
- Will the combination of many metrics into one single Overall Score work as intended?
- Is the goal of growing 1/5 of a standard deviation each year too easy, too hard or at the right spot?
- Does the normative model provide the incentives to increase student achievement?

2.C REWARD SCHOOLS

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

Guidance Question: Did the SEA describe its methodology for identifying the highest-performing and high-progress schools as reward schools?

There will be two types of Reward Schools: Highest-Performing and High-Progress.

Highest-Performing Schools

Within the category of Highest-Performing Schools, there will be two levels of schools: Highest-Performing with High Distinction and Highest-Performing.

- Kentucky Schools or Districts of Distinction will include Kentucky's Highest-Performing Schools or Districts that score at the 95th percentile or higher on the Overall Score and have received school or district accreditation.
- Kentucky Highest-Performing Schools or Districts will include schools/districts scoring at the 90th percentile or higher.

Schools will not qualify as Highest-Performing if they have been identified as Kentucky Priority or Kentucky Focus Schools.

Method for Highest-Performing Schools - Both categories will be calculated using the Overall Score by level. The Overall Score will be ranked annually from low to high. By level, the scores will be computed to determine both the Schools of Distinction and the Highest-Performing Schools for that year per the criteria cited above.

High-Progress Schools

Schools showing the highest progress will be labeled High-Progress Schools. High-Progress Schools will begin to be identified in Year 2 of the model in order to have two years of data to show improvement.

Method for High-Progress Schools - The Overall Score from Year 1 will be compared to the Overall Score of Year 2. The difference between those two scores will then be rank-ordered from top to bottom. Title I schools in the top 10 percent will be called High-Progress Schools. The top 10 percent of non-Title I schools also will be identified.

Priority and Focus Schools may be identified as High-Progress if they meet the eligibility requirements.

AMO and Graduation Rate Requirement for Highest-Performing and High-Progress Schools

Additionally, Highest-Performing and High-Progress Schools must meet their current-year AMO/AYP goal, and each high school's graduation goal must be above 60 percent for the

prior two years.

Progressing Category

In addition, any school that meets its annual AMO/AYP goal will be called a Progressing School. Progressing labels will be applied starting in the second year of the model because the calculation is dependent on two years' worth of data.

Needs Improvement Category

The Needs Improvement category includes all schools below the Proficient line that do not meet AMO/AYP goals.

2.C.ii Provide the SEA's list of reward schools in Table 2. **(See Attachment 9, page 80 of the Appendix)**.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Guidance Question: Did the SEA describe how the SEA will publicly recognize, and if possible, reward highest performing and high-progress schools?

703 KAR 5:220, Categories for Recognition, Support and Consequences is the regulation that will describe the rewards or recognition schools and districts are eligible to receive. It was originally approved by the Kentucky Board of Education in August 2011; however, it is undergoing revisions to align the regulation with the ESEA waiver requirements and secure additional constituent review and will come back to the board in either December 2011 or February 2012 for final consideration.

The elements for rewards and recognition will be as follows:

> "Each recognized school or district shall be authorized to use a KDE-approved web logo and other promotional materials as may be designated by KDE reflecting the category of recognition earned. Subject to availability of funds, financial rewards may be used in conjunction with other recognition activities, including funding for special professional growth opportunities or support to enable recognized schools or districts to partner with and mentor a lower-performing school or district. Kentucky Highest-Performing Schools and Districts of Distinction shall receive special recognition as determined by the Commissioner."

The Kentucky Department of Education has received substantial input from stakeholders into the design of the recognition and rewards processes outlined in the regulation. Throughout the developmental process, educators, administrators and other stakeholders were specifically asked to consider the question of how the rewards could be the most meaningful for schools and districts, and they were asked to provide their suggestions for rewards and recognition to

be included in the regulation. Considerable discussion ensued around whether the rewards section of the regulation should be more or less specific. The original version of the regulation included a reference to specific types/colors of flags that would be provided to schools at different recognition points. After discussion, it was determined that stakeholders preferred a less specific and more general approach, which would allow sufficient flexibility to adjust the rewards as additional ideas came forward from the field.

As Kentucky moves forward with implementation of the recognition and rewards processes outlined in the accountability regulation, staff will continue to collect and analyze data and obtain the input of teachers, principals, administrators and other stakeholders to assess the relative effectiveness of various types of recognition and rewards practices. The Kentucky Department of Education will continue to work with stakeholders to develop and refine rewards and recognition practices that will be meaningful to staff, while also identifying, magnifying and incentivizing the desired results.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

Guidance Question: Did the SEA describe its methodology for identifying a number of lowest performing schools equal to at least five percent of the State's Title I schools as Priority Schools?

Kentucky Priority Schools will include all the schools identified as persistently low-achieving (PLA), as defined by Kentucky Revised Statute 160.346.

Districts that have an Overall Score in the bottom 5 percent for all districts that have failed to make AYP for the last three consecutive years shall be Priority Districts. (2.D.iii.c)

2.D.ii Provide the SEA's list of priority schools in Table 2. **(See Attachment 9 on page 80 of the Appendix.)**

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

Guidance Question: Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in Priority Schools?

<u>Priority Schools</u>

Since Priority Schools are defined as those schools already identified as persistently low-achieving (PLA) by state statute, those schools have or will already receive supports and

consequences as required by KRS 160.346 (http://www.lrc.ky.gov/KRS/160-00/346.PDF) and 703 KAR 5:180 (http://www.lrc.ky.gov/kar/703/005/180.htm). Among those requirements is the necessity to choose one of the four school intervention options-- external management, restaffing (turnaround), school closure or transformation. Each of those options contains the relevant elements of the turnaround principles included in the 1003(g) School Improvement Grant guidance. Included among those elements is removal of the current school leadership unless the commissioner determines otherwise based on findings in the required leadership assessment. (2.D.iii.a)

Kentucky has an extensive, successful and highly regarded process by which it identifies and intervenes in Priority Schools and Districts. Upon identification as a Priority School through the assessment scores, the school and its district are required to undergo a Leadership Assessment to determine whether the leadership of the school/district has the capacity to lead the intervention process. As Kentucky's method of school governance includes a school-based decision making council, a determination is also made as to whether the council has the capacity to continue in its governance role or whether its authority should be delegated elsewhere. This examination of school governance to evaluate effectiveness in accelerating student learning is an innovative component of the model.

The intervention process is managed through the Kentucky Department of Education's (KDE's) Office of District 180. The office has established three Centers for Learning Excellence, which are staffed with Education Recovery staff that are highly trained and have extensive experience in turnarounds of low-achieving schools. The centers are affiliated with regional universities in the eastern, western and central parts of the state, which allow them to access university faculty and educational cooperative staff that serve those areas. Priority Schools are assigned to the supervision of a center, which is managed by an Education Recovery Director responsible for the oversight of all identified schools and districts in the geographic area. Each school is assigned an Education Recovery Leader, who becomes the lead administrator working with the principal to implement the recovery. Education Recovery Specialists are hired to work specifically with teachers to assist them in building the skills and capacities to dramatically improve student achievement.

The Education Recovery staff begins by putting in place a number of strategies to assure that interventions are begun as quickly as possible. Once the application for School Improvement Grant funds has been approved, training begins immediately with the provision of professional development on the turnaround process for all school personnel. Recovery staff facilitates a short term, 30-60-90-day planning process to determine and prioritize activities that must be accomplished immediately. While this is taking place, capacity building begins with targeted professional development based on needs identified from the Leadership Assessment. Teacher Turnaround Teams are formed by content area, with university faculty, experienced consultants from educational cooperatives, staff from the district central office, Education Recovery staff and KDE staff designing and delivering professional development and working with the Teacher Turnaround Teams. The teams work on problems of practice and methods for facilitating successful professional learning communities.

One of the factors contributing to the success of the District 180 Education Recovery process is

that it provides a consistent, proven framework for allocating human capital and fiscal resources to troubled schools, while allowing maximum flexibility for the intervention staff to personalize the methodologies based on the needs of the school, continually revisit and update their data and on that basis, immediately revise or abandon practices failing to generate the desired results.

In addition to the immediate interventions outlined above, Priority Schools make additional, longer-term plans through the Comprehensive School Improvement Plan (CSIP) process. In working through this planning process, the district will assist the school in using a variety of relevant sources, including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for revisions to the CSIP. The school also must document meaningful family and community involvement in selecting the intervention strategies that will be included in the revised CSIP.

The school's CSIP is required to include the support that the district will provide throughout this process. KDE's commitment to building district capacity is essential for the meeting of desired outcomes in these schools.

Consistent with requirements for all schools in each support category, the CSIP of a Priority School must contain a number of common elements:

- curriculum alignment to ensure the instructional program is rigorous, research-based, based on student needs and aligned with the Common Core Standards
- provision of time for collaboration on the use of data to inform assessment strategies, monitor and modify instruction, and support proficient student work
- professional development to address the goals of the plan
- parental and community communication and engagement
- attendance improvement and dropout prevention
- activities to target the underperforming areas in achievement, gap, growth, college/career readiness and gap.
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation measures
- school safety, discipline and non-academic factors such as student social, emotional and health needs
- design of the school day/week/year to maximize teacher collaboration and student learning time
- technical assistance that will be accessed

If identified for a second time, in addition to following the process above, the CSIP will be submitted to KDE for review and approval and posted on the school's website. If identified for the third or more consecutive time, the school must:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by KDE, accept the assignment of a mentor/partner
- accept ongoing resources throughout the year as assigned or approved by KDE

Priority Districts

The district also will be required to revise its Comprehensive District Improvement Plan (CDIP) using a variety of relevant sources including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for the revisions. The CDIP will be posted to the district's website, include the support to be provided to the school(s) and address the following:

- curriculum alignment within the schools, assuring there is alignment with the common core standards
- evaluation and assessment strategies to continuously monitor and modify instruction to meet student needs and support proficient student work
- professional development to address the goals of the plan
- parental and community communication and engagement
- attendance improvement and dropout prevention strategies
- activities to target the underperforming areas in achievement, gap, growth, college/career readiness and gap
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation measures
- technical assistance that will be accessed

The district's CDIP is required to include the support that the district will provide throughout this process.

If identified for a second time, in addition to the items described above, the CDIP will be submitted to the KDE for review and approval and posted on the district's website. If identified for the third or more consecutive time, the district must:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by the KDE, accept the assignment of a mentor/partner
- accept ongoing resources throughout the year as assigned or approved by KDE

KDE will monitor implementation of the plan and provide guidance based on progress reports, data reviews and on-site observations.

Schools and districts will be provided with examples of interventions that they may wish to choose from to address the required components in the CSIP/CDIP. Some examples of the required CSIP/CDIP components and suggested interventions are:

1. **Redesigning the school month, day or year to include additional time for student learning and teacher collaboration:**
    - This may include adding time to the school day, adding days to the school year, changing the master schedule to look for additional time, changing the school calendar to provide additional time, reducing transition time to classes, reviewing the school schedule to look for additional sources of time that might be found.

2. **Using data for continuous improvement in teaching and learning:**
    - Must at a minimum provide time for collaboration on the use of data; use professional learning communities to review specific data; review a multiplicity of types of data to examine the impact of each on student achievement (teacher and student attendance, truancy, student discipline infractions, positive behavior interventions); provide faculty-wide input to determine data interests/needs; provide for faculty-wide review of data to determine areas needing further professional development; examine formative or interim assessments for the purpose of improving instruction; and disaggregate data by subgroups to assist in determining appropriate targeted interventions.

3. **Ongoing mechanisms for family and community engagement:**
    - Establish organized parent groups; hold public meetings to review school performance and assist with developing the CSIP; use parent, teacher and student surveys to determine areas of strength and weakness; continue use of Family Resource/Youth Services Centers (FRYSCs) and other local support providers to help meet student and family needs; continue to use the School-Based Decision Making (SBDM) process for engaging parents in the activities of the school; work with adult education providers to offer parent education classes; and collaborate with parent groups representing students with disabilities, students with Limited English Proficiency and other gap groups to receive their input and ascertain the needs for individual students.

4. **Establishing a school environment that improves safety and discipline and addressing other non-academic factors that impact student achievement such as students' social, emotional and health needs:**
    - Hiring a school resource officer; initiating programs such as a Positive Behavior Intervention System or other systems designed to limit negative student behaviors; introducing a school-wide anti-bullying program; receiving an audit from the Center for School Safety and implementing the recommendations from it; beginning collection and analysis of data on a number of the non-academic factors that impact student achievement; using information from the Kentucky System of Interventions to address school environment concerns; and continuing use of the FRYSCs and other local providers to help meet broader student and family needs.

The implementation of the variety of practices to be implemented to address the needs of Priority Schools and Districts will increase the quality of instruction to all students, improve the effectiveness of leadership and teaching in those schools, decrease achievement gaps and improve student achievement for all groups of students. (2.D.iii.b)

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

Guidance Question: Is the SEA's proposed timeline for ensuring that LEAs that have one or more Priority Schools implement meaningful interventions aligned with the turnaround principles in each Priority School no later than the 2014-15 school year reasonable and likely to result in implementation of the interventions in these schools?

Kentucky has identified as Priority Schools those previously identified as persistently lowest-achieving Schools (PLAs) using the 2009, 2010 and 2011 assessment data. The Priority Schools, due to their previous identification as PLAS, have already been implementing interventions required through School Improvement Grants (SIGs), which are aligned with the turnaround principles. Since the Priority Schools are identified by the state statute defining PLAs (KRS 160.346), the Kentucky Department of Education (KDE) has already begun the process to implement meaningful interventions in schools identified with 2009 and 2010 assessment data and will begin over the next few months to provide the same interventions with those identified with 2011 assessment data. KDE will implement the additional requirements of this waiver request upon U.S. Department of Education approval. The rationale behind the choice of these implementation timelines is to assure that intervention processes to benefit students are put in place as soon as possible.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

Guidance Question: Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

In order to exit the Priority status, the school or district must meet AMO/AYP goals for three consecutive years and must no longer be identified by the applicable percent calculation of being in the lowest 5 percent. This exit goal is the reverse of the calculation that moved the school into the Priority category. By meeting the AMO as described in section 2.D.i. above, the school has made a gain of 60 percent of the standard deviation goal. By moving that far in a three-year period, the school has shown it has made progress and is improving. In addition, the school needs to score at or above a 59 percent graduation rate for three years in a row. (2.D.iii.c.)

The process is designed to provide a trajectory of continuous improvement for all schools and districts; thus, schools and districts exit their current rewards and consequences status and enter another category when they no longer meet the eligibility criteria for the original category.

2.E FOCUS SCHOOLS

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

Guidance Question: Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as focus schools?

Focus Schools:

The student gap group score, described in Section 2A, will be used to determine the Focus Schools. There will be three ways to become a Focus School:

(1) The Student Gap Group Score will be ranked for all schools in the state. The schools in the lowest 10 percent of the student group gap scores by level will be called Focus Schools if they also have missed AYP for the past two years. The list will identify the lowest 10 percent of all schools in the state. All schools, both Title I and non-Title I, can be Focus Schools. (If necessary, the list would be increased until at least 10 percent of the Title I schools are included as Focus Schools.)

OR

(2) Kentucky recognizes the importance of individual gap groups; therefore, individual group data is not lost in the model. All schools with individual gap groups underperforming in the third standard deviation below the mean (called Third Standard Deviation Model) will be called Focus Schools. The calculation is done by comparing each individual gap group to the average of all students in the state. In practical terms, this calculation can be considered an AMO goal for each subgroup in a school.

OR

(3) Any high school with a graduation rate below 60 percent for two years in a row will be a Focus School.

Method for Calculating Focus Schools: Third Standard Deviation Model

By level, (elementary, middle and high), the state average for proficient/distinguished in each subject area (reading, mathematics, science, social studies and writing) will be computed. In addition, a standard deviation by subject area for all students will be computed. For each subject area, the third standard deviation below the mean of all students will be the cut score to determine if an individual subgroup becomes a Focus Group. If an individual subgroup by level and subject falls below the third standard deviation cut score, that subgroup will place the school into the Focus School category. Across the level, the subgroup needs at least 25 students.

Focus Districts:

Districts that have a Student Achievement Gap Group Score in the bottom 10 percent of Student Gap Group Scores for all districts will be identified as Focus Districts.

Key Questions and Answers

1. Has Kentucky gone beyond the minimum requirements for Focus Schools?

Yes. By adding a Third Standard Deviation Model, there is, in practicality, another AMO goal around individual gap groups. The Third Standard Deviation Model allows Kentucky to locate individual subgroups across all schools in each subject area that need to be targeted for improvement.

2. Does the model catch low-performing subgroups in high-performing schools?

Yes. A Third Standard Deviation Model calls for locating individual underperforming subgroups in all schools. The Third Standard Deviation Model looks for individual subgroups that are underperforming compared to the average of the "all" students group by at least three standard deviations. This means any individual subgroup in any high-, middle- or low-performing school may be targeted as a Focus School for interventions. In simulations run with current Kentucky assessment data, 364 of all schools would be listed as Focus Schools due to the Third Standard Deviation Model.

2.E.ii Provide the SEA's list of focus schools in Table 2. **(See Attachment 9, page 80 of the Appendix.)**

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Guidance Question: Did the SEA describe the process and timeline it will use to ensure that each LEA identifies the needs of its Focus Schools and their students and provide examples of and justifications for the interventions the SEA will require its Focus Schools to implement to improve the performance of students who are furthest behind?

Overview of Determining Focus School Needs

Kentucky's accountability system will ensure that school districts identify the specific needs of their Focus Schools and their students, and furthermore, that they will take appropriate steps to intervene to improve the performance of students who are the farthest behind.

A central tenet of Kentucky's support and monitoring activities for all of its schools and

districts centers on the Comprehensive School/District Improvement Planning process. Comprehensive School/District Improvement Plans (CS/DIP) are developed through a process that is described in greater detail in 2.F., Incentives and Supports for Other Title I Schools. The Improvement Plans for Focus and Priority Schools/Districts differ from those required of the remainder of Kentucky's schools/districts, in that they require the plans to include additional requirements (outlined specifically below) related to their gap issues and to address how they will address these additional requirements.

To ensure the local education agency (LEA) is involved in identifying the needs of its Focus Schools, and ensuring that it implements appropriate, timely and effective interventions, Kentucky requires activities of both the Focus School and its district. The district is required to assist the school throughout the needs assessment process using data from a variety of sources and to work with the school throughout the development of the plan. The Kentucky Department of Education (KDE) regularly convenes a statewide Raising Achievement/Closing Gaps Council that has developed a guidance document that schools and districts must use to inform the direction of their plans, and the council remains available to provide additional, evolving resources in this area as these develop.

As a result of this collaborative effort, the school's plan will include the support to be provided by the district, and the district will review the completed plan to assure that the resources to implement the plan are available. Plans are to be posted on the school's website to ensure widespread dissemination and promote transparency throughout the process.

The extensive education recovery work of the Office of District 180 with Priority Schools will provide research-based interventions and resources that may be accessed by Focus Schools and Districts based on the needs identified through the planning process. As a part of the monitoring process, the plans of Focus Schools will be monitored by cross-functional teams of KDE staff who will review submissions, assess levels of implementation and recommend new or revised interventions as needed.

The framework requires the early and continued involvement of LEAs in working with their Focus Schools. LEAs are expected to be primarily responsible for the compliance of their schools, with additional, more intensive oversight by KDE coming into play when and if the strategies outlined in the comprehensive plan do not appear to be achieving sufficient gap closure to allow the school to exit from the Focus category within a two-year timeline.

<u>Process – Focus Schools</u>

The initial step in the accountability process is notification by the commissioner of education of a school's status as a Focus School. Within 90 days, each identified Focus School must review and revise their Comprehensive School Improvement Plan (CSIP) and post it on the appropriate website. The revisions require the use of a variety of relevant sources, including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for the revisions. The needs assessment and the revised plan will be informed by guidance from the Commissioner's Raising Achievement/Closing Gaps Council (CRACGC).

CSIPs for Focus Schools must contain:

- curriculum alignment to ensure the instructional program is rigorous, research-based, based on student needs and aligned with the Common Core Standards
- provision of time for collaboration on the use of data to inform assessment strategies, monitor and modify instruction, and support proficient student work
- specific strategies to address the within-school gaps in achievement and/or graduation rates between the highest-achieving subgroup and the lowest-achieving subgroup
- professional development on the goals of the plan
- parent and community engagement
- attendance improvement/dropout prevention strategies
- activities to target the underperforming areas in achievement, gap, growth, college/career readiness and gap
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation
- school safety, discipline and non-academic factors such as student social, emotional and health needs
- design of the school day to maximize learning time
- technical assistance that will be accessed

If Focus Schools remain in that category and do not meet the definition of a High-Progress School for three consecutive compilations of an Overall Score, they must revise the CSIP to meet the requirements for Kentucky Priority Schools, submit it for approval by the Kentucky Department of Education (KDE) and post it on the appropriate website. If this occurs for a fourth time, they must, in addition to the above:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by the KDE, accept the assignment of a mentor/partner
- accept ongoing resources through the year as assigned or approved by KDE

Process – Focus Districts

The initial step in the accountability process is notification by the commissioner of education of district's status as a Focus District. Within 90 days, each identified Focus District must review and revise their CDIP and post it on the appropriate website. The revisions require the use of a variety of relevant sources, including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for the revisions. The needs assessment and the revised plan will be informed by guidance from CRACGC. The CDIP will be posted to the district website, include the support to be provided to the school(s), and address the following:

- curriculum alignment within the schools; assuring there is alignment with the Common Core Academic standards
- evaluation and assessment strategies to continuously monitor and modify instruction to meet student needs and support proficient student work
- specific strategies to address gaps in achievement and graduation rates between the highest-achieving student performance group and the lowest-achieving student performance group(s)

- professional development to address the goals of the plan
- parental and community communication and engagement
- attendance improvement and dropout prevention
- activities to target the underperforming areas in achievement, gap, growth, college/career readiness and gap
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation measures
- technical assistance that will be accessed

The district's CDIP is required to include the support that the district will provide throughout this process.

If Focus Districts remain in that category and do not meet the definition of a High-Progress District for three consecutive compilations of the Overall Score, they must revise the CDIP to meet the requirements for Kentucky Priority Districts, submit it for approval by the KDE and post it on the appropriate website. If this occurs for a fourth time, they must, in addition to the above:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by the KDE, accept the assignment of a mentor/partner
- accept ongoing resources through the year as assigned or approved by KDE

Timelines

Kentucky will provide a tentative identification of Focus Schools/Districts based on the results from the 2010 and 2011 assessment scores. Full implementation of the model will occur with the identification of schools following the administration of the 2011-12 assessment.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

Guidance Question: Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

Focus Schools - 10% Model: In order to exit the Focus Schools category in the 10 percent model, the student gap group would need to be above the lowest 10 percent category and meet AMO/AYP for two years in a row. By moving the groups out of the lowest-performing gap groups, the school has demonstrated an intentional focus on and success with improving the achievement of the gap group students.

Focus Schools – Third Standard Deviation Model: In order to exit the Focus Schools category in the Third Standard Deviation model, the individual subgroup that triggered the school's placement in the category would need to rise above the third standard deviation cut

score, and the school would need to meet AMO/AYP for two years in a row.

Focus Schools – Graduation Rate: If the school is a Focus School due to graduation rate, the school must have a graduation rate higher than 60 percent and meet AYP for two years in a row to exit this status.

Focus Districts also would need to be above the lowest 10 percent category to exit this status.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY AND FOCUS SCHOOLS -- SEE ATTACHMENT 9, PAGE 80 OF THE APPENDIX FOR KENTUCKY'S LIST OF SCHOOLS.

Requested Totals for Table 2 – All Schools and Title I Schools

Level	Number of Schools	Title I Schools	All Schools - Reward	Title I Schools - Reward	All Schools - Priority	All Schools - Focus	Title I Schools - Focus	Title I Schools w/Graduation Rate <60%
Elementary	712	639	125	103	0	214	192	n/a
Middle	320	227	56	40	9	125	72	n/a
High	224	60	34	9	32	70	14	3
All Levels	1,256	926	215	152	41	409	278	3

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE 1 SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Guidance Question: Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

Kentucky's accountability system is designed to identify and support those schools and districts that are struggling, reward those schools/districts that have proven their ability to improve student achievement and provide support for both Title I and non-Title I schools that are not identified in either category.

As mentioned earlier, Kentucky's support and monitoring activities for all schools and districts center around the development, revision and monitoring of the Comprehensive School Improvement Plan (CSIP) or Comprehensive District Improvement Plan (CDIP). Schools that have been identified as Focus or Priority Schools/Districts have specific process and content requirements for development of the CSIP/CDIP relative to their status. All other schools and districts are required to complete a plan, but the requirements are not as prescriptive as those for the Focus Schools and Districts.

To explain in more detail, the CSIP/CDIP process requires a needs assessment to be completed that includes parents, students and community involvement in the development process. Committees analyze data related to the nine Standards and Indicators for School Improvement, which are also the basis for the Leadership Assessment process used to identify School Improvement Grant (SIG) schools. (See the following link for the Standards and Indicators for School Improvement: http://www.education.ky.gov/KDE/Administrative+Resources/School+Improvement/Standards+and+Indicators+for+School+Improvement.)

The committees use the data to determine the school's or district's needs. That data is synthesized into causes and contributing factors, translated into needs and then prioritized. Goals, objectives, strategies and activities are developed to address the priority needs. The strategies and activities to address the goals must be research-based, proven to be effective or noted as instructional best practices. Each strategy receives a person responsible, timeline and funding source. The process requires a review of the previous year's plan to evaluate its effectiveness, which is used to inform the development process for the new plan and includes a plan for ongoing public communication.

In an attempt to decrease the time and paperwork burden on local schools and districts, Kentucky decided to work with a vendor to provide an automated process for development and submission of the plans. The selected vendor chosen as a partner in this venture is AdvancEd, which administers the Southern Association of Colleges and Schools (SACS) accreditation and is recognized across the world as the leading organization for school and district improvement and accreditation.

Through the use of AdvancEd's ASSIST (Adaptive System of School Improvement Support Tools) the Kentucky Department of Education (KDE) intends to reduce the number of plans required of schools and districts, better align the state's data collection and practices with those of the U.S. Department of Education and ensure the use of a more comprehensive plan allowing districts to track resources used and results realized from implementation of electronic plans. It will provide schools and districts with a template for their plans, the ability to upload additional compliance data and a method for monitoring completion of school and district strategies in the plan.

An additional benefit of this collaboration is the development of an electronic state education agency monitoring process that will flow from the school and district planning processes. The online tools allow school districts to upload a number of compliance documents, send them electronically to KDE and receive feedback. It provides the state education agency a centralized location for all monitoring documents and activities, and it is anticipated that ASSIST will reduce or eliminate some monitoring activities that had in the past been performed on-site.

To further assist KDE in supporting these schools and districts, cross-functional teams with representation from all areas of the agency will be assigned to review the submissions from all school districts and assess weaknesses that could become obstacles to successful completion of the plans. The teams will assess levels of implementation and recommend appropriate and targeted interventions specifically designed to address the identified concerns.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

Guidance Question: Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?

The Kentucky Department of Education's (KDE's) monitoring and accountability process was specifically designed to build capacity at the state and local levels and to ensure that, following an intervention process, schools and districts would have a greater understanding of the organization and practices necessary to run a successful school centered around student achievement. As previously discussed, the foundation of the process is the work of the department's Office of District 180 and the intensive intervention strategies the office will employ with the Priority Schools and Districts to radically improve struggling schools. This process was originally developed to meet the requirements from the U.S. Department of Education for addressing the needs of persistently lowest-achieving schools and has been successfully implemented for the previous two years on those schools. Based on analysis of this year's statewide assessment results from participating schools, the process has been extremely successful in increasing student performance and improving the schools' capacity. Staff monitoring Focus Schools and other non-rewards schools will have the ability to access the information and resources used with these schools in order to build capacity with the schools and districts under their purview.

The improvement process in Focus Schools with its requirement for gap-specific targeted planning and implementation also is designed to make sure that capacity is built at both the district and school levels. The plan development, resources available through the electronic planning and monitoring ASSIST (Adaptive System of School Improvement Support Tools) tools and interaction with the KDE cross-functional, cross-agency teams accessing District 180 resources will work together to ensure that successful practices are learned and incorporated into the ongoing work of the school and district. Equity and gap closure is a core value in Kentucky's reform agenda and is evidenced throughout this waiver request.

KDE plans to take advantage of all opportunities available to consolidate and target federal funding sources to assure sufficient support can be provided to successfully implement the interventions outlined in this application.

<u>Priority Schools</u>

The Office of District 180 provides educational recovery services that focus on the Priority Schools and Districts identified for school improvement to provide supports and raise expectations for students in the lowest-achieving schools and allow more of these students to graduate college- and career-ready. Three locally-based Centers for Learning Excellence (CLE) are located in Kentucky universities in the east, west, and central parts of the state, and each identified school/district will be assigned to a center. The CLEs are staffed by an Education Recovery Director (ERD), who manages the process in all the assigned schools and districts in his/her region and serves as a liaison with KDE, the appropriate regional education cooperatives and the center. An Education Recovery Leader (ERL) is assigned to each school

and becomes the lead administrator in the school. Both ERDs and ERLs are identified from a pool of applicants who have experience in leading schools to improve achievement and closing achievement gaps. Along with these staff, Education Recovery Specialists (ERS), who specialize in working with teachers to make dramatic improvement in instructional practice that leads to improved student learning, are assigned to each school. The centers coordinate the support being provided to these Priority Schools/Districts.

Once a school/district has been identified, intervention efforts begin with their assignment to a CLE and the assignment of Education Recovery staff. Once the content of their application for School Improvement Grant (SIG) funding has been approved, specific school improvement training is provided to all staff to begin the process. The planning process, which is facilitated by the Education Recovery staff, identifies areas in need of additional attention. Capacity building begins with the delivery of targeted professional development, including the use of Teacher Turnaround Teams, a collaborative effort with representatives from KDE, the CLE and the school). These schools are required to have short-term 30-, 60- and 90-day plans and have access to the planning and monitoring component of ASSIST. These initial plans address the immediate activities that will occur and the expenditure of school improvement funds to support the activities.

Kentucky is fortunate in having extensive experience in identifying and successfully intervening in low-achieving schools and districts. For approximately 20 years, Kentucky has had an accountability mandate by virtue of state law and a requirement to identify and further train the most skilled educators in the state. Therefore, cadres of highly-trained, experienced individuals who are knowledgeable about the elements that make a school successful are continually available. Research-based strategies and activities, proven practices and extensive resources have been collected and maintained. The implementation work of the Office of District 180 provides a framework for addressing the needs of other low-achieving schools and the District 180 in-house and contract staff serve as advisors and resources to other Frankfort-based staff working with Priority Schools/Districts and other low-achieving schools and districts.

<u>Focus, Progressing and Needs Improvement Schools/Districts</u>

The Focus, Progressing and Needs Improvement Schools or Districts will be monitored by specifically assigned KDE staff as they oversee the revision and implementation of the improvement plans. Staff will review the submissions from these school/districts and assess weaknesses that could become obstacles to successful completion of the plans. Staff will assess levels of implementation and recommend appropriate and targeted interventions specifically designed to address the identified concerns.

Comprehensive District Improvement Plan (CDIP) and Comprehensive School Improvement Plan (CSIP) monitoring and technical assistance for these schools and districts will be through the cross-agency, cross-functional department team to which the schools/districts have been assigned. The teams have representation from all areas of the agency and are expected to establish ongoing relationships with the districts/schools they monitor. Through that process, the team will be better equipped to identify areas in need of assistance and work with

schools/districts to locate appropriate resources and support.

Holding School Districts Accountable

In addition to the above monitoring requirements, KDE will have a requirement to review and approve all submissions as part of 703 KAR 5:220 (under revision to incorporate ESEA waiver requirements and secure constituent review), to monitor implementation of district plans and provide necessary guidance based on information gathered from sources including, but not limited to, progress reports from the district, data reviews and on-site observations. State and local accountability is outlined in this proposal and while KDE holds districts accountable, there also is a clear expectation for districts to hold their schools accountable. Hence, school districts are expected to be primarily responsible for the compliance of their schools.

The automated ASSIST system provides the state agency with monitoring capacity arising out of the school and district planning processes. It will allow school districts to upload a number of compliance documents, send them electronically to KDE and receive feedback. It will provide the state agency with a centralized location for all monitoring documents and activities and should reduce the number and frequency of on-site visits required. The purpose for implementation of ASSIST was to make school district reporting requirements less burdensome on schools/districts and to streamline and make state agency monitoring efforts more efficient.

Sources of Funding

KDE plans to take advantage of the financial flexibility allowed through the waiver to most effectively support implementation of the interventions in the lowest-achieving schools. Additional review will be necessary to determine the most efficient balance of these allocations. Any additional funds generated based on such a reallocation may be offered to the lowest-achieving schools on a competitive basis.

Quality of Vendors

Questions have arisen regarding the means by which states assure that external staff hired to assist with implementation work are of sufficient quality and experience. Kentucky has a number of protections designed to ensure that this is occurring. First, the state must abide by bid law requirements. Under these laws, procurements involving technical or complex requirements are bid competitively through negotiations or by formal Request for Proposal (RFP). Both require a formal bid process through an open solicitation and an award made consistent with requirements of the Model Procurement Code. The RFP process allows program staff the ability to set specific qualifications and require specific evidence of those qualifications, such as curriculum vitae of the staff responsible for the work, previous work of a same or similar type that has been recently completed and lists of references that may be contacted. These are evaluated against the requirements listed in the RFP to determine the winning proposal. If no satisfactory candidate has applied, the agency is not required to select a proposal and can rebid the process, if desired.

In the past, Kentucky has directly hired a number of vendors with which low-achieving schools and districts may contract to receive services that are identified as necessary through the planning process. This is an additional means by which the state can control the quality of vendors available for selection. (2.G.a.i)

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

Option A	**Option B**	**Option C**
☒ If the SEA has not already developed any guidelines consistent with Principle 3, provide: i. the SEA's plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year; ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and iii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14).	☐ If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide: i. a copy of any guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); iii. the SEA's plan to develop and adopt the remaining guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year; iv. a description of the process used to involve teachers and principals in the development of the adopted guidelines and the process to continue their involvement in developing any remaining guidelines; and v. an assurance that the SEA will submit to the Department a	☐ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide: i. a copy of the guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); and iii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines.

Massachusetts

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Overview

The Commonwealth's schools and districts are currently assessed based on both the state's five-level Framework for District and School Accountability and the requirements of the No Child Left Behind Act (NCLB). Operating these dual systems at one time provided a wealth of valuable feedback, but the requirements under NCLB have declined into an administrative and fiscal burden that is no longer useful. The rising targets have resulted in far too many schools and districts being identified as in need of improvement to allow the state to best identify those most needing assistance or intervention.

In contrast, Massachusetts' existing state system has proven extremely valuable. Our system places schools and districts on a five-level scale, ranking the highest performing in Level 1 and lowest performing in Level 5. The strength of this accountability system is undergirded by the state's 2010 *Act Relative to the Achievement Gap*, which provides the tools, rules, and supports necessary for the state to aggressively engage with schools and districts in Levels 4 and 5.

Our proposal seeks to enhance the state system by establishing a new goal: to cut our state's proficiency gaps in half by 2017. We will also establish a new marker to identify schools and districts with the largest achievement gaps and will further differentiate interventions by accountability status. Taken together, these changes will allow us to support every school where students continue to struggle and create a system focused on college and career readiness that supports continuous improvement in every corner of the Commonwealth.

Goal and Annual Measurable Objectives

On October 25, 2011, the Massachusetts Board of Elementary and Secondary Education voted to adopt a revised goal for all districts, schools, and subgroups in the state: to **reduce the proficiency gap by half by 2017,** thus reducing by half the proportion of students who are not college and career ready. Meeting this goal will require all schools and districts to accelerate progress for all students, particularly those who are furthest behind. Through the hard work and dedication of their teachers and students, many Massachusetts schools and districts have

already halved their proficiency gaps over the past five years, proof that our goal is ambitious, yet achievable.

To measure progress toward that goal and classify schools in an accountability and assistance level, we are proposing to create a Progress and Performance Index (PPI) that combines a set of measures that include our current best indicators of progress towards college-and career-readiness: progress on gap-closing as measured by our state assessments in English language arts, mathematics, and science; performance at the *Advanced* and *Warning/Failing* levels; growth/improvement; and graduation and dropout rates for high schools. Targets will be differentiated for each district, school, and subgroup depending on its starting point in the baseline year, 2010–11, with the goal in each case to cut in half the proportion of students who are not on track to college and career readiness (performing at least at the *Proficient* level). As a result, districts, schools, and subgroups that are furthest behind are expected to make the strongest gains and thus close achievement gaps.

Massachusetts will continue to issue and report Annual Measurable Objective (AMO) determinations using PPI indicators for students in the aggregate, low income students, students with disabilities, English language learners, and the state's major racial and ethnic subgroups. We will also make determinations for a new "high needs" subgroup composed of students who are low income, have a disability, or are English language learners or former English language learners.

The high needs subgroup includes students falling into one or more of the following subgroups: student with disabilities, English language learners, former English language learners, and low income students. Many of our schools and subgroups do not meet our minimum N threshold of 40 students for issuing accountability determinations. By measuring progress and performance for the high needs student subgroup rather than considering each student demographic group individually, we are able to hold nearly 200 more schools accountable for subgroup proficiency gaps along with overall performance. At the same time, this still allows us to retain a focus on all students, including racial and ethnic minorities. In 2010-11, the high needs group included 82% of African-American students and 88% of Hispanic students statewide. In addition, using the high needs group for accountability determinations addresses a frequent stakeholder criticism of the AYP system in that it eliminates double-, triple-, or quadruple-counting individual students who may be classified in multiple subgroups.

Beyond the indicators described above, the PPI will also consider participation in the state English language arts, mathematics, science, and English language proficiency tests. It will include data for the four most recent years, with the most recent years weighted most heavily. Over time, as additional indicators of college and career readiness become available, we will expand and improve the index to include them. This index will allow us to better identify and describe schools and districts needing support across a spectrum of very strong to very weak performance. Additional details on our proposed AMO and PPI methodology appear in section 2.B.

Classification
We propose to classify schools as follows.

Level	Description
Level 1	On track to college and career readiness
Level 2	Off track from college and career readiness
Level 3	Focus: Lowest performing 20% of schools (including schools with the largest gaps)
Level 4	Priority: Lowest performing schools
Level 5	Priority: Chronically underperforming schools

We will also use four years of data to identify and recognize high achieving and/or greatly improving schools. These will be considered our state's Commendation, or Reward, schools. Commendation schools may be classified in Levels 1 or 2.

As described in more detail in sections 2.D.i and 2.E.i, the PPI for all students is the primary consideration in placing schools in Levels 4 and 5, while the PPIs for both all students and the high needs subgroup are factors in the placement in Levels 1, 2, and 3. Whether a school is on- or off-track for college and career readiness will determine if it is classified in Level 1 or 2.

We propose to classify districts at the level of their lowest performing school, in keeping with Massachusetts' current framework for district and school accountability and assistance. For example, a district with one or more Level 4 schools would be a Level 4 district, while a district whose lowest performing school is Level 2 would be a Level 2 district.

Support
The development of the state's framework for accountability and assistance was grounded in our belief in three core principles:

1. The district should be the entry point for the state's accountability and assistance work, not the school. The state's role should be focused on building district capacity to support and guide improvement efforts in individual schools.
2. A strong accountability system is not enough to ensure continued improvement. A parallel system of assistance and intervention is necessary to secure continued, strong improvement.
3. Every district does not need the same amount of support from the state. The depth of ESE's engagement with each district should be based on the severity of the problem.

These three principles informed our thinking in the development of this waiver proposal. We are committed to moving away from the "one size fits all" method required under NCLB and to tailor our assistance and support to meet the actual needs of our districts. Our system of

support for districts and schools seeks to clearly define the problem, what needs to be done immediately after classification on the framework, the range of activities that are permissible, and the scope and level of support that districts can anticipate from ESE.

Under our proposal districts will be required to reserve up to 25 percent of their Title I, Part A funds on a sliding scale to address identified needs. Districts will have the flexibility to scale their responses based on their unique needs, but ESE will improve its own fiscal accountability processes to monitor the quality and efficiency of district improvement efforts. Details are contained in Sections 2.D to 2.G.

Supports and interventions available to districts and schools will be available through a range of vehicles (professional development, online modules, professional learning communities, etc.) and will vary in scope to target particular areas that need strengthening. Massachusetts will no longer mandate NCLB school choice and supplemental educational services (SES) as currently required under NCLB. Supports and interventions will instead include: expanded learning opportunities for struggling students, which may include tutoring and other supports offered through strategic partnerships; professional development that is embedded, sustained, and connected to educators' needs; and other supports aligned to ESE's 11 Conditions for School Effectiveness, including those that address students' social-emotional needs and family-school engagement. Specific focus will be placed on the particular needs of students with disabilities and English language learners. Additional details about possible supports and interventions are in Sections 2.F. and 2.G.

Timeline

The results of the spring 2011 Massachusetts Comprehensive Assessment (MCAS) will serve as the baseline for establishing AMO targets for 2011–12 through 2016–17 for all districts, schools, and subgroups. We will publicly announce our initial AMO determinations under this flexibility in August 2012, comparing the 2012 results to the 2011 baseline. At that same time, we will use the Progress and Performance Index (PPI) to classify all schools and districts in the Commonwealth into Levels 1 through 5. Going forward, we will announce progress on AMOs and designations into accountability levels in the late summer each year based on the previous spring's test results.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☒ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and

	focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

Beyond English language arts and mathematics, ESE proposes to incorporate results from the state science assessment into the accountability framework. Students in Massachusetts public schools take science assessments in grades 5, 8, and high school and must pass the high school science assessment to receive a diploma; to date, however, these results have not been used in school or district accountability determinations. We intend to begin using science results in our accountability system to reinforce our commitment to college and career readiness and emphasize the growing importance of competency in science, technology, engineering and mathematics (STEM) in today's economy. This heightened focus on science performance will intensify the need for our public schools to continue to make science education a priority, in addition to English language arts and mathematics.

Schools and districts will be held accountable in the Progress and Performance Index (PPI) for their progress on closing proficiency gaps in science. We do not have student growth data for this assessment so will not include it in the growth/improvement portion of the PPI. Additional details on the role of science in the accountability system are in section 2.B. See Attachment 8 for state-level assessment data for science.

2.B Set Ambitious but Achievable Annual Measurable Objectives

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal	☐ Set AMOs that increase in	☒ Use another method that is

increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

The overarching goal of Massachusetts' proposed accountability system is to **reduce the proficiency gap by half by 2017**. This goal applies to the state and to all districts, schools, and subgroups. To measure progress toward the goal and classify schools in an accountability and assistance level, the Massachusetts Department of Elementary and Secondary Education (ESE) proposes to create a Progress and Performance Index (PPI) that combines four years of data on state testing participation, student achievement, student growth/improvement, and graduation and dropout rates to provide a more comprehensive and nuanced measurement of district and school progress toward college and career readiness. ESE will establish annual measurable objectives (AMOs) for each district, school, and subgroup using PPI indicators. The primary purpose of AMOs will be to provide transparent reporting of district and school progress toward college and career readiness for all students, and, in turn, to incentivize continuous improvement. The primary purpose of the PPI is to identify schools and districts most in need of assistance, and, accordingly, place schools and districts in our framework for accountability and assistance.

Our goal, reducing the proficiency gap by half by 2017, represents a refinement of Option A, equally as ambitious, and will help ensure all of our students are on a path towards college and career readiness. Evidence has shown that this goal also is achievable: Over the last six years, 16 percent of Massachusetts schools have halved their proficiency gaps in ELA, 19 percent in mathematics.

Our proposal assumes that scoring *Proficient* or higher on the Massachusetts Comprehensive Assessment System is a robust proxy for college readiness. Previous research[14] on Massachusetts high school graduates demonstrates that students scoring *Proficient* or higher on our grade 10 tests are substantially less likely to require remedial coursework in college. Specifically, the research shows that only 4 percent of students who score *Advanced* require remedial courses in public colleges and universities, and 25 percent of students who score *Proficient* but not *Advanced* need to enroll in a remedial course.

Throughout this section, we refer to measures based on MCAS, our existing state testing system. However, once the PARCC assessments are available we will reset our annual measurable objectives accordingly. In addition, beginning with the school year just completed (2010-11) our student-level data collection includes course completion and grades. We are also in the process of linking our PK-12 and higher education databases. As these data sets mature, we will be incorporating indicators of course-taking into our measure of college and career readiness. These will include successful course completion in the first year of high school (ninth grade success), completion of MassCore (the Commonwealth's college-ready course of study), and success in entry-level, credit-bearing courses in college.

The Progress and Performance Index: Measures

The Progress and Performance Index is a four-year, comprehensive indicator of district and school progress towards college and career readiness that incorporates the best measures of readiness available in Massachusetts today. As additional measures become available, and as our state moves to next generation assessments in 2014–15, we anticipate updating or expanding this index. For now, it includes four types of indicators: testing participation, student achievement, student growth/improvement, and high school graduation and dropout rates.

ESE will use the PPI to classify schools and districts in levels under the framework for accountability and assistance, while AMOs will serve as transparent reporting measures that inform the public and other stakeholders of the progress schools and districts are making toward college and career readiness for all students. Details are below.

1. Testing participation

Participation on state assessments will remain a primary anchor of the accountability system. As is the case presently under NCLB, all districts, schools, and subgroups will be expected to

[14] http://www.doe.mass.edu/research/reports/0208bhe.pdf

assess at least 95 percent of their students on the Massachusetts Comprehensive Assessment System (MCAS) and/or the state English Language Learner (ELL) assessment.[15]

Any school with less than a 95 participation rate in ELA , mathematics, or science will automatically fail to make its AMO in the aggregate or the subgroup(s) for which the rate falls below 95 percent, and as a result can only be classified in Levels 2 and higher. A school that does not meet its participation AMO may not be classified in Level 1: *On Track*. To meet the participation standard, English language learners in their first year of U.S. schooling must participate in the state ELL assessment and the MCAS for mathematics. ELLs in their second year of U.S. schooling and beyond must participate in both the English language arts (ELA) and mathematics MCAS and the state ELL assessment. Exceptions to the ELL assessment requirement will be made only where accommodations for ELLs with disabilities are not available for a particular test.

2. Student achievement

ESE will measure student achievement for districts, schools and subgroups with three indicators:

1. Closing proficiency gaps in ELA, mathematics, and science, as measured by the Composite Performance Index
2. Reducing the percentage of students scoring in the *Warning/Failing* category in ELA and mathematics
3. Increasing the percentage of students scoring in the *Advanced* category in ELA and mathematics

Progress on reaching the statewide goal of **reducing the proficiency gap by half by 2017** will be measured with the Composite Performance Index (CPI), a metric used in Massachusetts since 2004 that rewards continuous improvement toward proficiency. The CPI awards points to each student based on their achievement on the ELA, mathematics, or science assessments; a CPI of 100 indicates that all students are proficient or advanced. The points for all students in the district, school or subgroup are summed together and then divided by the number of students in the group being measured. The result is the CPI for that group and subject. For accountability purposes, ESE combines all tested grades when generating a district, school, or subgroup CPI. The following table provides an example CPI calculation for a group of 20 students.

MCAS Performance Level (Scaled Score Range)	Points Per Student	# of Students	Total Points

[15] Massachusetts currently assesses English language learners with the Massachusetts English Proficiency Assessment (MEPA) but plans to adopt the ACCESS assessment associated with the World-Class Instructional Design and Assessment (WIDA) consortium in 2012–13.

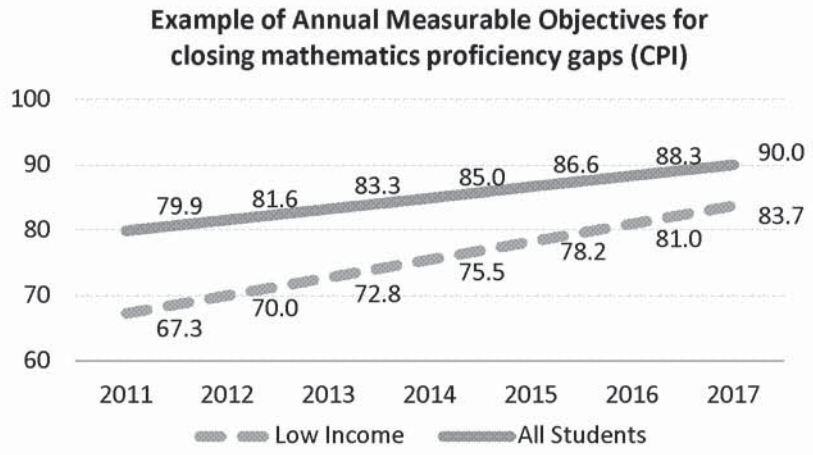
Proficient or Advanced (240–280)	100	10	1000
Needs Improvement High (230–238)	75	4	300
Needs Improvement Low (220–228)	50	3	150
Warning/Failing High (210–218)	25	2	50
Warning/Failing Low (200–208)	0	1	0
Totals		20	1500

1500 ÷ 20 = 75.0 CPI

The proficiency gap, in turn, is defined as the difference between a subgroup's CPI and a CPI of 100. For instance, if a school has a 2010–11 CPI of 79.9 for the "all students" category in mathematics, its mathematics proficiency gap would be 20.1 CPI points, or 100 minus 79.9.

ESE will set differentiated targets for all districts, schools, and subgroups to close proficiency gaps in ELA, mathematics, and science. The goal for all will be same: to reduce the proficiency gap by half by 2016–17. Targets will be differentiated based on the group's baseline in the 2010–11 school year, an acknowledgment that every district, school, and subgroup will be starting from a different place and that those furthest behind will have the most progress to make.

For example, the school referenced above with the proficiency gap of 20.1 CPI points for all students will need to reduce that gap to 10 points by 2016–17, so its 2016–17 target will be a CPI of 90. The 10 CPI points the school is required to gain will be divided into six equal increments to establish targets for each of the six school years until 2016–17. Other subgroups within this school would have different CPI baselines and targets to reflect the need for different rates of improvement to reach the 2017 goal. For instance, if low income students in the same school have a CPI of 67.3 in 2011, their target will be 83.7 by 2017, a faster rate of increase than that of all students. The graph below illustrates this example.



ESE will assign credit in the Progress and Proficiency Index based on how close the district, school, or subgroup comes to meeting the annual targets for ELA, mathematics, and science. Full credit will be given to those that meet the target, as well as to schools whose CPI meets the 80th percentile or higher for the group when comparing statewide results (currently the 80th percentile equates to a CPI of approximately 95 for ELA and 91 for mathematics). This allows us to implement a key feature that was requested by our stakeholders: to enable high performing groups to meet the target even with minor drops in performance. Substantial partial credit is awarded for those that perform close enough to the target to fall within the error band: a range around the target that accounts for potential measurement error. Error bands currently range from 1.0 to 4.5 CPI points, depending on the size of the student group and range of assessment scores, and are generally equivalent to a 95 percent confidence interval.

% Awarded	Achievement Outcome
100%	Met AMO target or met CPI of 80th percentile for the group
75%	Met target as a result of error band
50%	Improved below target and outside of error band
25%	No change
0%	Decline in CPI

The second achievement indicator will be progress in **decreasing the percentage of students scoring in the *Warning/Failing* category** of the ELA and mathematics MCAS assessments. This indicator holds districts and schools accountable for their lowest performing students and rewards continuous improvement in reducing the percentage of low achievers, ensuring that the focus remain on all students, not just those closest to being proficient. Similar to our statewide goal of reducing the proficiency gap in half by 2017, ESE will set AMO targets for districts and schools to reduce their percentage of students in the *Warning/Failing* achievement categories.

For example, if 14 percent of all students in a school scored *Warning/Failing* in 2010–11, the school's goal would be to reduce that percentage for the "all students" category to 7 percent by the end of the 2016–17 school year. The 7 percentage points would be divided into six equal increments to establish annual targets. Similar to the proficiency gap measure, groups would have differentiated targets. For instance, if Hispanic students in that same school had a starting *Warning/Failing* percentage of 22%, the goal would be 11% *Warning/Failing* for that subgroup by 2017.

ESE will assign full credit for this indicator to those that meet the target or reach the *Warning/Failing* percentage of the 80th percentile for the group (that is, the percentage at which only 20 percent of the group had lower *Warning/Failing* rates). Others will be awarded partial credit for making progress toward that goal.

% Awarded	Achievement Outcome
100%	Met target or met percentage of 80th percentile of the group
75%	Met target as a result of error band
50%	Improved below target and outside of error band
25%	No change
0%	Decline in Warning/Failing percentage

The third achievement indicator is **improvement in the percentage of students scoring *Advanced*** on the ELA and mathematics MCAS assessments, intended to hold districts and schools accountable for continuous improvement beyond proficiency. Fewer than 5% of students who score *Advanced* on the grade 10 MCAS tests require remedial courses in college, so creating an incentive to reach *Advanced* will also foster college and career readiness.

ESE will assign credit for this indicator based on changes in a group's percentage of students scoring *Advanced* relative to the prior year.

% Awarded	Achievement Outcome
100%	Greater than a 4 percentage point improvement in *Advanced*
75%	3-4 percentage point improvement in *Advanced*
50%	1-2 percentage point improvement in *Advanced*
25%	No change
0%	Decline in *Advanced* percentage

3. Growth/Improvement

Massachusetts views the ability to include student growth and improvement along with

achievement in our accountability system as a major benefit to this waiver opportunity.

Since 2008 Massachusetts has annually reported a measure of student growth on the MCAS. Each student with at least two consecutive years of MCAS scores receives a student growth percentile (SGP), which measures how much the student changed relative to other students statewide with similar scores in previous years. Student growth percentiles range from 1 to 99, where higher numbers represent higher growth and lower numbers represent lower growth. SGPs are calculated for both ELA and mathematics in grades 4 through 8 and grade 10, and we aggregate them for groups of students with the group median.

Our impact data clearly demonstrate that high levels of growth place students on track to proficiency and, in turn, college and career readiness. Specifically, our data show that growth at the 60th percentile results in all students being on track to proficiency in ELA and the vast majority of students being on track to proficiency in math. Accordingly, in PPI calculations, ESE will assign credit to districts, schools, and subgroups for substantial growth/improvement. Our targets for growth/improvement and proposed assignment of credit are described below.

- Attaining an SGP of at least 10 points over the median SGP for the relevant group. For example, the statewide median SGP for special education students is 42, so the special education subgroup within a school or district would meet this standard with an SGP of at least 52.

- Increasing the group's median SGP by 15 points over the previous school year; or

- Reducing the percentage of non-proficient students by at least 10 percent (assuming at least 40 students in the group are tested).

% Awarded	Meet SGP Target		Increase SGP		Decrease % Not Proficient
100%	10 points or more above group median	or	+15 points	or	≥10%
75%	0 to 9 points above group median	or	+10–14 points		
50%	1 to 9 points below group median	or	+5–9 points		
25%	10 to 19 points below group median	or	+1–4 points		
0%	20 or more points below group median	or	≤0 points	or	<10%

4. High School Graduation and Drop Out Rates.

For high schools, we will include both graduation and dropout rates in the Progress and Performance Index as indicators of success in preparing students to be ready for college and careers. Massachusetts is currently exploring additional measures of college and career readiness for use in the PPI and will propose to include other measures as they become available.

High schools will be held accountable for their cohort graduation rate and will be required to meet the state target to receive full credit in the PPI. However, the PPI will also award partial credit for continuous improvement in the four- and five-year graduation rates. The chart below describes points assigned for 2011–12. In 2012–13 and beyond, Massachusetts will increase its four- and five-year graduation rate targets.

% Awarded	Four-Year Rate		Five-Year Rate
100%	Greater than or equal to 75%	or	Greater than or equal to 80%
50%	≥2 pct. point improvement	or	≥2 pct. point improvement
0%	Less than 75% and less than 2 pct. point improvement	or	Less than 80% and less than 2 pct. point improvement

High schools will also be held accountable for their annual dropout rate. The cohort graduation rate is a cumulative four-year statistic and is difficult to improve in one year. Including the dropout rate provides an opportunity to reward schools that are reducing dropouts, even if the impact has not yet registered in the cohort graduation rate. Districts, schools and subgroups will all be expected to halve their annual dropout rates by 2017, with differentiated targets similar to those described above.

For example, a school with a 2010–11 annual dropout rate of 3.0% in the "all students" category will have a goal of reducing that percentage to 1.5% by the end of the 2016–17 school year. The 1.5 percentage points will be divided into six equal increments to establish targets for each of the six school years until 2016–17. Similar to the CPI targets, groups would have differentiated targets with the same goal. For example, English language learner students in that same school with a starting dropout rate of 5.0% would have a goal of 2.5% by the 2017 school year.

Credit for the annual dropout rate in the PPI will be awarded as follows:

% Awarded	Dropout Rate Outcome
100%	Met target
75%	Met target as a result of error band
50%	Improved below target and outside of error band
25%	No change
0%	Decline in annual dropout rate

Calculating the Progress and Performance Index

The PPI combines all of the indicators described above into a weighted index that uses four years of data. After accounting for the participation requirement, the PPI consists of nine indicators for elementary and middle schools and 11 indicators for high schools in each year, as follows:

Category	Indicators
Participation	ELA, mathematics, science
Achievement	
• Reduce proficiency gaps	ELA, mathematics, science
• Increase % *Advanced*	ELA, mathematics
• Decrease % *Warning/Failing*	ELA, mathematics
Growth	
• Meet growth objective	ELA, mathematics
Additional indicators for high schools	Cohort graduation rate, annual dropout rate

Each year, each district, school, and subgroup will be given full or partial credit, as described above, on each of these indicators. These scores will be combined together for an overall rating for each year. Next, we will combine four years of ratings into a weighted index, with the most recent year's data carrying the greatest weight, as follows:

- Most recent year: 40%
- One year prior: 30%
- Two years prior: 20%
- Three years prior: 10%

PPI results will be reported for each district, school, and subgroup, as well as the state as a whole.

Classifying schools and districts

A primary goal of this proposal is to unify our federal and state accountability systems. Too often today our districts and schools are confused by how the two systems interact and are left unsure of how their accountability designations were determined. We believe that the PPI will solve this problem. The same data indicators across the same number of years will be used both to report federal determinations for districts and schools and to classify them within our state accountability system. A unified system of accountability will help schools understand their data and how it relates to their classification and will help ESE target its resources and interventions effectively to the schools and districts in most need.

We propose to classify schools and districts as follows.

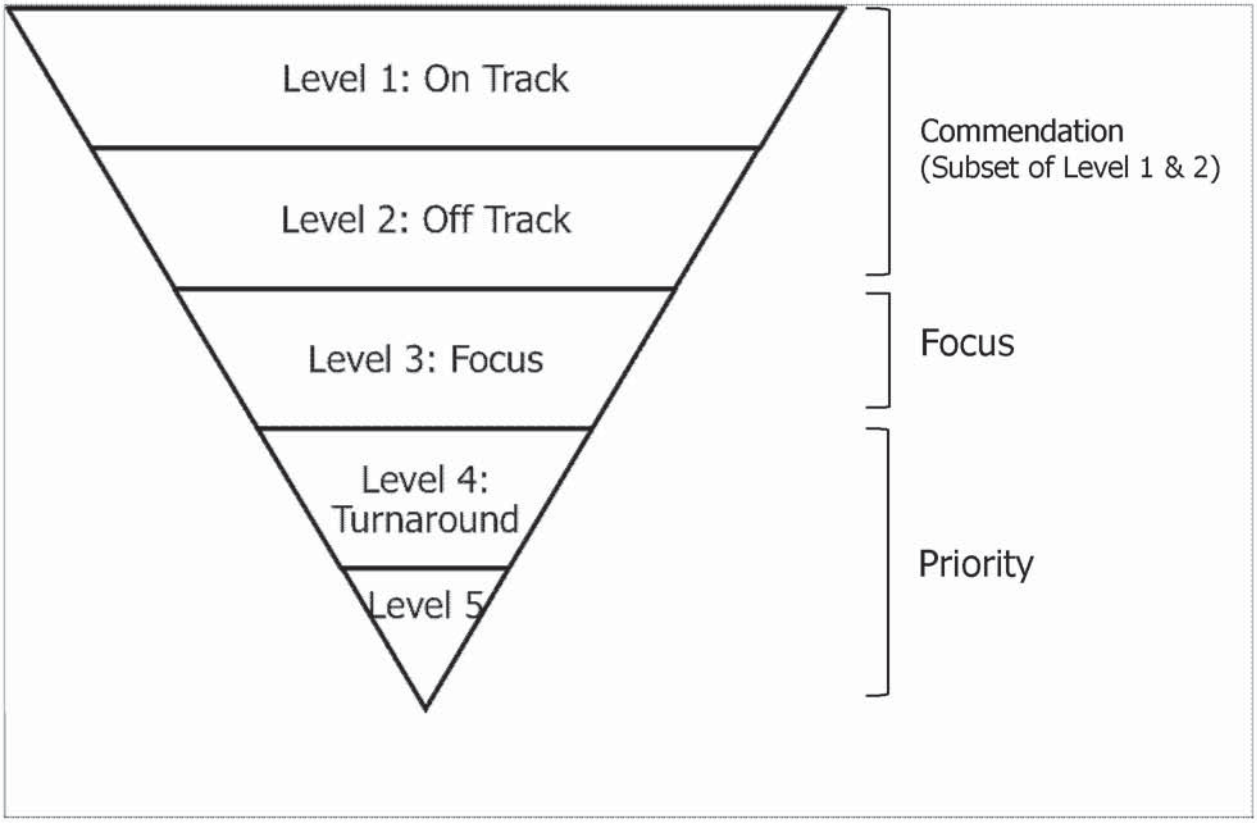
Level	Description
Level 1	On track to college and career readiness
Level 2	Off track from college and career readiness
Level 3	Focus: Lowest performing 20% of schools (including schools with the largest gaps)
Level 4	Priority: Lowest performing schools
Level 5	Priority: Chronically underperforming schools

We will also use four years of data to identify and recognize high achieving and/or greatly improving schools. These will be considered our state's Commendation, or Reward, schools. Commendation schools may be classified as Levels 1 or 2.

Schools will be assigned into accountability levels based on their PPI for two groups: all students and high needs students. The high needs subgroup includes students falling into one or more of the following subgroups: student with disabilities, English language learners, former English language learners, and low income students. Many of our schools and subgroups do not meet our minimum N threshold of 40 students for issuing accountability determinations. By measuring progress and performance for the high needs student subgroup rather than considering each student demographic group individually, we are able to hold nearly 200 more schools accountable for subgroup proficiency gaps along with overall performance. At the same time this approach allows us to retain a focus on all students, including racial and ethnic minorities. In 2010-11 the high needs group included 82% of African-American students and 88% of Hispanic students statewide.

As described in more detail in sections 2.D.i and 2.E.i, the PPI for all students is the primary consideration in identifying schools for placement in Levels 4 and 5, while the PPIs for all students and the high needs subgroup are factors in the placement of schools in Levels 1, 2, and 3. Whether a school or district is on or off track for college and career readiness will determine if it is classified in Level 1 or 2.

Below is a graphical summary of our proposed accountability levels and how they relate to the required designations of Reward, Focus, and Priority schools.



2.C Reward Schools

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

ESE agrees that schools that make great progress deserve to be recognized and plans to meet the federal requirement for Reward Schools by adapting its existing Commendation School identification process. Schools will be identified as Commendation Schools if they demonstrate high achievement, make strong progress, or narrow proficiency gaps. Commendation schools will be determined by identifying the strongest performers over four years on various elements of the Progress and Performance Index (PPI) described in section 2B and will be commended in every category in which they meet the qualifying criteria. Based on preliminary simulations, ESE expects approximately 5 to 10 percent of all schools to annually meet the criteria for designation as Commendation Schools. Districts will not receive Commendation designations.

Commendation for High Achievement

High achieving schools are those with the highest relative performance for both the aggregate and high needs groups across the PPI achievement indicators (i.e., CPI proficiency gaps, percent *Warning/Failing*, percent *Advanced*, annual dropout rate, and four-year and five-year cohort graduation rates). To be eligible, a school must meet the following

conditions:

- Be classified in Level 1;
- Assess 20 or more students in the aggregate in each of the most recent four years and assess 40 or more high needs students in each of the most recent four years;
- Rank within the top 10% of schools with similar grade spans on the PPI achievement indicators for both the aggregate and the high needs groups;
- Achieve an aggregate five-year cohort graduation rate of 94% or higher;[16] and
- Demonstrate improvement on the CPI for the high needs subgroup in both English language arts (ELA) and mathematics over the most recent four school years.

Commendation for High Progress

High progress schools are those with the highest relative performance on the PPI growth/improvement indicators (median student growth percentile and changes in CPI) in both English language arts and mathematics for students in the aggregate. To be eligible, a school must meet the following conditions:

- Be classified in Level 1 or 2;
- Assess 20 or more students in the aggregate in each of the most recent four years;
- Rank within the top 10% of schools with similar grade spans on the PPI improvement indicators for students in the aggregate;
- Demonstrate improvement in the five-year cohort graduation rate for students in the aggregate over the most recent four school years, or achieve an aggregate five-year cohort graduation rate of 94% or higher for three consecutive years;
- Demonstrate improvement on the CPI for the high needs subgroup in both English language arts (ELA) and mathematics over the most recent four school years.

Commendation for Narrowing Proficiency Gaps

Schools commended for narrowing proficiency gaps are those with the highest relative performance on the PPI growth/improvement indicators in both ELA and mathematics for students in the high needs subgroup. To be eligible, a school must meet the following conditions:

- Be classified in Level 1 or 2;
- Assess 40 or more high needs students in each of the most recent four years;
- Rank within the top 10% of schools with similar grade spans on the PPI improvement indicators for students in the aggregate;
- Demonstrate improvement in the five-year cohort graduation rate for students in the aggregate over the most recent four school years, or achieve an aggregate five-year cohort graduation rate of 94% or higher for three consecutive years;
- Demonstrate improvement on the CPI for the high needs subgroup in both ELA and mathematics over the most recent four school years.

[16] This is approximately equivalent to the 75th percentile of five-year graduation rates for the 2011 cohort.

2.C.ii Provide the SEA's list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Schools that make great progress and have success in closing proficiency gaps deserve to be celebrated and recognized for their achievements and can serve as useful mentors for schools that continue to struggle. We plan to designate an elite group of schools (approximately 5 to 10 percent of all schools, based on current simulations) that make substantial gains as Commendation Schools and recognize them annually both through a state-level event and by awarding each school with a certificate for display within the school. Once named, these schools will have the opportunity to engage in regional activities and meaningful partnerships with our Level 3/Focus schools.

The state's District and School Assistance Centers (DSACs), a primary component of our statewide system of support, regularly convene school and district leaders in study groups to discuss key issues such as the characteristics and implementation of interventions that show great promise. Our stakeholders have voiced a clear desire for more systematic way to share best practices, and under this flexibility, our Commendation Schools could serve as valuable demonstration sites. Depending on the availability of funding, these schools will be eligible for a limited number of "promising practice" grants to encourage their leadership teams to participate in communities of professional practice with their peers from schools with similar demographic and performance profiles within the DSAC region, particularly Level 3/Focus schools. This will help connect our lower performing schools with relevant and proven models for improving results.

We anticipate that educators from the state's Commendation Schools will welcome the opportunity to share their lessons learned with leadership teams from other schools and will appreciate the recognition their schools will receive as a result of this new designation.

The partnerships between Commendation Schools and Level 3/Focus schools will be just one facet of a larger system of networking and partnership activities already in place in Massachusetts that we anticipate enhancing through this waiver. For details, please see the description of our process for building state, district, and school capacity in Section 2.G.

2.D Priority Schools

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

Massachusetts currently has a strong system for identifying and intervening in our lowest performing schools and districts. The waiver will enable us to integrate our state system with federal accountability requirements and, in turn, expand the supports available to those schools.

In our current state accountability system, we designate the lowest performing 20% of schools in the state as Level 3. Under state law we may designate up to 4% of those as Level 4 schools: the lowest performing, slowest improving schools statewide. Both Level 3 and Level 4 schools are currently identified with the same indicators we propose to include in the Progress and Performance Index (PPI), using a slightly different methodology. Both designations are made using four years of data. Through this process we have already identified 35 schools as Level 4 schools, 34 of which remain open as of fall 2011 (see Attachment 9). On November 15, 2011, the Commissioner will name an additional six Level 4 schools. We propose to classify all 40 of these schools as Priority schools for the purposes of this waiver.

As new assessment data becomes available, we will identify additional Level 4/Priority schools using the PPI methodology described above to meet the requirement that Priority schools equal 5% of the state's Title I schools. We will continue to identify Level 4/Priority schools from among the lowest performing 20% of schools. However, we will adjust the current methodology for identifying Level 3 schools to ensure that this group includes the schools with the largest achievement gaps, as Level 3 will now be used for identification and classification of our Focus schools. The methodology for identifying Focus schools is described in section 2.E.iii. The Commissioner will have discretion to classify a school as Level 4/Priority based on a number of factors, including resource availability and other information collected beyond the PPI.

State law requires that the total number of Priority schools not exceed 4% of all schools statewide. This limit is larger than the minimum number of schools we will need to designate to meet the federal waiver requirement for Priority schools, so we anticipate no difficulty in integrating the two systems.

2.D.ii Provide the SEA's list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

Overview

As described in Section 2.D.i., our lowest-performing schools are classified as Level 4 or Level 5 in our district framework for accountability and assistance. For the purpose of this flexibility, these will be our Priority schools.

Since the 2010 enactment of the Commonwealth's Act Relative to the Achievement Gap, state law and regulation require that once a school is placed in Level 4, the Department of Elementary and Secondary Education (ESE) must notify the district's school committee, superintendent, local teachers' union or association president, and the school's principal and parent organization. This begins a purposefully detailed, inclusive process designed to involve the community in the turnaround of the Level 4 school, resulting in a redesign plan approved by the commissioner. State law (M.G.L. Chapter 69, Section 1J) requires that the redesign plan be designed only after soliciting the recommendations of a local stakeholder group, convened by the superintendent, that includes representatives from the district's school committee, the school's administration and faculty, local social service, health and child welfare agencies, local workforce development agencies, parents, community members, ESE, and other stakeholders. The federal requirements for school improvement grant funding, both generally and for each intervention model, are integrated within the redesign plan. The superintendent must submit the redesign plan to the local stakeholder group, local school committee, and lastly to the commissioner for approval.

Beyond contributing to approval of the plan, the state assigns assistance liaisons and accountability monitors, defines exit criteria, including measurable annual goals tailored to each school and based on empirical data, assesses fidelity to the federal turnaround principles as well as district capacity to implement of one of four federally-required implementation models, and provides targeted assistance via partner providers, tools, templates, and other resources.

Redesign Plans

Our system requires districts with Level 4 schools to develop a redesign plan to rapidly implement interventions aligned to each of *Conditions for School Effectiveness*. These conditions identify research-based interventions that all schools, especially those that are most struggling, need to implement to effectively meet the learning needs of every student. Our *District Standards and Indicators* identify the characteristics of effective districts in supporting and sustaining these conditions in their schools.

We provide our Level 4 schools and districts with a redesign plan template that meets the statutory requirements for a "turnaround plan" under state law, and also serves as the foundation for any district application for federal School Improvement grant (Section 1003(g)) funding. The redesign plan takes the place of any other school improvement plan and is a multi-part instrument that, for a three-year period:

- Addresses district-level capacity to support its Level 4 schools;
- Provides a blueprint for intervention at each identified school;
- Sets measurable annual goals which serve as the standard for exiting Level 4 status. (Complete details are contained in the redesign plan template, included as Attachment 12.)

Within the redesign plan, districts are required to identify any district-level issues that will be addressed. Prior to identifying interventions in Level 4 schools, they must demonstrate that they have the capacity to plan for, implement, and monitor school-level redesign efforts, including the effective allocation of resources (people, time, materials, and fiscal, including all ESEA funds).

In addition, the district must:

1. Clearly describe what their approach will be to result in rapid, systemic change in its Level 4 schools within three years. This must include a theory of action guiding their strategies and school-level interventions;
2. Provide a description of the district's redesign and planning process, including descriptions of teams, working groups, and stakeholder groups involved in the planning process, especially the process used by district-and school-level redesign teams to identify the interventions selected for each Level 4 school;
3. Describe how the district will recruit, screen, and select any external providers to provide the expertise, support, and assistance to the district or to schools;
4. Describe the district's systems and processes for ongoing planning, supporting, and monitoring the implementation of planned redesign efforts, including the teaming structures or other processes, such as the use of liaisons, coaches, or networks, that will be used to support and monitor implementation of school-level redesign efforts;
5. Describe which district policies and practices currently exist that may promote or serve as barriers to the implementation of the proposed plans and the actions they have taken or will take to modify policies and practices to enable schools to implement the interventions fully and effectively;
6. Describe how the district will ensure that the identified school(s) receive ongoing, intensive technical assistance and related support from the state, district or designated external partner organizations;
7. Describe how the district will monitor the implementation of the selected intervention at each identified school and how the district will know that planned interventions and strategies are working,

Examples of Meaningful Interventions

In addition to identifying systems, processes, and issues at the district level, the plans must also describe how the school will implement interventions aligned to the Conditions for School Effectiveness as a blueprint for school-level redesign efforts. A description of each condition and examples of meaningful interventions aligned with the turnaround principles that districts with Priority schools could implement is below.

Condition for School Effectiveness	Examples of Interventions	Turnaround Principles Addressed
Effective School	The district has a pipeline for identifying, recruiting,	Provide strong

Leadership	selecting, and supporting school leaders who are likely to be successful in accelerating student achievement and supporting adult learning in the Level 4 school.[17] The intervention includes quantitative and qualitative tools that create a profile of the effective leader and places the individual within a continuum on an individualized professional learning plan that matches support to the principal's strengths and needs. The principal receives a signing bonus to work in a Level 4 school and has further opportunities for financial rewards based on the school meeting specific academic achievement targets.[18]	leadership
Principal's Staffing Authority	Base the district and Level 4 school's recruitment, selection, incentives, and induction efforts on rigorous turnaround competencies that aggregate best practices and research about effective teaching and turnaround schools from leading teacher recruitment organizations (e.g., Teach for America, The New Teacher Project, the Boston Teacher Residency Program) and that serve as key leading indicators of the teacher's likely effectiveness in improving student achievement outcomes.[19]	Ensuring that teachers are effective and able to improve instruction; Strengthen the school's instructional program
Professional Development and Structures for Collaboration	Redesign the school day to facilitate school-based learning communities for teachers in Level 4 schools to create opportunities for peer-led support and accountability. This intervention provides space and place for differentiated paths and plans for teacher growth and improvement depending on their career stage and performance, as well as their rating of practice and impact on student learning based on multiple measures. The intervention may also include instructional coaches who work with teachers to strengthen their skills in areas such as lesson planning, student data analysis, and in-class pedagogy. (For a more detailed description of this particular intervention, please refer to Section 2.E.iii.)[20] The intervention would be coupled with a	Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's instructional program; Use data to inform instruction and for continuous

[17] Examples of how we prepare district and school leaders to effectively lead their systems, are posted at http://www.doe.mass.edu/edleadership/nisl/.

[18] Details about the state's vision for creating a cohesive school leadership system are posted at http://www.doe.mass.edu/edleadership/mcls/

[19] Details on the staffing authority intervention are posted at http://www.doe.mass.edu/sda/framework/level4/SelectingTeachers.pdf

[20] The state's Common Planning Time Self-Assessment is posted at http://www.doe.mass.edu/sda/ucd/CPTtoolkit.doc.

	schedule for conducting regular learning walkthroughs to place the instruction observed on a continuum of practice that encourages collaborative conversations among participants about the nature of teaching and learning, which can lead to decisions and actions that are deeply rooted in the classroom experience.[21]	improvement
Tiered Instruction and Adequate Learning Time	Implement a tiered system of support focused on system-level change in classrooms, the entire Level 4 school, or across a network of Title I school to meet the academic and non-academic needs of all students, including students with disabilities, English learners, and students who are academically advanced. (For a more detailed description of this intervention, please refer to Section 2.E.iii.)	Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's instructional program; Use data to inform instruction and for continuous improvement
Students' Social, Emotional, and Health Needs	Provide school-based services to address the social, emotional, and health needs of the students in the Level 4 school. The school and parents jointly address the developmental needs of students early in their education; school teams including school nurses, counselors and teachers meet on a regular basis to discuss and address the challenges of individual students; students receive routine and preventative care. As a consequence, the proportion of at-risk students will decline as they progress through school, and inequalities in literacy, numeracy, and other measures of educational attainment would be sharply reduced. (For a more detailed description of this intervention, please refer to Section 2.E.iii.)	Strengthen the school's instructional program; Use data to inform instruction and for continuous improvement; Establish a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement;

[21] The state's Learning Walkthrough Implementation Guide is posted at http://www.doe.mass.edu/sda/ucd/walk/ImplementationGuide.pdf.

		Provide ongoing mechanisms for family and community engagement
Family-School Relationships	Establish a coordinated early childhood education program that provides young children who are likely to belong to the focus group in a Level 4 school with the early learning experiences they will need to succeed in elementary school. The intervention may also employ an intergenerational component that helps parents provide a home environment that supports children's learning needs, provides opportunities for them to monitor the progress of their child and communicate with school personnel, and provides assistance to parents to tutor their children at home to reinforce work done in school. (For a more detailed description of this intervention, please refer to Section 2.E.iii.)	Establish a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement; Provide ongoing mechanisms for family and community engagement
Strategic Uses of Resources and Adequate Budget Authority	Use of our District Analysis and Review Tools (DARTs) to analyze more than 40 quantitative indicators to gauge the overall health of the district and school, especially as compared to like districts and schools that are getting better results over time, to self-evaluate and make sound, strategic decisions in the allocation of resources and in specific areas such as staffing and finance and in serving English language learners.[22] We are also developing a similar tool for examining school and district strengths and needs with respect to its students with disabilities.[23]	Provide strong leadership; Use data to inform instruction and for continuous improvement
Aligned Curriculum	Implement a six-stage process for developing professional learning communities in the school that define the roles and responsibilities of teachers, school leaders, and district leaders at each stage. The six stages are: 1) launching the work of the instructional team to reduce teacher isolation by increasing professional collaboration around the instructional core, establishing a vision and purpose, and handling logistics and setting norms; 2) analyze data and set instructional and performance targets at	Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's

[22] The DART tool is posted at http://www.doe.mass.edu/sda/dart/

[23] The District Data Team Toolkit is posted at http://www.doe.mass.edu/sda/ucd/ddtt/Introduction.pdf.

	each level (school, grade/course, classroom, and for individual students); 3) prioritize students' skill, conceptual understanding, and problem-solving needs, and develop a plan to address each student's individual needs; 4) build and share standards-based lessons; 5) implement collaboratively designed lessons and monitor progress; and 6) celebrate success and review progress by reflecting on the work of the instructional team and archiving and disseminating effective lessons.[24]	instructional program; Use data to inform instruction and for continuous improvement
Effective Instruction	Within a tiered system of support, the district and Level 4 school has a model for English language learner instruction that conceptualizes academic language, effectively addresses the core components of English language acquisition, incorporates academic language in instructional practice, and focuses on mastery that will support these students' successful preparation for college and career. Classroom routines, content and language expectations will be coordinated at each language proficiency level and during transition from one level of language acquisition to the next. Embedded professional development is designed to match the professional and learning needs of staff and to build upon English learner teaching strategies across all content areas. The model includes an English learner coach who works side by side with mathematics and literacy coaches in the Level 4 school, as well as other specialists. The coach follows a schedule that allows for collaboration with other coaches by following an established coaching cycle, as well as "on demand" coaching. The coach identifies language needs, develops and supports sheltering strategies for all English learners in the Level 4 school, and monitors language development.[25]	Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's instructional program; Use data to inform instruction and for continuous improvement
Student Assessment	Within a tiered system of support, the district and school has a balanced system of formative and benchmark assessments. The system is guided by is guided by: 1) Universal Design for Learning (UDL) principles (multiple means of representation, multiple means of action and expressions, and	Ensuring that teachers are effective and able to improve instruction; Redesign the

[24] Professional Learning Community guidance is posted at http://www.doe.mass.edu/sda/ucd/PLCguidance.doc.
[25] Details on our blueprint for tiered systems of support is posted at http://www.doe.mass.edu/mtss/.

	multiple means of engagement), 2) valid research, 3) the analysis of MCAS results and other assessments, and 4) input from professional staff. One such intervention may include the Galileo Instructional Data System. This assessment and data analysis system enhances the ability of teachers, school and district leaders, parents, and students to identify trends in student learning, improve classroom instruction, and ultimately raise student academic achievement. Districts design benchmark (interim) assessments and then use the technology for administration, analysis, and reporting. These assessments provide data to inform instruction, support programmatic decision-making, encourage collaborative inquiry, and enable systematic student interventions in Level 4 schools.[26]	school day, week, or year; Strengthen the school's instructional program; Use data to inform instruction and for continuous improvement

Because our Level 4/Priority schools are required to address all of these conditions at once in their redesign plans, we have seen many of these schools rapidly transform into high functioning learning environments for students. This occurs through the redesign of school and district systems and supports including school leadership, instruction, and family/community partnerships. It also involves a rapid diagnosis of student needs, instruction tailored to the needs of each student, and a culture of high expectations for students, parents, and families.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

Massachusetts has already begun to implement meaningful interventions in its existing Level 4/Priority schools. In January 2010, the state legislature passed *An Relative to the Achievement Gap*, which codified through law and regulation the identification of the state's lowest performing schools as Levels 4 and Level 5. Massachusetts identified 35 Level 4/Priority schools in spring 2010. As of November 2011, 34 of those schools remain open and are in the process of implementing redesign plans. Results from the 2011 MCAS show that two-thirds of our Level 4/Priority schools showed substantial improvement in student achievement in both English language arts and mathematics, so we are confident that our turnaround strategies hold great promise in rapidly improving student results.

Our Commissioner will identify an additional 6 Level 4/Priority schools on November 15,

[26] Details on best practices in using the Galileo Instructional Data System is posted at http://www.doe.mass.edu/omste/galileo/0509teleconf.pps

2011. We will identify additional Level 4/Priority schools based on assessment results from spring 2012 and beyond. We are committed to ensuring that the turnaround principles are implemented in each Level 4/Priority School by the start of the 2014–15 school year.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

In accordance with state regulations governing district and school accountability and assistance (603 CMR 2.00), ESE has established the following academic exit criteria for existing Level 4 schools, which we propose should also apply to Level 4/Priority schools. Please note that as we move forward in time, we will use updated data when establishing thresholds for comparable improvement:

1) Increase the Composite Performance Index (CPI) in English language arts (ELA) and mathematics in the aggregate and for high needs students over a three-year period.

    a) Level 4 elementary and middle schools shall increase the CPI comparable to the improvement that the top 30 percent of improving schools made statewide between 2006 and 2009.
    b) Level 4 high schools shall increase the CPI comparable to the improvement that the top 40 percent of improving schools made statewide between 2006 and 2009.

2) Decrease the percentage of students scoring *Warning/Failing* on standard MCAS tests in ELA and mathematics in the aggregate and for all high needs students over a three-year period.

    a) Level 4 elementary and middle schools shall decrease the percentage of students scoring *Warning/Failing* on standard MCAS tests comparable to the improvement that the top 30 percent of improving schools made statewide between 2006 and 2009.
    b) Level 4 high schools shall decrease the percentage of students scoring *Warning/Failing* on standard MCAS tests comparable to the improvement that the top 40 percent of improving schools made statewide between 2006 and 2009.

3) Achieve and maintain a median student growth percentile (SGP) of 40 or higher in ELA and mathematics in the aggregate and for all high needs students within three years; and

4) By the end of the three-year period for which Level 4 high schools have set measurable annual goals, such schools shall meet the Commonwealth's graduation rate target for

that year for all student groups.

In addition, prior to removing a school from Level 4 status, ESE will ensure that the capacity and conditions are in place at both the district and school levels to sustain that improvement.

2.E Focus Schools

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

State statute requires ESE to identify Level 3 schools as the lowest performing 20% of all schools in the state. We do this using four years of data on the performance of students in the aggregate on the same indicators we plan to use in our Progress and Performance Index (PPI). Schools are identified proportionately by grade span to ensure equitable representation of all types of schools. We propose to combine this approach with one that identifies the schools with the largest achievement gaps and classify all these schools as Level 3/Focus schools.

To identify Level 3/Focus schools under our proposed new system, we will begin by identifying the 10% of Title I schools in the state with persistently low subgroup achievement levels and graduation rates, per the waiver requirements for Focus schools. Among this 10% of schools, we will first select high schools whose five-year cohort graduation rate data over the most recent four consecutive years was below 60% for the high needs subgroup in each of the four years (approximately 20 schools for 2011–12). The remaining schools to meet the 10% requirement will be those with the lowest performance on the PPI for the high needs subgroup. We will select schools proportionately within grade spans, consistent with current practice, and will ensure that English language learners, students with disabilities, and low income subgroups are each represented.

To meet the state requirement to designate the lowest 20% of all schools as Level 3, we will need to identify additional schools in this level. These schools will be those with the lowest performance on the PPI for students in the aggregate. All schools in Level 3, whether identified on the basis of low graduation rates, low high needs subgroup performance, or low aggregate performance, will be considered Level 3/Focus schools.

With each Level 3/Focus School designation we will clearly indicate the student group that should be prioritized at the school; for example, "Focus School: English language learners" or "Focus School: high needs students." If a Focus School has more than one low performing subgroup, then ESE will identify each of the lowest performing groups to maintain priority on the students most in need of additional support. These designations will guide the interventions described in 2.E.iii.

2.E.ii Provide the SEA's list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Timeline

As described in Section 2.E.i, we will use the four most recent years of data to identify Level 3/Focus schools. Beginning in summer 2012, districts will be notified annually if one or more of their schools will be designated as a Level 3/Focus school. This designation will serve as a formal acknowledgement that current practices are not working in a way that serves all students and will trigger a requirement for the district to establish priorities for action and make decisions about the allocation of resources, including people, time, materials, and funding. Our regional District and School Assistance Centers (DSACs) will be available to support these schools in this planning process.

Within 90 days of being designated a Level 3/Focus school, districts will be required to submit a proposal to the Department of Elementary and Secondary Education (ESE) for implementing the interventions they have identified. ESE will review the plans, provide feedback and in some cases, may require districts to implement specific interventions based on our interpretation of the needs assessment or other information, such as findings from a review of the district and its schools by our accountability office.

Once the planning is complete, it is expected that work will begin immediately. The district will be required to implement the interventions as quickly as possible, preferably during the school year in which the school received its Level 3/Focus designation, but no later than the start of the following school year.

Process

Level 3/Focus schools will use the *Conditions for School Effectiveness Self-Assessment* to determine which interventions should be considered the highest priority.[27] This is a rigorous state-developed instrument designed to enable districts and schools to gauge their development of each condition and related interventions along a continuum. (The 11 *Conditions for School Effectiveness* are the same areas that must be addressed by our Level 4/Priority schools in developing redesign plans, as described in Section 2.D.iii.)

The conditions are aligned with our six *District Standards and Indicators*, a set of key

[27] The Conditions for School Effectiveness Self-Assessment is available at http://www.doe.mass.edu/sda/ucd/CSESelf-Assesment.doc.

indicators of the district's ability to effectively support all of its schools while intervening aggressively in its most struggling schools.[28] In performing the needs assessment, the district may discover that more systemic change is needed in its systems and structures, such as how the school is governed, staffed, or funded.

All of the state's districts are expected to make steady progress toward implementing the *Essential Conditions for School Effectiveness* in their schools and those with Level 4/Priority schools are required to develop a redesign plan to rapidly address all 11 conditions. Level 3/Focus schools will be expected to use the *Conditions for School Effectiveness Self-Assessment* to prioritize those conditions directly linked to the most struggling student groups and implement interventions most likely to have a positive impact on these populations. In some schools this may affect only specific student groups, while in others these interventions may have a direct impact on every student.

We propose that a district with one or more Level 3/Focus schools be required to reserve up to 25 percent of its Title I, Part A funds on a sliding scale to support the implementation of interventions. This set-aside will vary depending on the scope of the problem, the number of affected schools in the district, the number of students in the focus population, and the district's overall Title I, Part A allocation.

To conform to the rules for qualifying Title I school attendance areas, we propose allowing the district to set the funding aside at the district level. This will enable the district to address needs in multiple Title I schools or to use Title I funding for district-wide support (e.g., instructional coaches or school networking activities). We anticipate that by giving districts some degree of flexibility in how to use these resources, they will be able to maximize the benefit based on the unique needs of their Level 3/Focus schools.

The following examples illustrate two likely scenarios we anticipate that some districts may face:

- A district with one Level 3 school and a relatively small Title I, Part A allocation may have a focus population that is small in size relative to the overall enrollment of the school. In this case, a single, targeted intervention may be appropriate, the cost of which could approximate 5 percent of the district's overall Title I, Part A allocation.
- Alternately, a district with either multiple Level 3 schools or a single Level 3 school with a large enrollment and for which the focus population is all students may need to fund a broader set of interventions to impact the entire school system. Under this scenario, more resources and a longer-term change process may be needed, and we would require the district to commit up to 25 percent of their Title I, Part A funding over a period of several years.

In exchange for greater flexibility in the use of Title I funds for interventions, we will increase our oversight efforts to ensure the quality and efficiency of district improvement work in the

[28] The District Standards and related indicators are available at: http://www.doe.mass.edu/sda/review/district/StandardsIndicators.doc

Level 3/Focus schools. For example:

- We will ensure interventions are funded based on the scale of the problem and implemented according to prescribed timelines, and we will track the expenditure of Title I funds on specific interventions across years;
- We will require our districts to specify the funding source if non-Title I funds are used in place of or in addition to Title I funds to meet the reservation requirement;
- We will only allow districts to amend their Title I grant application to reallocate unspent funds for interventions on a case-by-case basis and after careful scrutiny; and
- In some instances, we may require a district to carry over unspent funds for an intervention in a given year to fund the intervention in the following year or require that funds for interventions be expended over multiple years.

Examples of Interventions[29]

The Conditions for School Effectiveness Self-Assessment is designed to be an in-depth examination of current practice that identifies areas of strength and highlights areas requiring intervention. The tool delineates the level of development of each condition along a continuum: *Little Evidence*, *Developing*, *Providing*, and *Sustaining*. District and school leaders, the regional District and School Assistance Center (DSAC), staff responsible for day-to-day instruction, and other key stakeholders will work together to use the self-assessment and other sources of information to prioritize those conditions requiring the most urgent attention and identify appropriate interventions. Interventions may be scaled based on need and availability of funds. For example, a district may redesign the school day to provide academic tutoring for a small focus population, or it may engage in a more comprehensive effort to provide a broad array of academic and/or enrichment opportunities for the entire school population.

Below are five sample scenarios that illustrate interventions that districts may select to address the needs of students in their Level 3/Focus schools.

1. A district redesigns the school day to facilitate *school-based learning communities* for teachers in its Level 3 school(s) to create peer-led support and accountability opportunities. Professional development requirements are raised, and teachers and school leaders work together to develop effective instructional practices, studying what actually works in classrooms. With the implementation of Massachusetts' new educator evaluation regulations, this intervention provides space and place for differentiated paths and plans for teacher growth and improvement depending on their career stage and performance, as well as their rating of practice and impact on student learning based on multiple measures. It may also include instructional

[29] The process for identifying and implementing interventions described in this section applies to all schools placed in Level 2, 3, and 4 on our framework for district accountability and assistance. The primary differences are the scope of the problem (e.g., districts with one or more Level 4 school must implement multiple interventions aligned to all 11 Conditions for School Effectiveness; those with Level 3 or Level 2 schools other levels may implement fewer, more targeted interventions to address specific areas of need) and the level of ESE engagement (e.g., districts with Level 2 schools have relative autonomy in selecting interventions; districts with Level 3 schools consult with the DSAC in selecting interventions and must present a proposal to ESE for approval; interventions in Level 4 schools require the Commissioner's approval as part of the redesign plan).

coaches who work with teachers to strengthen their skills in areas such as lesson planning, student data analysis and in-class pedagogy. This approach would strengthen teachers' professional practice and improve the quality of instruction. This intervention would be appropriate for elementary, middle, and high schools.

2. A district implements a *tiered system of support* focused on system-level change in classrooms, the entire Level 3/Focus school, or across a network of Title I schools to meet the academic and non-academic needs of all students, including students with disabilities, English language learners, and students who are academically advanced. The flexible tiers provide a robust and responsive educational environment that provides students with a continuum of multiple supports to meet their needs, with each tier providing an increased intensity of academic and non-academic supports. The movement and the intensity of support are based on data from universal screenings, assessments and progress monitoring, and the data drives the instructional decision-making throughout the process. The tiered system is supported by incorporating technology as an instructional tool and part of a data collection system. For English language learners, the system includes a model for conceptualizing academic language, a framework for effectively addressing the core components of English language acquisition and incorporating academic language in instructional practice, as well as a focus on mastery that will support these students' successful preparation for college and career. For students with disabilities, the system specifies how relevant information from each student's Individualized Education Plan (IEP) will be incorporated into the design and implementation of instruction and assessments to enable students eligible for special education services to fully access the system of tiered instruction and non-academic supports. This approach will help educators know how to provide appropriate levels of interventions for all students and triage supports to meet the needs of every student, especially students with disabilities, English learners, and low achieving students. This intervention would be appropriate for elementary, middle, and high schools.

3. A district provides *school-based services* to address the social, emotional, and health needs of the students in the Level 3/Focus school. The school and its parents jointly address the developmental needs of students early in their education; school teams composed of school nurses, counselors and teachers meet on a regular basis to discuss and address the challenges of individual students; students receive routine and preventative support and care. Students with acute health problems receive services in a timely manner; their health is monitored in a systematic way as they progress through school, and problems are addressed early that might otherwise impede their learning. As a consequence, the proportion of at-risk students declines as they progress through school. This method will boost student performance by addressing the issues in their lives outside the school context that may be affecting their ability to learn at school. Such an intervention would be highly appropriate for

elementary schools, but may also have applications for middle and high schools.

4. A district *redesigns the school day or year* (which may include time before school, after school, vacations, weekends, and summers) to provide a broad array of academic and/or enrichment opportunities to students in the Level 3/Focus school in addition to the learning experiences they already receive. This additional time is focused on a small set of clear and ambitious goals for student learning in which each student has a schedule and academic program tailored to address their individual needs, which may include tutoring and other academic supports. Students are provided with a broad array of enrichment opportunities that deepen their engagement in school in areas including the arts, foreign languages, hands-on science, business, community service learning, and leadership. This type of intervention will help to foster trusting relationships and a sense of belonging for students; engage them in activities and routines intended to reinforce school values, behaviors and attitudes necessary for success such as hard work, perseverance and responsibility; improve the transition from middle to high school; and promote youth leadership, 21st century skill development, and college and career readiness. Such an intervention would be appropriate for elementary, middle, or high schools, and could be targeted to address a subset of students within the school.

5. A district establishes a *coordinated early childhood education program* to provide young children likely to belong to the focus group in a Level 3/Focus school with the early learning experiences necessary to prepare them for the academic expectations of elementary school. Collaborative planning and decision-making structures exist between the district, its Level 3/Focus schools, and early childhood centers. An integrated professional development system is formed, providing early childhood and elementary school educators with frequent opportunities to collaborate and share information and data ensures aligned, age-appropriate learning experiences for students, and structured opportunities for education professionals in both sectors collaborate in helping families and educators identify children's needs early and refer them to appropriate services. Such a program may also employ an intergenerational component to help parents develop a home environment that supports their children's learning needs, provides opportunities to monitor the progress of their child and communicate with school personnel, and provides assistance to parents to tutor their children at home to reinforce work done in school. Such an intervention would be appropriate for elementary schools.

For any school (elementary, middle, or high school), the district may also identify one or more ESE-approved partner(s) to add value and capacity to the district and school in implementing the chosen interventions. (See section 2G for the process we will use for the rigorous review and approval of external providers to support the implementation of

interventions in priority and focus schools.) Potential partners could include technical assistance organizations, community-based organizations as part of our wraparound zone initiative, or a Commendation School in the region with demonstrated success in serving the focus population. (See section 2.C.iii for further detail.)

Evidence of Success in Similar Schools

The interventions described above are purposefully aligned to our *Conditions for School Effectiveness*. Our District Standards, in turn, specify those district-level systems and practices necessary to provide and/or support the implementation of these conditions in schools. In 2009, ESE contracted with the Regional Education Laboratory-Northeast and the Islands (REL-NEI) to provide evidence validating the *Conditions for School Effectiveness*. REL-NEI staff researched libraries, federal resources, and online databases to find rigorous and current research on each condition. The resulting document, the *Conditions for School Effectiveness Research Guide*, is available as a resource to help school and district leaders make sound decisions in selecting interventions aligned to priorities, evaluating them, and justifying their expense.[30]

Based on evidence we have accumulated over the past two years in reviewing district and school plans that address the *Conditions for School Effectiveness*, we are now able to identify and disseminate information about interventions conducted successfully in schools with similar demographic and performance characteristics similar to our Level 3 schools. Specific examples include:

- We have developed a blueprint outlining a tiered system of supports. The *Massachusetts Tiered System of Support (MTSS)* describes the flexible tiers, the core academic and non-academic components of the system, and the larger framework of district supports.[31] This system is aligned with our *District Standards and Indicators*, is one of our 11 *Conditions for School Effectiveness*, and provides the structure needed to develop the policies, practices, and procedures necessary to successfully implement such a system. We have compiled a growing list of presentations from districts and schools that illustrate how they implemented tiered systems of support to address students' academic and non-academic needs, especially the needs of students with disabilities and English language learners. For example, the Memorial Elementary School in Winchendon implemented literacy interventions for struggling readers with a focus on inclusion. The district implemented an uninterrupted 90-minute literacy block in which students are placed in flexible tiers based on data, students receive targeted instruction in specific skills, and progress monitoring is used to determine if students have reached their benchmark using instruments such as DIBELS (Dynamic Indicators of Basic Early Literacy Skills), GRADE (Group Reading Assessment and Diagnostic Evaluation), and the Fountas–Pinnell Benchmarking

[30] The Conditions for School Effectiveness Research Guide is posted at http://www.doe.mass.edu/sda/framework/level4/ConditionResearchGuide.pdf

[31] An overview of our MTSS initiative, including how tiered systems of support align with and are supported by our *Conditions for School Effectiveness and District Standards*, is posted at http://www.doe.mass.edu/mtss/

Assessment System. The district provided a literacy coach for grades K–2, engaged staff in a graduate-level course on inclusion, engaged staff in book study, and trained all staff in the use of PBIS (Positive Behavioral Interventions and Supports). In the first year, the district saw a reduction in referrals for special education services, more than 80 percent of students progressed to the next school at benchmark, and staff reported an increase in student-centered collegial discussion.[32]

- Our Expanded Learning Time (ELT) Initiative, now entering its sixth year of implementation in 19 schools, has provided us with compelling examples of how schools can redesign the school day or year to maximize time for core academics and provide a well rounded education for all students, particularly at-risk students. Massachusetts 2020, our partner in this initiative, has compiled a series of videos and case studies illustrating promising practices and lessons learned in our most successful ELT schools. For example, the Clarence Edwards Middle School in Boston significantly improved students' math scores by adding a Math League program that engaged students in team-based math study and competitions for an additional four hours per week. Other ELT schools, such as the Silvia Elementary School in Fall River, have worked to integrate project-based learning into the school day, either within core academic classes or in theme-based electives such as forensics, zoology, weather, or engineering. Teachers in these schools have reported that the increase in project-based learning has resulted in deeper student engagement and improved understanding of core concepts. The Jacob Hiatt Magnet School, a preK-6, 475-student school in Worcester, partnered with more than 10 arts and cultural institutions to provide integrated enrichment programming across all grade levels. In addition to these success stories, Massachusetts 2020 has also compiled information on highly successful practices related to teacher planning and collaboration.[33]

- For the past three years, our accountability office has undertaken a series of comprehensive district reviews to determine how effective their systems and practices have been at closing proficiency gaps between student groups in their schools.[34] Twenty-seven of these reviews have been completed to date. In 2009 we reviewed six districts where data pointed to responsive and flexible school systems that are effective in supporting all learners, particularly students with disabilities, or where there was an interest in making these systems more effective. In 2010 we reviewed 11 districts with Title I schools that advanced the performance of their English language learners, as measured by MCAS, at a greater rate than the statewide average for all English language learners statewide. In 2011 we reviewed 10 districts that substantially narrowed the proficiency gap for students from low income families

[32] Additional information on Winchester and other presentations are posted at http://www.doe.mass.edu/mtss/ta/presentations/.

[33] Additional examples of the success of Expanded Learning Time are available at Massachusetts 2020's website at http://www.mass2020.org/node/12

[34] The district review reports and related protocols posted at http://www.doe.mass.edu/sda/review/district/

for two consecutive years. Each review has contributed to a growing knowledge base about district systems, practices and interventions that can effectively serve low-achieving students.

- The state's *Guidance and Promising Practices* and *Exploring Best Practices in Redesign* documents, originally developed to support the implementation of our *Conditions for School Effectiveness* in Level 4/Priority schools, provide valuable case studies of successful school turnaround efforts in Massachusetts and nationally. Each resource identifies key practices and interventions the districts and schools profiled in the case studies employed to achieve their reform goals; highlights existing connections between these practices and the *Conditions for School Effectiveness*, and provides links to additional aligned resources to help facilitate redesign and reform efforts.[35] These resources are designed to help school and district leaders maximize collaborative time for teachers and time on learning for students; make informed decisions in identifying partners; explore collective bargaining implications; identify, recruit, and hire outstanding staff; address students' social, emotional, and health needs; and provide alternative English language education program scenarios for English learners, among other interventions.

The flexibility of the ESEA waiver will enable us to provide our districts with a differentiated recognition, accountability, and support system grounded in shared tools, processes, and resources, as well as a common language for discussing the interventions and supports we have learned are necessary to support the needs of our most struggling students.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

[35] A complete list of resources is posted at http://www.doe.mass.edu/sda/framework/level4/

A list of Level 3/Focus schools will be publicly released each year based on the four most recent years of data, with the previous year's data carrying the most weight.[36] We anticipate some movement in and out of this designation each year as prior years' data becomes less heavily weighted. Schools may exit Level 3/Focus School status by improving their performance such that they do not have the largest graduation or proficiency gaps or the lowest overall performance for their grade span. Because of the way the PPI is calculated, to move out of Level 3/Focus School status, schools will need to demonstrate sustained improvement over several years and should be on track for their progress to continue.

We will generate and release our first list of Level 3/Focus schools using the methodology described within this request for flexibility in August 2012, incorporating results from spring 2012.

[36] Schools may meet their AMO targets but still be classified as a Level 3/Focus School if they remain among the lowest performers relative to other schools in the state. This allows ESE to direct its resources and interventions to the lowest performing schools, even if they are meeting their targets.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOL

LEA Name	School Name	School NCES ID #	REWARD SCHOOL	PRIORITY SCHOOL	FOCUS SCHOOL
Ex. Washington	*Oak HS*	*111111100001*		*C*	
	Maple ES	*111111100002*			*H*
Adams	*Willow MS*	*222222200001*	*A*		
	Cedar HS	*222222200002*			*F*
	Elm HS	*222222200003*			*G*
TOTAL # of Schools:					

Total # of Title I schools in the State: _____
Total # of Title I-participating high schools in the State with graduation rates less than 60%: _____

Key	
Reward School Criteria: **A.** Highest-performing school **B.** High-progress school **Priority School Criteria:** **C.** Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the "all students" group **D.** Title I-participating or Title I-eligible high school with graduation rate less than 60% over a number of years **E.** Tier I or Tier II SIG school implementing a school intervention model	**Focus School Criteria:** **F.** Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate **G.** Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate **H.** A Title I-participating high school with graduation rate less than 60% over a number of years that is not identified as a priority school

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Since 2009, Massachusetts has defined its approach to district engagement based on the premise that district accountability and ESE assistance must be closely linked to produce continuous and sustainable improvement. In our view, districts are only as strong as their weakest school, which is why we assign them to one of five levels corresponding with the level assigned to each district's lowest performing school(s).[37] Those requiring minimal state intervention are placed in Level 1; those requiring the most intervention are placed in Level 5 (see illustration below).

Our state system of support enables us to provide comprehensive assistance to districts that is differentiated by need, provides structured opportunities for teachers, administrators and district leaders to engage in activities including coaching, action research, facilitated work teams, professional communities of practice, and resource networking. Our *Conditions for School Effectiveness* and our *District Standards and Indicators* provide processes and tools to support evidence-based practices across the Commonwealth.

Differentiated Recognition

We will commend schools for high performance, high progress, and for success in closing proficiency gaps. Our Commendation Schools will serve as demonstration sites for effective or promising practices, and many will receive incentives to collaborate with Level 3/Focus schools that have been unsuccessful in meeting the needs of their lowest achieving students.

There is an important distinction between the criteria required for identifying Reward Schools under this flexibility and how we propose to implement our Commendation School system: We see value in extending this recognition to Level 2 schools that are off track in meeting their AMOs but still show evidence of closing proficiency gaps among persistently low achieving student groups. The success of these schools will inform discussions around what it takes to support sustained improvement, and we believe this will increase the pool of schools from which educators can learn about and share promising practices.

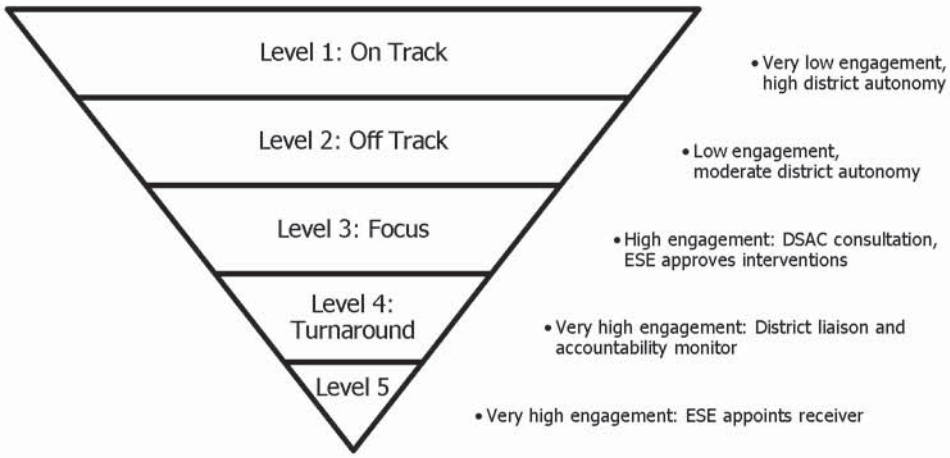
Differentiated Accountability

The amount of flexibility and autonomy each district receives is determined by its classification on the state accountability system.

[37] Exceptions occur when a separate district accountability review process or other information identifies persistent, pervasive issues with district governance or district-level systems. In these rare cases, the district may be identified as Level 4 even though all its schools perform at higher levels. Currently three Massachusetts districts fall into this category.

- Level 1 districts are granted considerable autonomy and flexibility and have access to the online tools and resources available to all LEAs.
- Level 2 districts are granted some autonomy but must perform an annual needs assessment based on the state's *Conditions for School Effectiveness* to implement and/or improve conditions in their schools that are not effectively supporting the needs of all students.
- Level 3 districts receive priority assistance from the regional District and School Assistance Center (DSAC) and engage with the DSAC in both the needs assessment process and in the identification of interventions.
- Level 4 districts must rapidly implement all 11 *Conditions for School Effectiveness* in their Level 4 schools, are assigned a liaison from ESE to engage their leadership team in system-level analysis of district support activities, and are closely monitored for efficacy and impact.
- If a school is placed in Level 5, the most serious designation on our framework, we will engage a receiver to oversee management of the school.

The diagram below summarizes how accountability levels will relate to ESE supports and engagement.



Differentiated Supports

Our framework for district accountability and assistance provides an array of supports, services, and opportunities for schools and districts to engage in professional learning communities focused on establishing high expectations for all students, a common language to discuss school improvement efforts, and a knowledge base from which all educators can benefit.

We provide multiple *resources and tools*, many of which are available online, and are accessible for use by school and district leaders, other educators, school committees, and the public. To support the use of these tools we provide a network of *regional assistance* through our six District and School Assistance Centers (DSACs). In collaboration with partner organizations, DSACs use a regional approach to support self-assessment and planning, provide regional opportunities to learn about and share effective practices; and train, model, and facilitate the

use of our resources and tools. Districts have a strong incentive to participate in DSAC activities because they add value and needed capacity, provide customized professional development and other supports; and serve as a venue for networking opportunities. Further, the relationship between a DSAC and a district is collaborative, not evaluative, fostering trust and an atmosphere of support.

Each DSAC is led by a Regional Assistance Director (RAD), a recently retired superintendent selected based on his or her prior record of accomplishment. Most RADs have operated one or more districts in the region and brings a deep understanding of the local, civic, cultural, economic, and educational context and the ability to meaningfully engage local stakeholder groups in the work. The RAD works directly with the region's superintendents, providing opportunities for honest conversations about strengths and needs. Each RAD is supported by a team that includes a former principal, a data specialist, a mathematics specialist, and a literacy specialist, with the availability of additional support from ESE specialists as needed. Each DSAC serves as a forum for regional networks of school and district teams on various topics, especially the education of English language learners and students with disabilities, and for developing strong instructional leaders.

Other available tools and resources include:

- The District Analysis and Review Tools (DARTs) report on more than 40 quantitative indicators to allow all stakeholders to gauge the overall health of school or district. Users can track pertinent data elements over time and make sound, meaningful comparisons to the Commonwealth or to comparable districts. The DARTs provide a snapshot of school and district trends and allows users to examine trends over the most recent five years of available data; view school- and district-level data on easily accessible graphical displays; reflect and self-evaluate; locate comparable schools and districts elsewhere in the state based on student characteristics; and make comparisons to enable a district to collaborate with a similar district that has shown promising trends.

- Online models and self-assessment tools for district and school improvement that are aligned with our 11 *Conditions for School Effectiveness* and six *District Standards and Indicators*;

- The Early Warning Indicator Index system, a data-driven system to identify high school students who are at risk of not graduating on time. We are using federal Longitudinal Data System Grant Program (LDS-2) funding to expand the system to identify K–12 students that are potentially off track for their grade level or developmental age, including those students who are not on track to graduate with their peers and are identified as potential dropouts.

- We provide targeted grants to enhance district and regional capacity to plan,

implement, and sustain practices to improve student performance that are aligned with the 11 *Conditions for School Effectiveness*. One of our goals as an agency is to guide school and district leaders to think more strategically about how best to maximize the various grants they receive, either through entitlement or competitive opportunities; ensure that grant resources are used in ways that directly contribute to attainment of agency goals; and create new practices within the agency itself to improve our practices around grant development, assessment, and award determination.

- The Commonwealth's professional development programs will be scaled up through the DSACs, through train-the-trainer models, and through online webinars and courses. In addition, the quality of external professional development will be heightened through the establishment of new, more rigorous criteria for professional development providers in literacy and mathematics.

- Our foundational professional development course menu, offered through the DSACs and other sources, is designed to build educator effectiveness in five critical content areas: 1) instructional leadership, 2) sheltering content for English language learners, 3) inclusive instructional practices for students with disabilities, 4) mathematics, and 5) literacy.

- A Behavioral Health and Public Schools Self-Assessment Tool that allows districts and schools to evaluate their practices and strategies for supporting positive behavior and health of students. http://bhps321.org/.

Our *district liaisons* serve as project managers, and provide a direct communication link to ESE and coordinate support to the Commonwealth's 10 largest urban districts to enhance their capacity to support every school, with a particular focus on their Level 4/Priority schools. Working with senior district leadership, the liaisons facilitate the development of professional learning communities in each school, support the use of multiple forms of data to inform system-wide action planning, and provide resources for systematic observation of classrooms, discussion of evidence, and action planning to improve teaching and learning and make effective use of collaborative planning time.

The senior leadership of the Center for Accountability and Targeted Assistance and the district liaisons further this work by convening a monthly meeting of the Urban Superintendents Network (USN). The USN is chaired by superintendents from three different regions of the state and provides leaders from 23 urban districts with an opportunity to share ideas, concerns, and solutions to common problems with each other. Commissioner Chester uses the USN as a resource to gain input on policy decisions, including pursing this waiver opportunity, and practical implementation challenges such as implementing the educator evaluation framework.

As our districts progress towards the goal of halving the proficiency gap for all students, they will steadily progress toward the full implementation of the 11 *Conditions for School*

Effectiveness in all schools, with priority given to schools in Levels 3 and 4.

As shown in the table below, districts will be required to reserve up to 25 percent of their Title I, Part A funds to address identified needs. The *Conditions for School Effectiveness Self-Assessment* will be the primary instrument for identifying and prioritizing those needs, and the funding formerly set aside for public school choice, supplemental educational services, and required professional development will be used for the interventions and supports that address the identified needs.

Designation	Description	Title I Reservation
Level 1	On track: Schools meeting AMOs	Up to 1%[38]
Level 2	Off track: Low subgroup or aggregate performance	1 – 25%[39]
Level 3 (Focus)	Very low aggregate performance or large proficiency gaps (lowest performing 20% of schools)	1 – 25%
Level 4 (Priority)	Underperforming schools	1 – 25%
Level 5 (Priority)	Chronically underperforming schools	1 – 25%

[38] A district that receives a Title I, Part A allocation of greater than $500,000 must reserve not less than 1% of its Title I, Part A allocation to carry out the provisions of section 1118, including promoting family literacy and parenting skills.

[39] The size of the reservation that will be required will be based on the scope of the problem the district has identified, the size of the focus school, and whether the district serves multiple focus schools.

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

The state's district framework for accountability and assistance has established a coherent structure for linking ESE accountability and assistance activities with districts based on their level of need and has provided school and district leaders with common indicators and tools for diagnosing problems and identifying appropriate interventions. To guide this work we have developed two important tools:

- The *District Standards and Indicators* identify the characteristics of effective districts in supporting and sustaining school improvement.
- The *Conditions for School Effectiveness* identify those research-based practices that all schools, especially our most struggling schools, require to effectively meet the learning needs of all students. This tool also defines what each condition looks like when implemented purposefully and with fidelity.

As described in Section 2.F, our framework provides an array of supports, services, opportunities, and incentives for schools and districts to engage in professional learning communities focused on high expectations for all students, school and district improvement efforts, and the formation of a knowledge base from which all educators can build their capacity to support student learning.

The interventions in our Focus and Priority schools will be aligned to the *Conditions for School Effectiveness*, allowing us to compare the implementation of these interventions across all schools, between schools with similar demographic profiles and performance histories, and from classroom to classroom. This will provide state, district, and school leaders with a shared understanding of what is necessary to effectively achieve these conditions; where and when innovation should be encouraged and where consistency should be maintained; and

how scarce time, fiscal, material, and human resources can be allocated efficiently and effectively.
Our user-friendly, interactive data reporting tools like the District Analysis and Review Tool (DART), our School and District Profiles website, and our Education Data Warehouse also provide valuable information on leading indicators and student outcomes for all districts, schools, and student groups.

Using these data, our District and School Assistance Centers (DSACs) will give first priority for technical assistance to districts with Level 4/Priority and Level 3/Focus schools within their region. The DSACs will serve as a hub for engaging educators in professional learning communities, and our Commendation Schools will serve as demonstration sites to highlight promising and effective practices.

Our proposed system will hold districts accountable for improving their school and student performance. All districts, including those in Level 1, will be required to develop and implement an annual self-evaluation and district improvement planning process using our district standards and indicators, resulting in a three-year District Improvement Plan. This plan will be designed to improve performance, particularly in the Level 3/Focus and Level 4/Priority schools in these districts.

Currently every school annually adopts school performance goals and develops and implements a written School Improvement Plan to improve student performance. We propose no change to this requirement through this waiver request. Under state law the school and district improvement plans must be aligned with one another and be based on an analysis of data that includes but is not limited to student performance and the District Analysis and Review Tool (DART) provided by ESE, as well as an assessment of actions the district and its schools must take to improve that performance.

The accountability and assistance level of a district is determined by the level of its lowest performing school, and the level of ESE engagement and funding that may be required to implement interventions increases as the needs of one or more schools in the district increase.

Commendation Schools
As described in Section 2.C.iii, we will call our Reward schools "Commendation Schools." These schools will be annually recognized through a state-level event to promote and celebrate their significant progress, high performance, and/or success in closing proficiency gaps and will receive a Commendation School certificate for display within the school.

Under this flexibility, our Commendation Schools will serve as demonstration sites within each DSAC for practices that are effective or show great promise. Dependent on funding availability, Commendation Schools will be eligible for a limited number of promising practice grants to encourage their involvement in networking activities and other efforts to

disseminate best practices and lessons learned. In particular, we will seek to foster close partnerships between Commendation Schools and Level 3/Focus schools that share similar demographic and performance profiles. Commendation Schools will be selected from schools that are in Levels 1 and 2, based on their progress and performance.

Level 1

Districts in which all schools are placed in Level 1 will be considered Level 1 districts, indicating that they are making steady progress toward full implementation of the *Conditions for School Effectiveness* while recognizing the need to continue to support all students. Most of these districts will not be required to reserve Title I, Part A funding for interventions or supports; those that receive more than $500,000 will be required to reserve 1 percent for parent/guardian involvement. These districts will retain access to all of the resources and tools available to districts with more serious issues. A Level 1 school in a district with Level 2, 3, or 4 schools will receive the lowest priority for support and intervention.

Level 2

Districts where the most serious accountability level of any school is Level 2 will be considered Level 2 districts. This designation will require the district to assess the level of implementation of one or more of the *Conditions for School Effectiveness* in the Level 2 school(s) and provide the support necessary to increase their effectiveness. The district will be required to reserve a portion of its Title I, Part A allocation to fund interventions and supports that deepen the level of implementation. The district will be required to use the *Conditions for School Effectiveness Self-Assessment* to identify priorities but will retain the flexibility to decide which interventions to fund, based on its unique needs. A Level 2 school in a district with Level 3 or 4 schools will receive moderate priority for support and intervention. ESE will review all proposals to fund interventions in Level 2 schools prior to implementation.

Level 3/Focus

Districts with one or more Focus schools will be placed in Level 3. Designation as a Level 3/Focus School will serve as a clear sign that current practices are not working in a way that serves all students and that urgent and dramatic change is needed for, at a minimum, the focus population. All Level 3 districts must use the *Conditions for School Effectiveness Self-Assessment* to identify unmet conditions and revise their District Improvement Plan and School Improvement Plans to meet them.

Level 3 districts will be required to reserve a substantial portion of their Title I, Part A allocations to fund those interventions aligned to the *Conditions for School Effectiveness* most likely to have an immediate, positive impact on the focus population. In addition, districts will be required to evaluate the extent to which their own systems and processes anticipate and address issues including school staffing, instructional and operational needs, especially at their lowest performing schools.

Any district with one or more Level 3/Focus schools will receive priority assistance from the regional District and School Assistance Center (DSAC), and seek their counsel in using the *Conditions for School Effectiveness Self-Assessment* to identify priorities and interventions. Level 3 districts must present a proposal to ESE for review and approval prior to the implementation of interventions. These proposals will be subject to the requirements provided in Section 2.E.iii.

Level 4/Priority

Districts with one or more schools among the lowest performing 4 percent of schools in the state may be placed in Level 4. These districts will be required to reserve up to 25 percent of their Title I, Part A allocation and other funds (such as federal school improvement grant (Section 1003(g)) funding) to support interventions to rapidly implement all of the *Conditions for School Effectiveness* in its Level 4/Priority school(s). A description of the interventions aligned with the turnaround principles that district with Level 4/Priority schools will implement is provided in Section 2.D.iii.

ESE may appoint an assistance liaison to support any district placed in Level 4 to help in the development and implementation of a turnaround (redesign) plan for each of its Level 4 schools, along with an accountability expert to monitor whether the goals, benchmarks, and timetable in the redesign plan for each of the Level 4 schools are being met.

It is important to note that some districts may be placed in Level 4 because of concerns raised during a district accountability review process, even if their schools' performance is higher than Level 4. An assistance liaison will support these districts in district improvement planning to meet state regulations, and an accountability expert will monitor whether the goals, benchmarks, and timetable in the District Improvement Plan are being met.

Level 5/Priority

Districts with at least one Level 5/Priority school will be placed in Level 5, the most serious category in our accountability system, representing receivership. Like Level 4 schools, these will be considered Priority schools for the purpose of this flexibility.

The Commissioner may place a Level 4 school in Level 5 at the expiration of its redesign plan if the school has failed to improve as required by the goals, benchmarks, or timetable of its redesign plan; or if district conditions make it unlikely that the school will make significant improvement without a Level 5 designation. When a district is placed in level 5, the Commissioner will appoint a receiver for the district. The receiver (according to state law M.G.L. c. 69, § 1K) will retain all of the powers of the superintendent and school committee and full managerial and operational control of the district. Up to 25 percent of the district's Title I, Part A application may be used to fund interventions and supports at ESE's discretion.

Districts are independently eligible for placement in Level 5 on the basis of a district review; the report of an appointed accountability monitor; a follow-up review report; quantitative

indicators set out in state regulations; or failure of a Level 4 district to meet the ESE-approved benchmarks or goals in its improvement plan in a timely manner.

Identification of External Providers

In some cases, a district may seek to collaborate with one or more external providers to support the implementation of interventions in Level 3/Focus and Level 4/Priority schools. Under this flexibility, we propose to extend our current process to identify external providers to our Level 3/Focus schools. This will expand our state capacity to serve our lowest performing schools and districts with high quality interventions demonstrated to improve student outcomes.

We have issued a series of procurements, each with an emphasis on a particular Condition for School Effectiveness, to identify Priority Partners with a proven record of accomplishment and demonstrated effectiveness in accelerating school improvement. Interested providers may respond to these opportunities on a rolling basis. All applicants are put through a rigorous review process prior to being selected.

Five-person review teams that include external and internal reviewers with relevant expertise and experience review written proposals from potential providers. All review teams participate in a training session, facilitated by ESE, to orient them to the review process and to participate in a joint scoring activity. Submissions are evaluated through a two-tier review process, as described below, with only top scoring proposals moving to Tier Two.

In Tier One, a formal review of each proposal will be conducted using a standard process and scoring rubric to assess the following qualification areas: *Defined Theory of Action*; *Experience and Willingness to Collaborate for Turnaround*; *Ability to Build Capacity for Sustained Improvement*; and *Proven Outcomes-Based Measurement Plan*. A subset of the review team will read and score each proposal. The outcome of each review will include: 1) a Tier One evaluation score, based on the combined scores of the reviewers; 2) a summary of strengths and weaknesses; 3) a set of questions and/or areas for further clarification to be addressed. The full review team will convene after all proposals have been reviewed and scored by teams. The purpose will be to develop a shared understanding of each proposal's team score, strengths/weaknesses, and areas in need of further clarification; based on this information, the review team will come to agreement about which proposals will proceed to the Tier Two Evaluation.

For each proposal that advances to Tier Two, the review process will involve a thorough evaluation of the applicant's demonstrated record of effectiveness and financial capacity. In addition to the evidence submitted in the written proposal, customer reference interviews will be conducted by an ESE team member, using a standard protocol and reference interview rubric. The interviewer will score the results; detailed notes will be shared with one other member of the review team.

Based on the results of the Tier One and Two evaluations, external provider management teams with high scoring proposals will be asked to participate in an interview with the review team. The interview will include both standard and customized questions based on the review of written proposals and reference interviews to clarify key issues; solicit additional information; and evaluate the provider's understanding of the expectations for working with a Level 3 or Level 4 school. The management team may also be asked to submit an amended proposal that reflects the feedback and expectations shared by the review team during the interview.

The full review team will make recommendations for the selection of Priority Partners, based on the combined results of the Tier One and Tier Two evaluations and the management interviews.

Reducing burden and enhancing fiscal flexibility

We view this flexibility as an opportunity to add momentum to current initiatives designed to guide school and district leaders in developing their improvement plans while also sharply reducing the administrative burden the existing dual accountability systems currently create. The fiscal flexibility offered will also enhance this work by allowing our districts to use their fiscal resources more strategically.

Our state law already calls for a single three-year District Improvement Plan and annual action plans, and a single School Improvement Plan. Moreover, these plans must be aligned and must be based on an analysis of data, including but not limited to data on student performance, as well as an assessment of actions the district and its schools must take to improve that performance.

Under this flexibility, our existing integrated district and school planning cycle would replace the requirements for plans currently mandated under ESEA sections 1116(b) and 1116(c).

At present, districts must distribute 15 to 30-plus page local and school reports annually, as required under ESEA section 1116(c). The development and distribution of these report cards place an unnecessary burden on districts and schools. Their creation consumes valuable resources and the information they contain is dense, technical and of little use to parents, particularly those who cannot speak English. ESEA currently requires districts to send home at least seven different notifications to parents: the public school choice notification; the supplemental educational services (SES) notification; the report card; the district accountability status notification; the school accountability status notification; the right-to-know teacher qualification request; and the right-to-know notification of teachers not meeting highly qualified requirements.

We believe that report cards are duplicative, as we currently require districts to distribute MCAS Parent/Guardian Reports to the parents/guardians of every child participating in our assessment program (grades 3–8 and 10). These four-page reports give detailed, parent-

friendly information on student achievement in literacy, mathematics, and science and technology/engineering as compared to the child's school, district, and state. MCAS Parent/Guardian Reports are produced by the state in the 10 most common languages spoken in Massachusetts homes.[40] In addition, we also require districts to send parent/guardian reports home with every child participating in our English learner assessment program (grades K–12). In both cases, the reports are produced at the state's expense each fall and shipped to districts for distribution to parents.

Under this flexibility, our existing Parent/Guardian Reports would replace the report cards currently required under ESEA section 1116(c). We would adapt our reports to include the accountability and assistance level of the child's school, what this designation means, and how parents/guardians can become involved in school and district improvement activities; and information about teacher quality and the right-to-know requirements regarding teacher qualifications. We would continue, however, to require our Title I schools to provide parents and guardians with timely notice when their child has been assigned or has been taught for four or more consecutive weeks by a teacher who is not highly qualified.

We believe this streamlined method of communicating information about student, school, district, and state performance will reduce duplication and unnecessary burden, allowing school and district leaders to save valuable time and resources. This method will also ensure that parents/guardians receive the information that will be most useful for them, presented in a clear and concise format and language.

With this proposal, we request a waiver of the requirements in ESEA sections 2141(a), (b), and (c) regarding highly qualified teacher improvement plans and the associated restrictions on the use of Title II-A and Title I, Part A funds. Flexibility from these requirements will allow ESE and our state's school districts to focus fiscal and staff resources on the development and quality implementation of our new educator evaluation and support system, while reducing the burden that would come with implementing mandates that do not align with current efforts.

We further propose to use the flexibility offered to transfer funding from authorized programs into Title I, Part A and the optional flexibility to repurpose the 21st Century Community Learning Center funds. Conversations with district leaders and other stakeholders made clear that the freedom to think differently about these funding sources will allow the state and districts to enhance the Commonwealth's already strong record of achieving college and career readiness for its students, a meaningful system of accountability and supports, and effective instruction and leadership in our public schools. It will also potentially allow the state to streamline and better coordinate grant application processes and reduce burden on districts.

In addition, Massachusetts is interested in ways that federal funds might leverage state and

[40] A recent survey found that this is more languages than any other state.

local revenue sources to encourage the implementation of strategies that have a strong likelihood of accelerating student progress. Toward this end, the Commonwealth plans to make some Title I, Title II-A, and 21st Century Community Learning Center funds available contingent on local district revenue matching to support activities such as: an expanded instructional day and/or instructional year; year-round school calendar; targeted teacher training for high need areas (e.g., working with ELLs, STEM subjects); differentiated staffing designed to provide differentiated academic interventions for students; expanded social, emotional, and health supports and interventions; differentiated compensation tied to productivity and responsibility; and job-embedded teacher and administrator development tied to productivity goals.

Minnesota

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

2. A Develop and Implement a State-Based System of Differentiated, Recognition, Accountability, and Support

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012-2013 school year, and an explanation of how the SEA's Differentiated recognition, accountability, and support system is designed to improve student achievement, school performance, close achievement gaps and increase the quality of instruction for students.

Minnesota's proposed system of recognition, accountability and support has three goals:

1. Fairly and accurately measure the performance of all schools
2. Identify those Title I schools that need the most support
3. Give schools the data and tools they need to assess their needs and achieve meaningful school improvement.

At the core of this effort is the use of multiple measurements. Educators around the state have been asking to be judged not only by student proficiency rates but also by their ability to achieve high individual student growth, particularly with students from lower-performing subgroups. Minnesota's proposed system does that in a way that extends the information currently provided in Adequate Yearly Progress (AYP) system to provide a more complete picture of school performance.

a) Does the SEA's accountability system provide differentiated recognition, accountability and support for all LEAs in the state and for all Title I schools in those LEA's based on(1) student achievement in reading/language arts and mathematics, and other subjects at the State's discretion for all students and all subgroups of students identifies in ESEA section 1111(b)(2)(C)(v)(II):, (2) graduation rates for all students and all subgroups; and (3) school performance and

progress over time, including performance and progress of all subgroups.

Fair Measurements of Adequate Yearly Progress

Minnesota will continue to use its federally approved Adequate Yearly Progress Measures (AYP) measurements to provide Annual Measurable Objectives (AMOs) for all LEAs and schools in the state. Our current AMOs model includes participation on statewide assessments, an index rating for determining proficiency on statewide assessments in reading/language arts and mathematics, and attendance or four-year on-time graduation for the other indicator. Using the same AMOs also allows for continuity between the current and future accountability systems. Targets will be adjusted according to the requirements outlined in Option A. A full discussion of this can be found in section 2.B. of this document.

Annual Measurable Objectives-Progress on each AMOs status component is published annually on the School Report Cards. A link to the Functional Requirements for the 2011 No Child Left Behind Adequate Yearly Progress Calculations, providing a full technical description of these computations, is included as Attachment 15.

Even though the current AMOs system provides disaggregated information in each domain (participation, proficiency, attendance and graduation) for all eight required subgroups the underlying measurements do not include growth or credit for closing the achievement gap. A more complete picture is needed.

Multiple Measurements of School Performance - If approved, Minnesota will add an additional component to the statewide accountability system. A new Multiple Measurements Rating (MMR) will be calculated for each school in the state. The MMR combines four achievement measures to arrive at an overall rating:

- Proficiency
- Individual student growth
- Growth gap reduction
- Graduation rates

A school's performance on these measures is determined by student performance on Minnesota's statewide assessments in math and reading and the four-year on-time cohort graduation rate. This new rating is centered on what stakeholders deem to be the four most important factors in a school's success. If approved Minnesota's school accountability profile for the 2011-2012 school year will add the MMR to the accountability data it currently provides on an annual basis. A district's accountability profile will continue to show only the AMOs.

The MMR is based on state assessment data and graduation rate computations. It provides textured information to support school improvement activities and focus attention on closing the achievement gap by combining performance and progress measures.

- *Proficiency*
  This domain uses the approved index model which allows for a continued emphasis on the goal of promoting maximum levels of proficiency among students. Schools earn points based on the percentage of measured subgroups that make AYP, with subgroups weighted according to their size. Using the index rating provides continuity between the current and future accountability systems. A more detailed discussion of this calculation can be found in Attachment 15.

- *Growth*
  Parents, teachers, administrators, and policy makers have valid questions about the relative progress of students over time (Smith and Yen 2006). In accordance with NCLB, the Minnesota Assessment System develops and administers criterion-referenced tests aligned to grade-level academic standards. The tests are primarily designed to enable a determination of each student's proficiency level within their grade. Additionally, Minnesota's tests can provide information about students' relative achievement growth over time. Growth modeling represents a cost-effective way to maximize the return on Minnesota's investment in criterion-referenced testing by providing growth information.

Individual student growth is measured using a normative model. Student growth is measured over two consecutive test administrations by predicting a student's second-year score based on the student's first-year score. Each student earns a growth Z-score based on the relation of their second-year score to their predicted second-year scores. Schools earn a growth score based on their average individual student growth Z-scores. The longitudinal data warehouse is used to locate students across the state to maximize the inclusion of data and individuals on this measure. A more detailed discussion of this calculation can be found in Attachment 16.

- *Growth gap reduction*
  Growth gap reduction is focused on students in black, Asian, Hispanic, American Indian, special education, English learners and students qualifying for free or reduced price lunch subgroups.

  Schools receive a score based on the average of individual student growth Z-scores in these seven subgroups compared to the statewide average individual student growth in higher-performing subgroups.

  Growth exhibited by the free or reduced price lunch subgroup is compared to that of non-free or reduced price lunch students. The English learner subgroup is compared to non-English learners. The special education subgroup is compared to non-special education students. Racial/ethnic subgroups are compared to White students.

  By subtracting the statewide mean growth of each higher-performing group from the school's mean growth exhibited by the corresponding lower-performing group the result is a standardized effect size measure of the degree to which a given school closed the achievement gap. Negative values indicate the gap is closing and positive values indicate a widening gap. A student-weighted average of growth gap effect sizes is calculated to determine each schools overall growth gap effect size.

  Each school is then given a percentile ranking based on its contribution to growth gap reduction (i.e., their weighted average of growth gap effect sizes). A more detailed discussion of this calculation can be found in Attachment 16.

- *Graduation*
  The graduation rate is measured using Minnesota's approved, federally-mandated, four-year adjusted cohort formula. A more detailed discussion of this calculation can be found in Attachment 17.

Multiple Measurements Rating (MMR)

Each of the four domains described above is computed individually and is based on two years' worth of data to ensure statistical validity and minimize the effects of small group sizes.

Using the results on each of the four MMR domains, every school earns a percentage based on the points achieved out of the school's possible points. Each domain is weighted equally. Schools can earn up to 25 points in each domain so that schools measured in all four points have 100 possible points. For schools that do not have data in one of the four domains, the total possible points are reduced, placing greater weight on the remaining domains.

A Multiple Measurements Chart will be posted in the school accountability profiles on the MDE website for every school in the state. The chart will show the school's performance on all four domains and its total percentage of points earned out of their possible points. Using the interactive data center on the MDE website, interested members of the public can compare school performance on all four of the domains and on the overall percentage of points earned. An example of the Multiple Measurements Chart can be found below:

DISTRICT: Sampleville SCHOOL: Sampleville Secondary TITLE I: Yes ACCOUNTABILITY STATUS: Reward School		
MEASUREMENT	**POINTS EARNED/POINTS POSSIBLE**	**PERCENTAGE**
Proficiency	25/25	100%
Student Growth	23.7/25	94.8%
Achievement Gap Reduction	22.9/25	91.6%
Graduation Rate	24.8/25	99.2%
Total	96.4/100	96.4%
Statewide Average		58.7%

Minnesota's Technical Assistance Committee (TAC) was consulted during the development of the MMR and was generally supportive. The local member of the TAC participated in the ESEA Flexibility Request Work Group and was also supportive of this methodology.

b. Does the SEA's differentiated recognition, accountability, and support system create incentives and provide support to close achievement gaps for all subgroups of students?

Schools that Need the Most Support in Closing Achievement Gaps

According to the National Assessment of Educational Progress (NAEP), Minnesota students exhibit high levels of achievement compared to other states, but our achievement gaps are among the worst in the nation. Minnesota has one of the largest achievement gaps in the country. Our stakeholder community has sent a clear message that any revisions to the accountability system must focus school improvement around efforts on better serving minority students, students in poverty, English learners and students with special needs. The choice Minnesota made in adjusting the proficiency targets within Option 1 for AMO adjustments will shine a bright light on our achievement gaps.

Even though the current system provides disaggregated information in each domain (participation, proficiency, attendance and graduation) for all eight required subgroups, the underlying measurements do not include growth or credit for closing the achievement gap. A more complete picture is needed.

Growth Gaps- Minnesota's achievement gap reduction measurement used in the MMR is essentially a growth gap measurement that focuses attention on the need to accelerate the growth of lower-performing subgroups in order to close achievement gaps. This measurement will highlight schools that are succeeding in this regard. Within each school, student growth score means are calculated for each of seven, lower-performing subgroups: students eligible for free or reduced price lunch, English learners, special education students, and students identifying as American Indian, Asian, Black, or Hispanic. The growth of each of these groups is compared to the statewide average growth of their higher-performing counterparts. The gap is defined by the difference in growth. Because higher-

performing groups are ahead and growing at faster rates, increasing the growth rates of subgroups to meet or exceed that of high performing groups is necessary to close achievement gaps. Please see Attachment 16 for a summary of Minnesota's achievement and growth gaps.

c. Does the SEA's differentiated recognition, accountability, and support system include interventions specifically focused on improving the performance of English Learners and students with disabilities?

The MMR and Focus Rating both include measures of performance by English Learners (ELs) and students with disabilities. Title I schools can be identified as Focus Schools based on inadequate performance by students in these two subgroups. Additionally, with the implementation of WIDA standards and assessments, MDE will explore new measurements for ELs that reflect time in program in assessing the proficiency and growth of those students. Once data becomes available to adjust the measurements for ELs in this method, MDE will explore the incorporation of it into AMOs, the MMR and the Focus Rating.

When a school is identified as a Focus School as a result of the performance of English Learners or students with disabilities, the school will be expected to perform a full diagnostic review of its instruction and practices with those students to determine the best interventions to meet the unique needs of students in these subgroups. The statewide system of support will facilitate the sharing of best practices for these students to give schools the technical assistance they need to effectively provide high-quality instruction to these students. MDE will also expect Priority Schools to include specific plans for addressing the needs of ELs and students with disabilities in their turnaround plans. Only turnaround plans that specifically address these students will be approved. A more detailed discussion of this calculation can be found in Attachment 16.

d. Did the SEA provide a plan that ensures the system will be implemented in LEAs and schools no later than the 2012-2013 school year?

Minnesota will begin implementing this system of recognition, accountability and support immediately upon federal approval of its ESEA Flexibility Request by publishing a list of Priority, Focus and Reward schools in the winter of 2012. MDE will work with Priority and Focus Schools to develop plans so that they are approved and in place for the 2012-13 school year, during which interventions must begin.

2. B Set Ambitious But Achievable Annual Measurable Objectives

Option A:

Did the SEA set its AMO's so they increase in annual increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient?

i. Did the SEA provide the new AMO's and the method used to set these AMO's?

Minnesota has chosen to reset Annual Measurable Objectives (AMOs) using Option A. We selected this option because it is both ambitious and achievable. Setting different targets for different subgroups reflects the current conditions in classrooms and shines a light on Minnesota's biggest educational crisis: the achievement gap.

By drawing more attention to the current situation and setting an ambitious six-year goal, the hope is that the state as a whole will rally around this goal and continue to make closing the achievement gap a major priority in education. AMOs are used to award points in the proficiency category of the MMR, which gives greater importance to the AMOs and the underlying goal of closing the achievement gap.

Methodology- We used the process in our approved workbook for the approved index system for computing proficiency but revised the index targets. Revised statewide targets were set by using the statewide averages for each grade and subgroup from the 2011 results (See Attachment 8). These values were incremented in equal steps so that there would be a 50% reduction in non-proficient kids by 2018.

50% reduction
((1-[starting index])*0.5)+[starting index]
If .58 was the starting index, they would need to be at .79 by 2018
1.00-.58 = .42
.42*.5=.21
.58+.21 = .79

The Functional Requirements for the 2011 No Child Left Behind Adequate Yearly Progress Calculations" can be found in Attachment 15.

ii. Did the SEA use current proficiency rates from the 2010-2011 school year as the base year?

To generate the new AMOs, Minnesota used the statewide averages on the assessments taken during the 2010-2011 school year for every subgroup at every grade level as the starting points for every subgroup and projected a 50 percent decrease in non-proficiency over the course of six years using equal annual increments.

iii. If the SEA set AMOs that differ by LEA, school, or subgroup do the AMOs require LEAs, schools and subgroups to make greater rates of annual progress?

The effect of this method is that subgroups that currently have a lower rate of proficiency start with lower targets but are expected to make greater rates of annual progress during the six-year period. Within six years, the gap between the lower-performing subgroups and the higher-performing subgroups is cut in half.

2. C Reward Schools

2.C.i Describe the methodology for identifying highest-performing and high-progress schools as reward schools?

Philosophy of Reward School Identification

To understand how Reward Schools are identified, it is important to first understand the purpose that is served by identifying Reward Schools: Incentivizing high performance and progress among Title I schools, and highlighting best practices to be shared with all schools, particularly Priority and Focus Schools. To those ends, the methodology used to identify Reward Schools must identify schools that are performing well in all measurements that are valued by the state and identify school types proportionally.

Methodology- Reward Schools will be identified using the Multiple Measurements Rating (MMR) described in detail in section 2.A.i of this document. Using the top 15 percent of Title I schools will be identified as Reward Schools. These schools will represent the highest-performing elementary schools, middle schools and high schools in the state based on their ability to achieve high rates of proficiency, high levels of growth, growth gap reduction and high graduation rates.

Within the four school classifications of elementary school, middle school, high school, and others, the Title I schools with percentages that fall within the top 15 percent are identified as Reward Schools. The final group of Reward Schools will not be differentiated between highest-progress and highest-performing schools because the MMR captures both performance status using proficiency, and student progress using student growth. Reward Schools will exhibit both high levels of performance and high levels of progress.

This methodology achieves the two goals of identifying Reward Schools by incentivizing schools to perform well on the four measurements that are most valued by the state and creating a group of high-performing schools that is representative of the schools around the state. Using this methodology, the state can incentivize high proficiency and growth while highlighting the best practices from schools around the state.

Recognition- Each year, the Governor and Commissioner of Education will publicly recognize the achievement of the top 15 percent of Title I schools based on their MMR. Public recognition will continue to be the primary reward for these schools. Minnesota is also pursuing funds from the state or private sources to financially support Reward Schools that are willing to partner with low-performing schools to share best practices.

2.C.ii Did the SEA's request identify both highest-performing and high-progress schools as part of its first set of identified reward schools? (Table 2)

We have included a table to identify preliminary Reward Schools (Attachment 9). This list does not disclose the identity of individual schools as the computation is based on preliminary impact data runs. Upon approval of the methodology by USDOE, Minnesota will begin the standard production process to create new annual statewide accountability statistics. The IT development team will use SQL programming to pull data from production warehouse sources creating full functional documentation. Quality assurance routines will be run to verify and validate the computational results. This is the standard methodological process for releasing any statewide high stakes education statistics to ensure validity and reliability of data.

2.C.iii Did the SEA Describe how the SEA will publically recognize and, if possible, reward the highest and high-progress schools?

- *Has the SEA provided a reasonable explanation of why its proposed recognition and where applicable rewards are likely to be considered meaningful by schools? For example has the SES consulted with LEA's and schools in designing its recognition, and where applicable, rewards?*

Minnesota believes the opportunity to identify Reward Schools is one of the most critical elements of its proposed system of recognition, accountability and support. The current AYP system is based mostly on sticks and lacks the carrots

necessary to motivate schools to improve and set ambitious goals that go beyond the AMOs. Reward Schools are the carrot that an effective accountability system must have to motivate high achievement and identify the best practices of schools around the state.

The primary reward for schools will be public recognition. In consulting with stakeholders from schools and LEAs, MDE has gleaned that the most meaningful incentive for schools is the opportunity to have their good work recognized. The SEA will work with LEAs to determine the best methods for publicly recognizing Reward Schools.

Proposed Recognition- At a minimum, Minnesota plans to hold an annual press conference to announce the list of Reward Schools, publish a list of Reward Schools on MDE's website, have the Governor or Commissioner of Education visit Reward Schools to congratulate the students and staff and present plaques or certificates to Reward Schools. LEAs have said that such steps would make the Reward School designation meaningful and motivate schools to set ambitious goals to reach Reward School status.

Stakeholder Input -A lack of state resources at the present time limits MDE's ability to provide additional rewards to Reward Schools, but over time MDE hopes to develop ways to provide financial and other incentives to Reward Schools. One way the MDE hopes to provide financial rewards is by securing a funding source, either through private donations or repurposing of state funds, to provide financial incentives to Reward Schools that are willing to partner with Priority or Focus Schools to share best practices.

Stakeholders from around the state have expressed support for this idea and principals and superintendents have expressed a willingness to participate in such partnerships if financial restitution was available for those Reward Schools willing to have personnel take time to work with Priority and Focus Schools. Experience has shown that collaboration between educators is one of the most effective ways to improve performance and create a better academic environment for students, so finding a way to provide financial incentives to help Reward Schools that are willing to share their best practices with other schools holds great promise for improving the academic achievement of schools statewide.

Another preference expressed by stakeholders and LEAs that will not require additional resources is to have Reward Schools audited so MDE can share with leaders and instructors at Reward Schools which of their practices are most effective. This audit would be provided at no cost to the Reward School or its LEA and could be used by the school to assess what it is doing well and how it could continue to improve. The results of the audit would also increase the capacity of MDE to assist other schools by highlighting practices that work best in promoting high academic achievement. MDE would use the results of such audits to create an online clearinghouse of information on best practices that schools around the state could access.

2.D Priority Schools

2.D.i Did the SEA describe its methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as Priority Schools ?

Philosophy of Priority School Identification

To understand how Priority Schools are identified, it is important to first understand the identification of Priority Schools serves the purpose of identifying the lowest-performing schools so they can implement turnaround principles to fundamentally change the way they operate. It is critical that the methodology for identifying schools is comprehensive and has the necessary legitimacy to justify the severe sanctions they will be required to implement.

Every three years Minnesota will identify 5 percent of Title I schools with the lowest performance. Two groups will be included: those with the lowest MMRs and Tier I School Improvement Grant (SIG) schools that are implementing one of the four turnaround models.

They will take their designation seriously and make the necessary improvements to change the trajectory of the school. Furthermore, the measurements that are used to identify Priority Schools must provide those schools with data they can use to assess their own needs and set improvement goals. Finally, it is also important to ensure that the methodology for identifying the lowest-performing schools is consistent with the methodology for identifying the highest-performing schools so there is continuity within the accountability system.

Methodology

Minnesota plans to achieve these goals by identifying Priority Schools with the MMR. All schools in the state will be measured with this rating and every three years the bottom five percent of Title I schools will be identified as Priority Schools. The inaugural class of Priority Schools will be generated using graduation data from the 2009-10 school year and results from the statewide 2010-11 math and reading assessments.

This methodology achieves the goals of the state by accurately identifying those schools that are not only exhibiting low levels of proficiency, but are also failing to

achieve adequate levels of student growth, are contributing to the state's achievement gap by failing to improve the performance of lower performing subgroups, and are graduating a low percentage of students within four years.

Educators around Minnesota have been asking MDE to use growth for school accountability purposes. A methodology for identifying Priority Schools that includes student growth gives the system greater legitimacy and will create more buy-in for schools that are identified as Priority Schools. This is critical to the success of the system of recognition, accountability, and support because for any turnaround principles to be effective they must be implemented with fidelity. The methodology for identifying Priority Schools ensures that no school identified in this category can make the claim that they do not deserve to be in the Priority School category.

2.D.ii Does the SEA's request include a list of its Priority Schools? (Table 2)

We have included a table identifying Priority Schools (Attachment 9). This list does not disclose the identity of individual schools as the computation is based on preliminary impact data runs. Upon approval of the methodology by USDOE, Minnesota will begin the standard production process to create new annual statewide accountability statistics. The IT development team will use SQL programming to pull data from production warehouse sources creating full functional documentation. Quality assurance routines will be run to verify and validate the computational results. This is the standard methodological process for releasing any statewide high stakes education statistics to ensure validity and reliability of data.

a. *Did the SEA identify a number of Priority Schools equal to at least five percent of its Title I schools?*

During the 2010-11 school year, there were 842 Title I schools, so Table 2 (Attachment 9) of the ESEA Flexibility Request identifies 47 Title I Priority Schools plus an additional eight non-Title I schools due to their School Improvement Grant status.

2.D.iii Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in Priority Schools?

Priority Schools will implement turnaround plans based on the turnaround principles outlined in the ESEA Flexibility guidance. MDE will create diagnostic value-added profiles for Priority School to help identify the root causes of their performance, assess their academic needs, and monitor student improvement. Priority Schools will also have the opportunity to partner with Reward Schools to share best practices and collaborate on school improvement activities. To achieve turnaround, Priority Schools will be required to set aside 20 percent of their Title I funds for state-approved school improvement activities.

a. Do the SEA's interventions include all of the following?

(i) providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;

Performance Reviews to Establish Track Record - MDE will work with each Priority School's LEA to determine if the current principal is an effective leader and has proven to be effective in improving student achievement in a turnaround effort. MDE will require all Priority Schools to adopt an MDE-approved principal evaluation tool that will be utilized to review the performance of the current principal and serve as the basis to replace the principal if the performance measures are not met.

MDE will provide support to Priority School principals by incorporating a turnaround leadership component into the technical assistance provided to the LEA to ensure ongoing measurement of the principal's growth as a turnaround leader. This support will be initiated by MDE staff and a contracted vendor with a track record of providing support to turnaround principals.

Operational Flexibility- Priority School principals will be required to provide regular formative data reports on student achievement to the LEA and MDE to monitor student achievement over time. MDE will work with LEA leadership to increase the operational flexibility for the principal as needed to meet the building's identified needs.

> *(ii) ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;*

All Priority Schools will be required to implement a standards-based teacher evaluation system for all teachers in alignment with the recently adopted teacher evaluation legislation. The system should require three formal observations for all teachers with pre- and post-conferences to provide ongoing coaching and performance review.

The principal in each building will also be required to implement other strategies to monitor and measure teacher effectiveness such as goal-based walk through, teacher sharing of student work portfolios, and other measures of teacher growth. Based on the results of the evaluations, building leaders will make relevant staffing decisions to ensure that teachers are as effective as possible given the needs of turnaround schools.

Each Priority School will develop a School Improvement Plan based on a comprehensive needs assessment and, within the plan, include a detailed professional development program. This program should be grounded in the practice of professional learning communities (PLCs) providing 90 minutes of job-embedded professional development each week to promote teacher learning of need-based instructional strategies and collaboration around student work and achievement.

Professional Learning Communities - PLCs are to be led by identified teacher leaders trained in PLC facilitation and implementation. Principals are an integral component of the PLCs and teacher learning which will be monitored through the teacher evaluations and ongoing observations.

(iii)redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;

Improvement plans will incorporate structures within the PLCs to allow for teacher collaboration time. This will require the school to revisit the weekly schedule and teacher contract to ensure this time is provided.

Increased and extended learning time for students will be encouraged contingent on the completion of a time audit to measure the amount of instructional time that is currently in place for the core subjects and explore possibilities to increase the length of instructional time for all students.

Extended learning opportunities for high-need students should be explored to find researched-based models that can be implemented. Extended learning opportunities should be based on an extension of the core curriculum and instruction and include a system of ongoing measurement of student achievement to determine the effectiveness of the model.

(iv) strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;

MDE will work with the LEAs to ensure that the core curriculum of the school is closely aligned with the Minnesota State Academic Content Standards through a review process of each building's operational curriculum. Curriculum audits, mapping and alignment strategies will be part of the technical assistance delivered through the statewide system of support (SSOS). As part of the technical support provided to the district, the professional development that is identified as part of the school's standards-alignment will be provided by MDE staff or resource staff directed by MDE content staff.

Priority Schools' LEAs will also be required to audit any Pre-Kindergarten programming provided by the LEA to ensure that the instruction is high-quality and aligned with K-12 academic standards. If the LEA does not provide Pre-Kindergarten programming, it may choose to use a portion of its school improvement set-aside in order to do so.

> *(v) using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;*

The technical assistance provided through the SSOS will include the use of the state student data repository to mine, disaggregate and analyze the summative student data for the respective buildings. This data will be used to diagnose the areas of student achievement that need to be addressed as part of the needs assessment process and to set goals for student learning. Priority Schools will also be provided with value-added diagnostic tools to identify student needs, plan appropriate instruction and measure progress.

Improvement plans must identify staff who will work directly on data analysis to provide the principal and instructors with data to guide decisions on curriculum, resources and staffing. Technical assistance and training will be provided to ensure that designated staff who are working with data have the knowledge and technical capability to provide high-quality data analysis.

In addition, the PLCs will focus their work around formative data collection at the classroom level (See a. ii above). Student work will be analyzed and compared in on a regular basis to monitor individual student progress toward becoming proficient in the Minnesota State Academic Content Standards. This process of formative assessment will be standardized through the technical assistance model of the SSOS and monitored on a regular basis by MDE and the LEA.

> *(vi) establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and*

As part of the school's needs assessment, factors impacting school safety and discipline will be analyzed to determine if the school has the structural components in place to maintain a learning environment that will encourage learning, embrace diversity and provide a nurturing environment for all students. As a result of the needs assessment, MDE will provide guidance to the LEA about what structures and/or personnel would need to be implemented in order for students to have an appropriate learning environment.
In addition to assessing the school environment, Priority Schools will also be provided with an audit of learning time missed as a result of disciplinary actions. MDE analysis has shown that low-performing schools often have higher rates of days missed as a result of student suspension. LEAs in Minnesota that have explored alternatives to suspension have seen observed gains both in academic performance and school environment indicators. Priority Schools will need to explore the viability of such options.

(vii) Providing ongoing mechanisms for family and community engagement?

These schools must go beyond the term, "family involvement." They will need to explore and implement true engagement activities for parents and the community. Parents should be involved in the curriculum review processes, provide insight and feedback into what makes a safe school environment for their children, and assist in the classroom and at school events to become part of the school community. Schools that have difficulty engaging parents will need to develop strategies to reach out to families and meet them "on their turf" and address topics from their perspective. The Statewide System of Support (SS0S) will provide resources and strategies to enhance the school's parent and community engagement practices.

Schools need to reach out to the greater community to engage members in school events such as inviting service clubs and businesses into the school to assist with parent nights, student sports or music and theater performances. These "points of engagement" for community members are critical. Schools with significant minority populations will need to work directly with representatives of those populations to ensure parent and community engagement. Finally, each

school will be provided guidance in creating service opportunities for students with in the greater community to provide relevant service and build strong bonds to community members and entities.

a. Has the SEA identified practices to be implemented that meet the turnaround principles and are likely to —

(i) increase the quality of instruction in Priority Schools ;

MDE is currently in the process of redesigning its NCLB AYP Statewide System of Support to better respond to the needs schools in a more efficient and timely manner. MDE has reviewed best practices in SSOS support as well as the successful strategies and practices gleaned from research and the administration and support of the School Improvement Grant (SIG) program in Minnesota. These will be incorporated in the supports provided to Priority Schools.

(ii) improve the effectiveness of the leadership and the teaching in these schools; and

This system will be rooted in strong leadership and effective teachers as well as appropriate use of data and improved instruction and student support. The system will link classroom instruction to a cohesive support network, resulting in detectable instructional changes in every classroom and measureable teacher and student achievement growth. The plan will include:

1. Strong Leadership supported by:
   - Effective strategies to recruit, replace and/or retain skilled staff
     - Turnaround leader selection processes
     - Turnaround leader competencies
   - Rigorous evaluation system
   - Effective evaluation/observation
   - Operational flexibility
     - Provide criteria to recruit, screen, select and evaluate external providers

- Effective governance structure
  - Leadership team development

2. Effective Teachers supported by:
   - Effective strategies to recruit, replace and/or retain skilled staff
     - Turnaround teacher selection processes
     - Turnaround teacher competencies
   - Rigorous evaluation system
     - Effective evaluation/observation

3. Appropriate Data Use supported by:
   - Continuous use of student data to improve instruction
     - Systemic needs assessment support
     - Root/cause analysis
     - Setting effective SMART goals
     - Focused intervention planning
     - Classroom formative assessment support (provide feedback to students and teachers and increase student involvement in learning)
     - Benchmark assessment support (measure student growth of the standards-based instructional program)

4. Improved Instruction supported by:
   - Increased learning time
     - Maximize the effectiveness of current instructional time Link increased time to core content
     - Extended-day learning opportunities
   - Research-based, vertically-aligned MN standards-aligned instructional program
     - Standards alignment supported with rigorous instruction
     - Formative instruction support
   - Professional learning communities
     - Protocols

- Time and resources

5. Student Supports Strengthened by:
   - Providing social-emotional and community-oriented services/supports
   - Engaging parents and community to support student achievement

(iii) Improve student achievement and, where applicable, graduation rates for all students, including English Learners, students with disabilities, and the lowest-achieving students?

Priority Schools will be expected to address the needs of specific subgroups, including ELs and students with disabilities, in their improvement plans. The SSOS will work with schools to disaggregate data with the goal of identifying subgroups that need intensive academic supports.

Once particular subgroups are identified, the SSOS will assist the school and LEA in identifying strategies that have a record of success in improving the academic achievement of students in those subgroups. Schools can draw on the best practices identified at Reward Schools with similar demographics. Schools will also be expected to work with the community to identify culturally-relevant academic programming to address the needs of lower-performing subgroups. Schools with low-performing ELs and students with disabilities will review the curriculum and programming used for these students to identify flaws and steps that can be taken to address them.

b. Has the SEA indicated that it will ensure that each of its Priority Schools implements the selected intervention for at least three years?

MDE will develop an ongoing system of accountability for the Priority Schools that will measure fidelity of implementation of the interventions based on the Minnesota Common Principles of Effective Practice (CPEP). In addition, MDE will

engage in ongoing monitoring of the schools PLCs, the teacher observation system and the formative data gathering by the building to measure student achievement. These elements have all been incorporated into the SSOS described above.

2.D.iv Is the SEA's proposed timeline for ensuring that LEAs that have one or more Priority Schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014-2015 school year reasonable and likely to result in implementation of the interventions in these schools?

- *Does the SEA's proposed timeline distribute Priority Schools ' implementation of meaningful interventions aligned with the turnaround principles in a balanced way, such that there is not a concentration of these schools in the later years of the timeline?*

MDE's support model described above will be implemented consistently across all Priority Schools to ensure that there are not discrepancies in the type and duration of interventions that schools are incorporating at any given time. Each school will go through the data analysis, goal-setting, PLCs and teacher observation system implementation, curriculum alignment, instructional time audit and determination of professional development goals and focus for each year in a systematic manner with oversight by SSOS facilitators.

By applying for the NCLB waiver in November of 2011, MDE will have ample time to lay out the expectation and processes for Priority Schools so that when the waiver is approved, the identified schools can be contacted in the spring of 2012 and planning can commence to ensure an effective and efficient implementation of the intervention in the fall of 2012. All Priority Schools will implement all of the turnaround principles by no later than the start of the 2014-15 school year.

2.D.v Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?

a- Do the SEA's criteria ensure that schools that exit priority status have made significant progress in improving student achievement?

Any exit criteria for Priority Schools have to be meaningful enough to ensure that a school that exits Priority status has permanently altered its trajectory. With that standard in mind, Minnesota will only allow Priority Schools that finish outside of the bottom quartile of Title I schools statewide for two consecutive years, using performance on the MMR as the criteria.

Sufficient Time

Minnesota's experiences in working with schools in the School Improvement Grant (SIG) program have shown that meaningful turnaround takes at least two years. Therefore, a school identified as one of the most-persistently low-performing in the state must work with MDE for at least two years to permanently change direction and achieve genuine success in turning around.

It is clear from the preliminary impact data that MDE has examined that the difference between the bottom five percent of performers on the MMR and those above of the bottom quartile is such that two consecutive years above the bottom quartile will be evidence of genuine improvement for a Priority School. Because the MMR is a comprehensive and robust measurement tool, in order to move up in the statewide rankings enough to move from the bottom five percent to above the bottom quartile will be an indicator that the school has made systemic improvements.

Consistency

Using this methodology provides consistency across the accountability system. The selection process for Priority Schools is normative, so it is only appropriate that the exit process should be normative as well. Schools are identified as Priority Schools based on their performance relative to other Title I schools. Similarly, Priority Schools should be exited from their status if their performance relative to other Title I schools improves substantially over the course of two years. Also, with the 25 percentile being used as an indicator for continuous improvement, using this line as the cutoff for exiting Priority Status provide clear benchmarks for all schools.

Resources

The logic behind selecting a small group of Priority Schools is that with limited state and federal resources, the most focused attention should be paid to those schools that are truly at the bottom of the state in terms of academic performance. By allowing Priority Schools that move out of the bottom quartile of Title I schools to direct their own improvement efforts, MDE can maintain a focus on those schools that are truly most in need of support.

Meaningful

The difference between the bottom five percent of MMR performers those outside of the bottom quartile is such that two consecutive years outside the bottom quartile will be evidence of genuine improvement for a Priority School.

Two Exceptions

Two exceptions will be made for the exit criteria. The first is directed at Priority Schools identified because of their status as SIG schools. Minnesota currently has 19 schools implementing one of the four SIG turnaround models. These schools are automatically identified as Priority Schools. However, because these schools have been implementing the turnaround models for multiple years, they will have the opportunity to exit Priority status if their performance on the MMR during their final year of SIG status puts them above the bottom 25 percent of Title I schools. This will allow MDE to focus resources on those schools that are most in need of support rather than to spread resources more thinly to include SIG schools that have already made real strides in changing direction.

The second exception applies to all Priority Schools. Any Priority School that attains Reward School status can immediately exit Priority status. Because the criteria for the Priority and Reward Schools is the same, moving from the bottom five percent of Title I schools to the top 15 percent would be an indication of remarkable progress. Any school that could achieve this type of progress will have clearly made the necessary changes to alter the trajectory of the school in a way that ensures sustained improvement.

2.E Focus Schools

2.E.i Did the SEA describe its methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as Focus Schools?

Philosophy of Focus School Identification

The identification of Focus Schools to is meant to shine a bright light on the achievement gap while identifying Title I schools that are most in need of support in improving the academic performance of low-performing subgroups. Some of these schools will have wide within-school achievement gaps, a subgroup or subgroups that are falling behind students around the state or both.

By identifying Focus Schools based on schools' contributions to the statewide achievement gap, the state can incentivize schools to thoughtfully and aggressively address the academic performance of subgroups that have typically performed poorly on the statewide math and reading assessments. For those schools that are unable to promote higher achievement by these subgroups, the identification as a Focus School is an opportunity for the state to intervene and put practices into place that can assist the school in addressing their specific problems.

Methodology – Modified Proficiency and Growth Gap

Focus Schools are those with specific achievement gap issues. They will be identified once every three years using a modified version of the MMR called the Focus Rating centered exclusively on lower-performing subgroups. The rating will measure growth and proficiency for the following sub-groups:

- Black
- Hispanic
- Asian,
- American Indian,
- English learners
- Free/Reduced Price Lunch
- Special Education

Focus Rating- Proficiency Status

To identify Focus Schools, proficiency is calculated using the approved AYP Proficiency index model. However, unlike the proficiency index model, the focus rating will only allow schools to earn points based on the percentage of just the seven groups noted above that make AYP. This percentage is weighted based on the number of students in of each group. A more detailed discussion of this calculation can be found in Attachment 15 or in section 2.A.1.a.

Focus Rating – Growth Gap Reduction

The growth gap measure used in the Focus rating measures achievement gap reduction measurement used in the Focus Rating is the same as the achievement gap reduction domain in the MMR. A description of the methodology for calculating this domain can be found in 2.A.i.a.

Points for proficiency and growth gap reduction are summed and divided by the total possible points to generate a combined percentage of points for each school. The bottom 10 percent of Title I schools on these combined measurements that have not already been identified as Priority Schools are designated as Focus Schools. Once the list is complete, Title I schools identified as Focus Schools for graduation rate purposes are added in and an equal number of schools from the original Focus School list are removed so the resulting number of Focus Schools is equal to 10 percent of Title I schools. Based on the number of Title I schools in 2011 the attached list includes 84 Focus Schools.

Title I schools with Graduation Rates Under 60 Percent.

In addition to schools contributing to the achievement gap, Title I high schools with graduation rates of less than 60 percent will also be identified as Focus Schools. Schools that are not graduating at least 60 percent of their students need to identify the root causes of the problem and address them in ways that work for their student population. Identifying those schools with graduation rates of less than 60 percent as Focus Schools incentivizes schools with low graduation rates to address the problem and allows the state to identify schools most in need of support.

For the purposes of identifying Focus Schools due to graduation rates of 60 percent or less, Minnesota will use a six-year adjusted cohort rate methodology,

pending final federal approval of this methodology. Minnesota is currently in the process of earning final approval for this methodology from the US Department of Education. The attached list reflects the six-year adjusted cohort rate but would be altered to reflect the four-year rate if the state's six-year methodology has not been approved before the ESEA Flexibility Request is granted.

The six-year adjusted cohort rate would be used in order to generate a list of schools that are truly failing to graduate a high enough percentage of students. Minnesota is fortunate to have a number of charter schools that operate in a manner similar to Alternative Learning Programs. The charter schools work exclusively with students who at risk for dropping out. While their four-year graduation rates may not exceed 60 percent because they are working with students who are often multiple grades behind their cohort, this is not necessarily an accurate reflection of the school's success in graduating students. Using the six-year rate allows the state to avoid misidentifying schools that have unique situations.

The state also looks at three years' worth of data in determining graduation rates for the purpose of identifying Focus Schools. Only those schools with a three-year average of less than 60 percent on the six-year adjusted cohort graduation rate are identified as Focus Schools. This protects against misidentifying small schools with wide statistical variations in graduation rate from year-to-year.

This methodology for identifying Focus Schools achieves the goals of closing the achievement gap, identifying schools that are contributing to the state's achievement gap so they can work with the statewide system of supports (SSOS) to address their situation, and identifying so-called dropout factories so they can implement plans to improve their graduation rates. Using this methodology, the state can accurately diagnose problems within schools and incentivize improvement

2.E.ii Did the SEA include a list of its Focus Schools? (Table 2)

We have included a table identifying preliminary Focus Schools (Attachment 9). This list does not disclose the identity of individual schools as the computation is based on preliminary impact data runs. Upon approval of the methodology by

USDOE, Minnesota will begin the standard production process to create new annual statewide accountability statistics. The IT development team will use SQL programming to pull data from production warehouse sources creating full functional documentation. Quality assurance routines will be run to verify and validate the computational results. This is the standard methodological process for releasing any statewide high stakes education statistics to ensure validity and reliability of data.

a. Did the SEA identify a number of Focus Schools equal to at least 10 percent of the State's Title I schools?

During the 2010-11 school year, there were 842 Title I schools, so Table 2 of the ESEA Flexibility Request identifies 85 Focus schools.

b. In identifying Focus Schools, was the SEA's methodology based on the achievement and lack of progress over a number of years of one or more subgroups of students identified under ESEA section 1111(b)(2)(C)(v)(II) in terms of proficiency on the statewide assessments that are part of the SEA's differentiated recognition, accountability, and support system or, at the high school level, graduation rates for one or more subgroups?

As described above, the Focus Ranking and Focus graduation rate both use student data from multiple years, including proficiency on the statewide assessments. Please see Attachment 9 for a graphical summary of measures that were used to identify Focus Schools. Additionally, please see Attachment 16 for a summary of achievement and growth gaps.

2.E.iii Did the SEA describe the process and timeline it will use to ensure that each LEA identifies the needs of its Focus Schools and their students and provide examples of and justifications for the interventions the SEA will require its Focus Schools to implement to improve the performance of students who are furthest behind?

The SSOS as described in the previous section (2.D.iii) will also have the responsibility of providing the technical assistance and support to the identified

Focus Schools. The SSOS facilitators will work with Focus Schools and their LEAs to identify the needs of the school based on the issue that caused the school to be identified. This will involve interventions tailored to the needs of subgroups failing to meet proficiency and growth expectations, and interventions aimed at improving graduation rates. To close achievement gaps, Focus Schools will be required to set aside 20 percent of their Title I funds for state-approved school improvement activities.

Utilizing the data-driven decision-making model that is embedded within the SSOS, the first activity that the school will engage in is the disaggregation and analysis of the achievement data that were used as identifiers. Once causes of the achievement gap or low graduation rate are determined subsequent goals will be set. The SSOS will use the following supports to promote effective data use:

- Continuous use of student data to improve instruction
- Systemic needs assessment support
- Root/cause analysis
- Setting effective SMART goals based on the subgroup's specific needs
- Focused intervention planning by the LEA and SEA, employing resource staff versed in culture, language and environmentally specific interventions
- Classroom formative assessment support (provide feedback to students and teachers and increase student involvement in learning)
- Benchmark assessment support (measure student growth of the standards-based instructional program)

Utilizing best practices that have been identified through research and MDE's experience working with SIG Schools, the SSOS will assist Focus Schools in developing interventions that address the unique needs of the subgroup or subgroups for which they were identified. For example, experience in working with schools that have significant American Indian populations has shown that implementing culturally-specific curriculum built around the traditions of the community can yield positive results for those students.

The SSOS will assist Focus Schools that are identified due to the performance of ELs or students with disabilities in addressing the needs of those students. For ELs, the SSOS will train EL instructors on the new WIDA standards and how to use data from WIDA assessments to tailor instruction to student needs. For Focus Schools identified for the performance of students with disabilities, the SSOS will work with the school to identify the types of special education services that these students need to improve their academic performance.

Regardless of which subgroup is identified, it will be critical that the Focus School engage the parents and community members of the subgroup as it crafts a plan to improve student achievement. Interventions should reflect the expressed preferences of the parents and community so that the school has the support of these key stakeholders. If there are community-based groups that have a proven record of success in working with specific populations of students to improve academic achievement, the LEA should consider contracting with them to provide student services that complement the academic programming at the school.

For all Focus Schools, the SSOS will take advantage of the best practices identified in Priority and Celebration Schools. MDE will analyze the enrollment data from Reward and Celebration Schools (See section 2.F) to identify those schools that are having success with lower-performing subgroups. Audits of these schools will identify best practices that can then be applied at Focus Schools with similar student populations.

- *Has the SEA demonstrated that the interventions it has identified are effective at increasing student achievement in schools with similar characteristics, needs, and challenges as the schools the SEA has identified as Focus Schools?*

Based on the support provided to the current SIG Schools as well as the experiences in schools that have been re-structured under NCLB that have similar achievement challenges at the subgroup level, MDE has developed a cadre of interventions that can be employed to address the specific needs of the Focus Schools. In addition to the standard resources employed by MDE, additional resources will be leveraged to assist schools in addressing subgroup achievement gaps and/or graduation rates.

<u>Partnerships</u>

MDE will be creating partnerships with ethnic and racial advocacy organizations, private corporations and other entities to partner in the efforts to address cultural, family and racial elements that may be contributing to the achievement gap. MDE is currently in the process of working with advocacy organizations around the state to ensure that the SSOS incorporate culturally-relevant and -specific practices. The partnerships being formed in this process will prove invaluable as MDE works with Focus Schools to address low subgroup performance.

Math and Reading Specialists

The SSOS will employ the services of math and reading specialists that will be available to work with teaching staff to implement culturally-responsive teaching strategies that will have a significantly positive impact on the instructional processes in the classroom. In addition, MDE will offer the opportunity for Focus Schools to partner with Reward Schools that have reached high levels of student achievement with similar characteristics, needs, and challenges in order to learn from their successful programs.

- *Has the SEA identified interventions that are appropriate for different levels of schools (elementary, middle, high) and that address different types of school needs (e.g., all-students, targeted at the lowest-achieving students)?*

Interventions will be determined through precise data analysis to determine root causes and subsequent interventions that address the students at their current level of learning and accelerate them to grade-level proficiency. The SSOS does will continue to provide differentiated technical support not only to schools with diverse student populations and needs but also at the appropriate grade configurations. The interventions will be not only appropriate for skill level but will also take into consideration the cultural, social and emotional level of the students served.

An example of an intervention for secondary schools will be to implement a set of diagnostics to determine the level of college- and career-readiness of students through the use of data and reports from the EXPLORE, PLAN, and ACT assessments to provide feedback and guidance for students and their parents in preparation for graduation and the work force. By creating opportunities for

students to explore their interests and skills at an earlier age and by offering scaffolded curriculum and learning experiences to help them reach their goals, a culture of self-worth, success, and hope for their future can be fostered in middle and high school students.

The SSOS will also provide technical assistance specific to high schools with graduation rates of 60 percent or less. In recent years MDE has developed tools to improve graduation rates. One lesson that will be applied to Focus Schools is the need for early identification. Through Minnesota's Early Indicator and Response System (MEIRS), schools can identify students at-risk for dropping out and develop student-specific strategies for keeping all students on track to graduate. All Focus Schools identified for low graduation rates will be expected to utilize MEIRS.

2.E.iv Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

a. Do the SEA's criteria ensure that schools that exit focus status have made significant progress in improving student achievement and narrowing achievement gaps?

Any exit criteria for Focus Schools has to be meaningful enough to ensure that a school that exits Focus status has permanently altered its trajectory and is on track to close, rather than expand, the achievement gap. With that standard in mind, Minnesota will only allow Focus Schools that finish above the bottom quartile of Title I schools statewide for two consecutive years, using performance on the growth gap reduction measurement as the criterion.

Focus Schools are identified based on their performance on the growth gap reduction measurement. This measurement compares the growth of disadvantaged subgroups within a school to the average growth of advantaged subgroups statewide. Those schools whose growth among disadvantaged subgroups is lower than the average growth of advantaged subgroups statewide are contributing Minnesota's achievement gaps, and the lowest-performing on this measurement are making the largest contribution. The consequence of this performance is identification as a Focus School. To exit this status, the

expectation is that a school will make enough progress to finish above of the bottom quartile of Title I schools on the achievement gap measurement.

Ambitious Goals for Low Achieving Students

Schools that are in the bottom ten percent of Title I schools on the achievement gap measurement are exhibiting extremely low student growth among their disadvantaged subgroups. To move out of the bottom ten percent and above the bottom 25 percent will require a major effort to improve the student growth of students in disadvantaged subgroups that will result in fewer students in those subgroups falling behind their more advantaged peers. Schools that are able to achieve this goal will have made the kind of progress the Focus School designation is designed to prompt.

Achievable Goals

In many schools that will be identified as Focus Schools, the group of students whose academic performance is causing the designation is small enough that smart, focused interventions can have an immediate impact on the school's performance on the Focus Rating. Furthermore, because the growth gap reduction measurement is based on growth instead of proficiency, Focus Schools with students who have fallen well behind the standard for proficiency can still get credit for achieving a high level of individual student growth among students in disadvantaged subgroups. By setting an achievable goal, Minnesota can achieve the kind of buy-in it will need from identified Focus Schools to achieve meaningful progress in closing the achievement gap.

Resources

This standard is consistent with the logic behind identifying a manageable-sized group of Priority Schools for the SEA to support. By limiting the size of the Focus School group to ten percent of Title I schools, MDE can efficiently direct its resources to those schools making the biggest contribution to the achievement gap. Similarly, by allowing those Focus Schools that have made major strides in closing the achievement gap to direct their own improvement activities, MDE will be able to focus resources on those Focus Schools that are most in need of support.

Graduation Rates

Some Focus Schools are identified because of their graduation rates rather than their performance on the growth gap reduction measurement. For those schools to exit Focus status, they must have a graduation rate of greater than 60 percent for two consecutive years and show at least a five percentage point improvement in graduation rate in each of those years. By setting these criteria, Minnesota ensures that schools are not only achieving a graduation rate above the level used for identification as a Focus School but also that they have an improved trajectory that will ultimately allow them to achieve a graduation well above 60 percent.

2.F Provide Incentives and Support for Other Title I Schools

2.F Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

Differentiated Recognition Accountability and Support for Title I Schools

Minnesota will use the MMR to further differentiate recognition and accountability for Title I schools. In addition to Reward, Priority and Focus schools Minnesota will identify some additional Title I schools for *Celebration* and *Continuous Improvement*.

Celebration Schools

In order to create further incentives for high-performing Title I schools, Minnesota will solicit applications from the 25 percent of schools immediately outside the top 15 percent based on the annual MMR to apply for Celebration School status. Each year, these schools may submit applications outlining the reasons they should be considered Celebration Schools.

The primary criteria for awarding Celebration School status will be performance on statewide assessment and graduation rates but schools may also reference more qualitative data such as rigorous course-taking data, college placement statistics and participation on the ACT, PLAN or EXPLORE tests. The SEA will review applications and interview applicants to identify an additional 10 percent of Title I schools to be identified as Celebration Schools. The application and interview process will allow applicants to examine their best practices and identify areas where they can make improvements to move into Celebration or Reward status in the future if their applications are unsuccessful.

Continuous Improvement Schools

Each year, all Title I schools with MMRs in the bottom 25 percent will be identified as Continuous Improvement School. Title I schools falling into this category that are not already Priority or Focus Schools will be expected to work with their LEA

to perform a needs assessment or self-evaluation and complete a school improvement plan. These schools can access technical support from the state if needed. MDE will audit a random 10 percent of improvement plans created by schools in the Continuous Improvement category to ensure fidelity.

Note: In accordance with state law (Minn. Stat. 120B.35, Subd. 2), all Title I schools that fail to make AYP for two consecutive years must write a school improvement plan. These schools will also continue to have access to support and technical assistance from the SEA. The SEA will audit a random 10% of improvement plans created by schools in the Continuous Improvement category and Title I schools failing to make AYP for two consecutive years to ensure fidelity with requirements.

School Report Cards

MDE will incentivize continuous improvement at all schools, including Title I schools, by improving both the quality and quantity of data provided on annual school report cards. The school report card of every school in the state will display the Multiple Measurements Chart to indicate performance in each of the four domains and an overall percentage of points earned. This will supplement the current AYP data, which will continue to be posted as part of the school report card.

MDE is also in the process of collecting and reporting new data as part of its longitudinal data system. MDE will soon begin reporting data on rigorous course-taking and postsecondary enrollment. This qualitative data will supplement quantitative data provided through the MMR and AMOs.

All of this data will be easily accessible through MDE's new website data center. This data center will launch in December 2011, and will allow users to compare the data sets of multiple schools. The data center is divided for easy use by three user types: parents, educators and power data users. The data center will be a crucial tool for holding schools accountable through robust reporting of student achievement data.

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Is the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, likely to succeed in improving such capacity?

a. Is the SEA's process for ensuring timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and Focus Schools likely to result in successful implementation of these interventions and in progress on leading indicators and student outcomes in these schools?

Please refer to the explanation of the SEA's Statewide System of Support (SSOS) in the above section (section 2.D.iii.b). The primary goal of Minnesota's SSOS is to focus schools and districts on closing the persistent achievement gap between high- and low-performing children, especially the achievement gaps between minority and nonminority students and between disadvantaged children and their more advantaged peers.

Timely and Comprehensive Monitoring

Minnesota' SSOS will provide effective technical assistance, thus creating a platform for disseminating and reinforcing the use of effective, research-based instructional strategies and evidence-based practices. In addition, MDE must ensure that these schools and districts provide job-embedded professional development that increases teachers' knowledge of the academic subjects they teach, provide in-depth training in math and reading, (including an emphasis on PreK-3 literacy), support the use of effective, scientifically-based instructional strategies with a diverse range of students, and train teachers to analyze classroom and school-level data to inform their instruction.

- *Did the SEA describe a process for the rigorous review and approval of any external providers used by the SEA and its LEAs to support the implementation of interventions in priority and Focus Schools that is likely to result in the*

identification of high-quality partners with experience and expertise applicable to the needs of the school, including specific subgroup needs?

Minnesota recognizes the need to improve achievement for all students and accelerate gains for those who lag behind. In reorganizing the technical assistance for Priority and Focus Schools to address this priority, MDE has established a tiered Statewide System of Support by providing services through partners such as higher education institutions, education districts, service cooperatives or other established providers of school improvement services in Regional Centers of Excellence supported by cross-agency implementation teams from MDE. These partners and any vendors utilized to deliver services will be vetted by the SEA program staff through application review and personal interviews. External providers will need to meet high standards of past experience and success with turnaround schools as well as demonstrate their capacity to provide such services. All grant and contract decisions for services and facilitation of programming will be made by SEA program staff. The aims for this partnership for delivery of services will include:

- Build the capacity of instructional leadership teams in schools to successfully guide the process of continuous improvement

- Implement scientifically-based strategies that will help build sustainable capacity for dramatically improving teaching and learning in Title I schools and districts

- Provide collaborative support for Title I schools and districts to develop a framework for analyzing data, identifying underlying root causes and scaling up best instructional practices to ensure the academic achievement of all students

This tiered system of support will provide regional support to Priority and Focus Schools on an ongoing basis, delivering technical assistance through a network of content specialists, implementation facilitators and professional development providers supported by cross-agency implementation teams. The facilitators in each of the regional centers will have regular contact with the principals and LEAs leaders of the identified schools to monitor the progress towards established

school goals. The SEA will utilize an online system for monitoring the progress that schools are making in the areas of educator and student performance

b. Is the SEA's process for ensuring sufficient support for implementation in Priority Schools of meaningful interventions aligned with the turnaround principles (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources) likely to result in successful implementation of such interventions and improved student achievement?

Funding Options

This system promotes school-wide reform and the access of all children to effective, scientifically-based instructional strategies and challenging academic content. This system also aims to elevate the quality of instruction by providing staff in identified Priority and Focus Schools with substantial opportunities for professional development. The SSOS professional development plans will include differentiated support for principals of the schools from strategies for Turnaround leaders to instructional leadership to leadership in targeted Areas (EL, Special Education, Literacy, Math etc.). These activities will be supported through Title I funds set- asides and other federal funding resources for implementation of the intervention strategies as proposed earlier in this waiver application. These processes have a proven track record and were previously supported by required reserves under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with state and local resources.

c. Is the SEA's process for holding LEAs accountable for improving school and student performance, particularly for turning around their Priority Schools, likely to improve LEA capacity to support school improvement?

The LEAs will be held responsible for the implementation of the improvement plans in the schools through regular interactions with LEA leaders, required reporting of student progress and program fidelity measurements as evidenced through progress made towards both leading and eventually, lagging indicators.

The SSOS will provide direct supports to LEAs and hold them accountable for effectively implementing improvement plans in identified schools

New Jersey

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

2.A Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

I. Introduction

The core goal of the NJDOE is to ensure that all children, regardless of life circumstances, graduate from high school ready for college and career. Currently, the Department is far from accomplishing this mission.

While in the aggregate New Jersey's students perform at nation-leading levels, the state has a number of troubling deficiencies. On the 2011 National Assessment of Educational Progress (NAEP) exam, New Jersey ranked 50 out of 51 states (including DC) in the size of the achievement gap between low and high-income students in 8th grade reading. Tens of thousands of children attend schools where only a minority of students meets basic levels of proficiency in reading and math. Across the state, over 40 percent of third graders are not reading on grade level. And perhaps most alarmingly, a distressingly high percentage of those who do graduate from high school are unprepared for success: nearly 90 percent of students entering some of New Jersey's community colleges require remediation.

New Jersey has a comprehensive strategy for solving these challenges. It begins with an unwavering commitment to the highest expectations for all students and a single-minded, measureable goal of ensuring all students leave high school with the skills and knowledge needed to succeed throughout life which, for us, means truly prepared for college and career. While the NJDOE celebrates its successes, the Department must also honestly acknowledge the massive improvements that must be achieved to meet our ambitious goals. The NJDOE intends to close the achievement gap so student performance is no longer a function of demographics while simultaneously pushing New Jersey's highest performing students to compete with and exceed the accomplishments of their excelling peers in other states and across the globe.

In this context, New Jersey has undertaken an aggressive reform strategy to ensure the state invests in the activities that have the greatest impact on student performance, districts and schools have the information and tools to constantly improve, and that cut the bureaucratic red tape preventing schools and districts from being able to innovate and drive student achievement.

The NJDOE took its first step toward this end during the spring of 2011, shortly after Acting Commissioner Chris Cerf joined the Department. The NJDOE conducted a survey of the nearly 600 district superintendents across the state to learn how successful the NJDOE had been historically in

supporting district work and, more generally, advancing student achievement. The results were eye-opening and discouraging: the superintendents responded clearly that the NJDOE was not an engine for change and improvement in the state. Moreover, respondents said that many of the Department's district-level activities were uncoordinated, that the NJDOE was overly focused on compliance (inputs) rather than performance (outputs), and that its work to improve instruction was particularly lacking.

As a result, Acting Commissioner Cerf reorganized the NJDOE to ensure it was designed to meet its primary obligation of supporting student achievement. The new NJDOE is built on four building blocks:

> **Academics**: Ensuring all schools adhere to challenging content standards, administer rigorous assessments specifically tied to college and career readiness, and have access to high-quality curricula and instructional supports
>
> **Performance:** Overseeing a unified academic accountability system that accurately measures school and district performance and triggers high-impact, tailored interventions and supports
>
> **Talent**: Ensuring that all New Jersey educators are effective by improving policies and practices related to recruitment, preparation, evaluation, compensation, development, retention, and recognition
>
> **Innovation**: Identifying, recruiting, incubating, and supporting diverse, high-quality delivery systems for K-12 education, especially in our persistently lowest-performing school communities

In October, the Department took the second step in its reorganization by creating seven field-based RACs staffed by master educators and designed to provide comprehensive support to schools and districts, with a particular focus on our persistently lowest-achieving schools. The RACs will be instrumental in the Department's execution of its interventions, working closely with the Department's senior leaders to ensure that statewide initiatives are implemented, school and district performance targets are established and met, and high-impact supports are developed and delivered. RACs will be fully functional by the Fall of 2012 to help lead the state's work with schools and districts.

While the Department worked to ensure it was structured to better support schools and districts, it was simultaneously pursuing a wide array of activities aligned with its four building blocks and designed to drastically increase college- and career-readiness. This waiver application—and the new accountability system it will enable—is an essential component of the NJDOE's comprehensive strategy for improving student learning and closing the achievement gap across the State.

As outlined in Section 1 of this application, the State adopted the CCSS and joined the PARCC consortium to ensure the NJDOE aligns its understanding of what K-12 students should know and be able to do with the rigorous expectations of higher education and the workplace. Through the development of model curricula, formative assessments, instructional supports, leadership development activities, and much more, the NJDOE is working to ensure all districts and schools are prepared for the transition to CCSS and PARCC and, as a result, that all students are college- and career ready upon graduation from high school.

As a supporting initiative, the NJDOE also convened a College- and Career-Ready Task Force bringing together K-12, higher education, and business leaders to build consensus among all relevant stakeholders about what knowledge and skills students need when they leave secondary education. This task force is informing the state's work on high school assessments, educator preparation programs, and more.

As outlined in Section 3, the NJDOE has also taken major steps to ensure every classroom is led by an outstanding teacher. In late 2010, the Governor signed an executive order convening the New Jersey Educator Effectiveness Task Force, which was charged with building a framework for educator evaluations. Its work led to the launch of an eleven-district teacher evaluation pilot during the 2011-12 school year. All participating districts (and the state's SIG schools), are building evaluation systems that are based equally on student performance and teacher practice and that lead to meaningful professional development for classroom teachers.

With concrete plans in place to ensure the NJDOE has high-quality standards, assessments, and instructional supports, and effective teachers are leading our classrooms, it is time to have a nation-leading accountability system to ensure the NJDOE is accurately measuring our performance, making progress with all students, and delivering meaningful interventions. Below, the NJDOE offers a plan for building and implementing this next-generation accountability system, which the Department thinks is essential to advance our work. This ESEA Waiver will facilitate and enable this critical effort.

II. Current Status of Accountability in New Jersey

There are currently two overlapping and often contradictory accountability systems for New Jersey schools. At the federal level, the ESEA - in the current form of the NCLB Act - focuses on schools and districts, as evaluated by absolute student performance on state exams. At the state level, New Jersey's QSAC triennially evaluates districts in five areas with student performance comprising only one of them. Though both systems have virtues, both are also deeply flawed. Each has its own independent weaknesses, and the interaction between the two causes a host of problems.

Unfortunately, QSAC does not advance efforts to drive college- and career-readiness. It prioritizes inputs instead of outputs, placing a premium on districts' submission of reports and faithful compliance to rules instead of the improvement of student learning. QSAC also forces a district to consider many of its activities in isolation, requiring separate reviews for personnel, finance, and governance, when all of this work should be viewed as part of a seamless fabric intended to help students learn. Finally, QSAC generates limited and often unreliable information. In most cases the data gleaned from QSAC does little to help the state facilitate gains in academic achievement, and in entirely too many cases, high-performing districts are said to have deficiencies and tragically low-performing districts receive high scores.

NCLB's limitations are also numerous and widely known. It fails to give schools credit for making progress with students. It over-identifies schools and districts as underperforming. It treats a school struggling with a single subgroup the same as a school that is comprehensively failing its student body. It requires an inflexible set of interventions that are inappropriate for many targeted schools. Finally, its supports and sanctions haven't led to the improvements our students need.

Earlier this year, the Governor issued an executive order establishing New Jersey's Education Transformation Task Force, which was charged with making recommendations on how best to craft a rigorous, transparent, trustworthy accountability system while also freeing the State's educators to innovate and drive achievement. In September, the task force released an interim report focused on the deficiencies of QSAC and NCLB and the myriad regulations that burden our educators, schools, and districts. (See Appendix 4 for the interim report). The task force recommended excising a wide range of unnecessary regulations from New Jersey's codebook and creating a unified accountability system that focuses on what matters most – student achievement. Those recommendations drive the NJDOE's approach to educational accountability, autonomy, and support, and they provide the foundation for this waiver request.

The NJDOE is now building a unified accountability system to modify many aspects of QSAC and NCLB. To fully implement that system and realize its many benefits, New Jersey needs flexibility from many of ESEA's rules. The new system will enable the NJDOE to measure and report on metrics that truly reflect schools' and districts' success in preparing students for college and career; it will allow the Department to categorize schools more fairly and develop supports and interventions carefully tailored to their needs; and it will enable the NJDOE to focus its scarce resources on those schools in a persistent state of underperformance and those where at-risk subgroups are lagging far behind. Finally, it will also allow the Department to better hold districts and schools accountable for results.

As part of this waiver, the NJDOE is able to set rigorous and achievable targets for each school and subgroup. The process to set these targets takes into account individual school and subgroup starting points, and focuses on constant, yearly growth. Those subgroups that are farthest behind require the largest gains each year. This is a significant change from NCLB, where all students were held to the unrealistic expectation of 100% proficiency by 2014.

Despite this difference, the NJDOE maintains its belief that every child in New Jersey, regardless of birth circumstance, can achieve at high levels. By focusing on customized growth at the subgroup level, New Jersey has set an ambitious goal that will help all schools constantly improve. The NJDOE believes that the plan in this application will ensure that every student entering Kindergarten in the 2012-13 school year, regardless of circumstance, will graduate from high school ready for college and career

III. Performance Reports

The heart of New Jersey's new accountability system is the data-rich school- and district-level performance report that provides clear, meaningful information on student performance and college- and career-readiness. They provide numerous measures, targets, attainment and growth metrics, composite rankings, and peer-to-peer comparisons to assist schools and stakeholders to fully understand performance and customize supports and interventions.

New Jersey chose its draft metrics by studying the work of leading states, such as, Florida and Massachusetts, and top school systems, such as Montgomery County, Maryland. A draft performance report is attached to this application (See Appendix 5). It includes not only traditional information, such as grades 3 – 8 reading and math scores and graduation rates, but also includes measures that give a clear

indication of college- and career-readiness, such as AP and SAT scores. The draft performance report also allows observers to compare each school's or district's performance to a group of peers with similar demographics. Finally, the report enables educators and parents to see, at a glance, whether and to what degree each school is meeting its performance targets, including narrowing achievement gaps.

Beginning in January 2012, a workgroup of educators, parents, stakeholders, and school board members will be convened to finalize the set of metrics, their various weights in a composite scoring system, and the formulation of appropriate peer school criteria. A series of public meetings and focus groups will be convened to pilot the reports to ensure they are robust, clear, fair, and useful to the broadest set of stakeholders. Led by the NJDOE's Chief Performance Officer, this work will conclude by the end of the 2011-2012 school year; the finalized performance report will be introduced for the 2012-13 school year.

As part of the School Performance Report, each school's designation (Priority, Focus, etc.) under this waiver application will be published. Additionally, the school's overall and subgroup performance targets will be highlighted to illustrate that the performance target was met or exceeded, was not met, or was within the range of the standard error of the measurement. These performance targets will take the place of NCLB's Annual Measurable Objectives.

For non-Priority and non-Focus Schools, each school will develop a local school board approved school improvement plan that addresses the school and/or subgroup missed performance targets, as described above, in addition to the other metrics presented in the performance report. Guidelines for such plans will be provided by the NJDOE at the beginning of the 2012-2013 school year. This work will be a joint product of the Divisions of Academics and Performance and the Department's RACs.

Unlike many other school and district report card systems, New Jersey's will go beyond assessing school and district performance. The NJDOE will help educators and parents understand and enhance the achievement of every student by developing additional student-level metrics and analytical tools within New Jersey's statewide, student-level longitudinal data system. These tools will include an Early Warning Report, College and Career Report, and a Successful Post-Secondary Student Profile.

Early Warning Report

A series of performance metrics will be designed to function as an Early Warning System (EWS) that will identify students who are at-risk of failing to achieve college- and/or career-readiness. These metrics will begin in first grade and continue through twelfth grade. An example of one measure to be reported annually throughout a student's school career will be his or her attendance rate; special attention will be directed toward those who are chronically absent, a powerful indicator of future challenges.

In third grade, when state testing begins, student-level proficiency will be added as a metric, and carried forward into fourth, fifth, sixth, seventh, eighth and eleventh grades. In fourth grade, student-level growth scores ("Student Growth Percentiles" or "SGPs," which measure how much growth a student made relative to his or her academic peers) will be added as a metric, and carried forward into fifth, sixth, seventh and eighth grade.

In high school, a record of course credits earned will be added. Additionally, suspensions and expulsions will also be noted. Each metric in the EWS will be "drill down-ready," meaning that with one click, an educator will be able to obtain a roster of students in a particular category, such as students in fourth grade demonstrating partial proficiency, low growth, and chronic absenteeism. This powerful report will be ready for Statewide deployment at the beginning of the 2012-2013 school year.

College and Career Report

The College and Career Report will also be available at a student level to provide educators with performance metrics that demonstrate college-readiness such as PSAT, SAT, ACT and AP test scores. Additionally, a student's transcript data –including courses taken and grades earned – will be provided by the NJDOE and can be cross-referenced with end-of-course assessments such as Algebra I, in addition to third-party assessments, such as AP tests. Furthermore, a student's participation and success in Industry or Credential Exams, as part of his/her Career and Technical Education (CTE) program, will also be included. This report will also be ready for statewide deployment by the beginning of the 2012-2013 school year and will be enhanced as additional metrics become available, such as new end-of-course exams.

Successful Post-Secondary Student Profile

The NJDOE will construct a Successful Post-Secondary Student Profile for each high school using real outcome data, similar to the work done by Montgomery County, Maryland in the formation of their "Seven Keys." Beginning in the fall of 2011, data from the National Student Clearinghouse will be joined with the longitudinal data in New Jersey's statewide, student-level data system to build a profile of a typical 2011 high school graduate enrolled in post-secondary education within four months of graduating high school.

The profile will include state assessment scores, SAT scores, AP scores, and twelfth grade attendance data. As the 2011 high school graduate cohort ages through college, the profile will be updated to reflect those students who remain continuously enrolled in college. In 2015, it will then be possible to construct a profile at a high school level of those students who successfully completed post-secondary education. These profiles can be used by high schools to set their own specific goals for proficiency levels in all tested grade levels, SAT scores, and attendance trends.

IV. Differentiated Recognitions, Interventions and Supports

Categories

New Jersey's new unified accountability system will identify schools using the criteria in the four categories defined below. These categories are triggers for the NJDOE's differentiated recognition, intervention, and support system:

Priority Schools

Priority schools are the lowest performing schools across the state with regard to absolute

achievement or graduation outcomes and those that are persistently low achieving. The NJDOE will structure intense, mandatory interventions and supports (in alignment with the application's "turnaround principles") that match each school's particular needs.

Focus Schools

Focus schools are those in which particular subgroups have extremely low achievement levels or lag far behind their peers. The NJDOE will identify targeted interventions and supports that are specific to the school's needs (e.g. instructional leadership) and the subgroups in question, such as ELLs or students with disabilities.

Reward Schools

The NJDOE will recognize, celebrate, and reward schools with high overall and subgroup achievement levels and those that are demonstrating great progress.

All Other Schools

The NJDOE will provide detailed, specific data to illustrate the strengths and areas in need of improvement for all schools so that progress in each area and in every subgroup can be tracked and used to inform school improvement activities and to illustrate the performance targets met or not met.

The methodologies for identifying each category of school, for determining appropriate interventions and supports, and the criteria for monitoring progress can be found below in the subsections of Principle 2.

Interventions

The structural and philosophical changes made to the NJDOE over the last year (described above) will enable the state to assist schools and districts to an extent far exceeding the Department's previous capacity. The NJDOE will make available to all schools a wide array of support, but the most troubled schools—those falling into Priority and Focus status—will receive extensive attention.

The Department's new RACs will play a critical role. Teams from these offices will visit and assess every Priority and Focus school and, in conjunction with the NJDOE's central office, district and school leaders, educators, and families, develop a comprehensive individualized school improvement plan for each school keyed to the interventions described below.

In years past, the State has exercised less authority than it might have when it comes to requiring districts to take bold action in their persistently underperforming schools. Today's NJDOE, however, will use the full leverage granted it under Title I and various provisions of state law to ensure districts faithfully implement improvement plans for Priority and Focus Schools.

For all districts receiving Title I money with one or more Priority or Focus Schools, the individualized school improvement plan for each Priority and Focus School must be incorporated into the district's Local Educational Agency Plan ("LEAP") submitted to the NJDOE every August pursuant to the ESEA. *See* 20 U.S.C. § 6312. Before Title I monies can flow to a district, the NJDOE must approve the district's LEAP.

If a district's LEAP fails to incorporate, either in whole or in part, the individualized school improvement plan for each of the district's Priority and Focus Schools, the NJDOE will reject the LEAP and withhold all Title I funds from the district until it comes into compliance with this waiver application. A district will be considered in compliance only when:

1) The District's LEAP fully incorporates each individualized school improvement plan for each of the district's Priority and Focus Schools; and
2) District leadership has executed a Statement of Assurances committing the district to implementing its LEAP. A sample Statement of Assurances is attached to this waiver application as Appendix 6.

For districts not receiving Title I money with one or more Priority or Focus Schools, the NJDOE will work collaboratively with district leaders to implement each individualized school improvement plan. However, if any such district refuses to implement a plan, either in whole or in part, the NJDOE will make use of its far-reaching statutory and regulatory powers under state law to compel action. The NJDOE is empowered, among other things, to:

1) Ensure that "all educational expenditures in the district will be spent effectively and efficiently in order to enable students to achieve the core curriculum content standards" (N.J.S.A. § 18A:7F-60);
2) "Take any affirmative action as is necessary to ensure the effective and efficient expenditure of funds by school districts" (N.J.S.A. § 18A:7F-60);
3) "Direct [] the restructuring of curriculum or programs" (N.J.S.A. § 18A:7F-6(b));
4) "Direct [] staff retraining or reassignment" (N.J.S.A. § 18A:7F-6(b)); and
5) "Redirect [] expenditures" (N.J.S.A. § 18A:7F-6(b)); and "Review[] the terms of future collective bargaining agreements" (N.J.S.A. § 18A:7F-6(b)). The NJDOE also has unique authority to authorize charter schools, set requirements for educator certification and licensure, and, where all else fails, close persistently failing schools.

Interventions and Supports for Priority Schools

The NJDOE is now poised to support and intervene in meaningful, lasting ways in both Priority and Focus Schools. The Department will identify at least 5 percent of Title I schools as Priority Schools. With guidance and support from the Department's senior leadership, the NJDOE's RACs will take the lead on developing and implementing customized interventions based on the needs of each school. Each intervention category aligns with the "turnaround principles" outlined in this waiver's guidance documents.

Quality School Reviews (QSRs) will be used to differentiate interventions in order to meet the needs of each school. Intensive interventions have been developed to address:

School Climate and Culture: Establishing school environments that support the social, emotional and health needs of all students

School Leadership: Ensuring that the principal has the ability to lead the turnaround effort

Standards Aligned Curriculum, Assessment and Intervention System: Ensuring teachers have the foundational documents needed to teach to the rigorous college and career ready standards that have been adopted

Instruction: Ensuring teachers utilize research-based effective instruction to meet the needs of all students

Use of Time: Redesigning time to better meet student needs and increase teacher collaboration focused on improving teaching and learning

Use of Data: Ensuring school-wide use of data focused on improving teaching and learning

Staffing Practices: Developing the skills to better recruit, retain and develop effective teachers

Family and Community Engagement: Increasing academically focused family and community engagement

Priority school interventions will be closely monitored and continued for a two year period of time which may be extended to three years if the NJDOE determines, in its sole discretion, that a Priority school is making substantial progress.

Interventions and Supports for Focus Schools.

The NJDOE will identify at least 10 percent of Title I schools as Focus Schools. These schools will be selected from Title I schools that are not categorized as Priority Schools and will be identified based upon within-school achievement gaps and low performance among particular subgroups. Any non-Title I school that would otherwise meet the same criteria will also be designated as a Focus School. The Department's RACs will work with LEAs to develop and implement customized improvement plans for Focus Schools, targeted specifically at the identified achievement gaps, and aligned to the federal turnaround principles listed above. These improvement plans will likely include specific interventions and supports for students with disabilities and ELLs as their subgroup performance has been traditionally lower than others.

Recognitions and Rewards for Reward Schools.

The NJDOE will identify Reward Schools based on high proficiency levels or high levels of growth, including progress toward closing achievement gaps. This will allow for a range of schools from across the state to attain Reward status, regardless of their absolute starting point. The Department will provide financial incentives to Reward schools to be used with input from the school community, and will work with partner organizations to help these schools share best practices with educators across the state.

Non-categorized Schools.

The NJDOE will develop school performance reports and school and subgroup performance targets for all schools in the state, regardless of whether they fall into one of the three categories above. For all non-categorized schools, LEAs will be required to hold public meetings to review the data, including progress toward meeting the targets, and identify strategies to improve performance gaps. Non-categorized schools will have flexibility in the interventions they use to address achievement gaps and other

performance challenges and will be invited to attend regional trainings and professional development sessions offered for Focus and Priority schools by the RACs. Through these optional capacity-building opportunities and through supports provided to all schools through the Department's website, non-categorized schools will be able to benefit from the supports offered to Focus and Priority schools.

The accountability system described above is a critical component to NJDOE's efforts to identify, differentiate, and support all schools, enabling all students, regardless of background, the opportunity to graduate college- and career-ready.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☒ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, Priority, and Focus Schools.	☐ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, Priority, and Focus Schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

Insert text for Option B here.

2.B Set Ambitious but Achievable Annual Measurable Objectives

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☒ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average Statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average Statewide proficiency based on assessments administered in the 20102011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

Performance Targets (formerly Annual Measurable Objectives)
The NJDOE is more fully integrating its expectations for specific school-level and sub-group improvement in student achievement outcomes into a coherent performance and accountability framework. Instead of terming these metrics "Annual Measurable Objectives (AMOs)", the NJDOE has re-titled them Performance Targets.

The NJDOE will calculate state-, district-, school- and subgroup-level performance targets, determine whether schools achieved each target, and report the results each year in the New Jersey School Performance Report. Schools, districts, and staff from the NJDOE's RACs will use this data to inform their school-specific strategies for improvement.

The waiver application requires states to select a method for establishing these performance targets. Option A is defined as setting the targets in annual equal increments so that within six years the percentage of non-proficient students in the 'all students' group and in each subgroup is reduced by half.

For example, if the 'all students' group is currently demonstrating a proficiency rate of 40 percent, the methodology would take the 60 percent point gap between 100 percent proficiency and the current rate (100 – 40 = 60) and then divide the gap in half to determine the target for the sixth year – a gain of 30 percentage points (60 / 2 = 30).

Then, the 30-percentage point gain is divided into six equal increments (30/6 = 5) so that annual targets can be set. Thus, the school in this example begins this process with a rate of 40 percent and is then expected to move to proficiency rates of 45 percent, 50 percent, 55 percent, 60 percent, 65 percent, and finally 70 percent in each of the following years of the six-year period.

As illustrated in the table below, the process for defining the six-year goal for the percentage of proficient students in each content area across the State was conducted in the following manner:

1. Determine the percentage of students who were not proficient in the 2010–2011 school year (Column 1 below);
2. Divide that percentage by 2 (Column 2);
3. Subtract the number in Column 2 from 100 percent. This resulting percentage is the SEA's goal for the 2016–2017 school year (Column 3; and
4. Establish annual incremental performance targets by dividing the number in Column 2 by six (Column 4).

PROCESS: DETERMINING SIX-YEAR GOALS

Process Steps			1	2	3	4
Level	Subject	2010-11 Percent Proficient	2010-11 Percent Partially Proficient	Partially Proficient divided by 2	2017 Percent Proficient Goal	Annual Equal increments
State	L	71.7	28.3	14.2	85.9	2.4
State	M	78.1	21.9	11.0	89.1	1.8

The NJDOE repeated the process described above for each subgroup of students in the State to identify the SEA's goal for the 2016–2017 school year for each subgroup, ensuring that the State's six-year goals reduce by half the percentage of students in each subgroup who are not proficient. Also, subgroups of students who are further behind are expected to make greater rates of annual progress (as demonstrated by the differences in the expected annual increments). The NJDOE established performance targets for the content areas of language arts literacy and math; as such, the assessment results for grades 3-8 and 11 are aggregated.

The table below, "State Level Performance Targets" details these performance targets for each content area and subgroup.

STATE LEVEL PERFORMANCE TARGETS

KEY	T	Total	B	African American	O	Two or more races
`	SE	Students with Disabilities	H	Hispanic		
	EC	Economically Disadvantaged	A	Asian/Pacific Islander	LEP	Limited English Prof.
	W	White	N	Native American		

Level	Subject	subpop	2011 Partially Proficient	2011 Partially Proficient divided by 2	Current 2010-2011 Percent Proficient	Equal Annual Increments	2012 P% TARGET	2013 P% TARGET	2014 P% TARGET	2015 P% TARGET	2016 P% TARGET	2017 P% TARGET
State	L	T	28.3	14.2	71.7	2.4	74.1	76.4	78.8	81.1	83.5	85.9
State	L	SE	59.3	29.7	40.7	4.9	45.6	50.6	55.5	60.5	65.4	70.4
State	L	EC	48.3	24.2	51.7	4.0	55.7	59.8	63.8	67.8	71.8	75.9
State	L	LEP	71.3	35.7	28.7	5.9	34.6	40.6	46.5	52.5	58.4	64.4
State	L	A	13.9	7.0	86.1	1.2	87.3	88.4	89.6	90.7	91.9	93.1
State	L	B	48.6	24.3	51.4	4.1	55.5	59.5	63.6	67.6	71.7	75.7
State	L	H	44.1	22.1	55.9	3.7	59.6	63.3	66.9	70.6	74.3	78.0
State	L	N	32.4	16.2	67.6	2.7	70.3	73.0	75.7	78.4	81.1	83.8
State	L	W	19.6	9.8	80.4	1.6	82.0	83.7	85.3	86.9	88.6	90.2
State	L	O	31.1	15.6	68.9	2.6	71.5	74.1	76.7	79.3	81.9	84.5

State	M	T	21.9	11.0	78.1	1.8	79.9	81.8	83.6	85.4	87.2	89.1
State	M	SE	50.9	25.5	49.1	4.2	53.3	57.6	61.8	66.1	70.3	74.6
State	M	EC	37.6	18.8	62.4	3.1	65.5	68.7	71.8	74.9	78.1	81.2
State	M	LEP	54.2	27.1	45.8	4.5	50.3	54.8	59.4	63.9	68.4	72.9
State	M	A	6.9	3.5	93.1	0.6	93.7	94.3	94.8	95.4	96.0	96.6
State	M	B	43.6	21.8	56.4	3.6	60.0	63.7	67.3	70.9	74.6	78.2
State	M	H	33.2	16.6	66.8	2.8	69.6	72.3	75.1	77.9	80.6	83.4
State	M	N	26.4	13.2	73.6	2.2	75.8	78.0	80.2	82.4	84.6	86.8
State	M	W	14.4	7.2	85.6	1.2	86.8	88.0	89.2	90.4	91.6	92.8
State	M	O	25.8	12.9	74.2	2.2	76.4	78.5	80.7	82.8	85.0	87.1

New Jersey will apply the performance targets to the State, each LEA, school and subgroup annually, utilizing a minimum "N" size of 30 for all students and for each subgroup.

District-Level
The NJDOE will repeat the process described above for each subgroup of students in the district to identify the district's performance targets for the 2016–2017 school year for each subgroup, ensuring that the six-year goals reduce by half the percentage of students in each subgroup who are not proficient and that subgroups of students who are further behind are expected to make greater rates of annual progress.

School-Level
The NJDOE will repeat the process described above for each subgroup of students in the school to identify the school's performance targets for the 2016–2017 school year for each subgroup, ensuring that the six-year goals reduce by half the percentage of students in each subgroup who are not proficient and that subgroups of students who are further behind are expected to make greater rates of annual progress.

Interpreting Performance Targets
As mentioned above, the NJDOE will publish each school's and district's performance targets and whether they were met on an annual basis as part of the School Performance Report. As part of a system of accountability and performance metrics, these performance targets will help schools, districts, and community stakeholders more fully understand the performance of their school by identifying both strengths and areas for improvement.

However, New Jersey's diversity of schools in terms of size, the number of subgroups present in any given school building, and ultimately the relatively small number of students in any particular subgroup present a unique challenge in interpreting performance targets. The NJDOE also determined that for the

highest performing schools and subgroups, this will likely present unreasonable increments as the performance targets approach 100 percent proficiency with the result of identifying schools at the absolute top of the performance level as failing to meet their performance targets. The NJDOE therefore established that schools and subgroups could meet expectations by either reaching their individually determined performance targets or a proficiency rate of 90 percent. This rate will be increased to 95 percent in 2015. In this way, the absolute proficiency will always be higher than any target established (no target is higher than 90 percent next year, and no target is higher than 95percent in 2015). The Performance Targets calculated will require schools that are currently further behind in student achievement to make greater rates of progress in order to reach their goals.

2.C Reward Schools

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as Reward Schools.

The NJDOE has long recognized Title I Schools of Excellence and National Blue Ribbon Schools across the state. This waiver application offers an opportunity to further recognize excellent schools by formally designating a set of schools as Reward Schools. As found in the key attached to Table 2 below, the waiver application specifies that NJDOE designate two sub-categories within the Reward category. They are schools that are "Reward-High Performing", denoted as required in Table 2 as Category A, and "Reward-High Progress", denoted as required in Table 2 as Category B.

These two sub-categories of Reward schools allow the NJDOE to recognize two separate but very important types of success. The first type of school demonstrates remarkable success for all of its students and for each subgroup. These schools are deemed to be Reward-High Performing (Table 2: Category A) because they have met measures of Adequate Yearly Progress (AYP) for all of their students and subgroups during the 2010-2011 school year, have a school-wide proficiency rate above 90 percent (that is, 90 percent of the school's students met or exceeded state standards as measured by our statewide assessments), and, at the high school level, have a graduation rate above 90 percent.

To ensure that a high school-wide proficiency rate for such schools does not mask low subgroup performance, we also require Reward-High Performing schools to have high performance in each subgroup. Specifically, we require that each subgroup in a Reward-High Performing school rank in the top 10 percent of performance, relative to that subgroup's performance across the state. To ensure that any subgroup deficiencies are pervasive enough to warrant a school being ineligible for reward status, The NJDOE has included only subgroups with more than 30 students, that represent at least 5 percent of its school's student enrollment, and whose student growth percentile (described more fully below) is below 65 (failing to reach the NJDOE's marker for "high growth").

The second type of Reward School is called Reward-High Progress (Table 2: Category B). These schools – while perhaps not meeting AYP benchmarks – are set apart from other schools because they are demonstrating a remarkable rate of progress. The NJDOE will measure the "trajectory" of a school by utilizing the SGP methodology. SGP calculates a school's growth by using the median growth score of a school's student population. This number, which ranges from 1 to 99, is centered on a statewide median of 50. The NJDOE has determined that schools with an SGP score of 65 or higher is demonstrating high growth and will designate these schools as Reward-High Progress.

In creating the list of Reward Schools (Categories A and B), the NJDOE employed the following specific methodology:

Step 1: The NJDOE categorized all Title I schools that met the following criteria as Reward-High Performing (Table 2: Category A):

1) A school that met AYP benchmarks for all students and subgroups during the 2010-2011

year;
2) Achieved an "all students" proficiency rate above 90 percent;
3) At the high school level, achieved a graduation rate of above 90 percent, and
4) Achieved a proficiency rate in the top 10 percent of performance with respect to each eligible subgroup. This is a relative measure that determines whether each subgroup in a Reward-High Performing school ranks in the top 10 percent of performance, relative to that subgroup's performance across the state. As mentioned above, the NJDOE has included only subgroups with more than 30 students, that represent at least 5 percent of its school's student enrollment, and whose student growth percentile is below 65 (failing to reach the NJDOE's marker for "high growth").

Step 2: The NJDOE categorized all remaining Title I schools that obtained a median student growth percentile (SGP) of 65 or higher as Reward-High Progress (Table 2: Category B).

Step 3: To continue the commitment toward the establishment of a single, unified system of accountability, recognitions, and interventions, the NJDOE also classified all non-Title I schools that otherwise met the conditions in steps #1 or #2 as Reward Schools of the respective type.

The Reward School list in Table 2 is based on the last three years (2008-2009, 2009-2010, and 2010-2011) of state assessments data, median student growth percentiles derived from the 2008-2009 and 2009-2010 assessments, and 2010-2011 graduation rates based on New Jersey's four-year adjusted cohort model required by 34 C.F.R. §200.19.

New Jersey aims to avoid one-year aberrations from unduly influencing the results when we formally categorize schools as Reward in the future. Therefore the NJDOE plans to incorporate additional years of state assessments, SGP and graduation rate data as it becomes available (i.e., calculating SGP from the 2009-2010 and 2010-2011 assessments). This will allow the Department to more accurately determine which schools are consistently most effective in advancing student learning. SGP scores based on the 2010 and 2011 test administrations are expected to be available no later than December 2011, at which point they will be incorporated into an updated list of Reward Schools.

New Jersey will ensure *all* schools are recognized for their high achievement and progress. Per ESEA Flexibility Guidelines, New Jersey is committed to recognizing Reward Schools that are not only high-performing in the aggregate but those that are also closing the achievement gap between subgroups. To that end, schools that are already classified as a Focus School are not included in the universe of schools eligible to be identified as Reward Schools.

2.C.ii Provide the SEA's list of Reward Schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

The NJDOE will implement several rewards and recognitions for its highest-performing and high-progress schools. The decision on how to use any monetary rewards the school receives from the state will be made by the district and school based on feedback from stakeholders, including teachers and district leaders.

The State will define a new category of schools as "New Jersey Schools of Excellence." This designation will be noted on the school performance report, as well as on the NJDOE website. Additional recognitions may include:

1. Plaque identifying the school as a "New Jersey School of Excellence" presented to each school and district at a State Board of Education meeting;
2. Statewide press releases;
3. Selected schools/districts/students asked to present at a workshop at the NJDOE's Annual Effective Practices Conference;
4. Governor and/or Commissioner visit;
5. Students and staff attend a special rally/celebration held in Trenton for all "New Jersey Schools of Excellence" at the War Memorial; and/or
6. Scholarships for teachers to obtain National Board Certification.

In addition to these non-monetary recognitions, Title I-funded schools that have sustained achievement and have demonstrated high progress will receive monetary awards, using Title I funds. School principals, in consultation with school representatives, including at least two teachers and two parents, will have discretion over how to use these funds within their schools.

The top five Title I Schools that are designated "Reward-High Performing" will receive a monetary reward of $100,000 each. The recognized schools that receives a monetary reward for sustained achievement must:

1. Have a poverty rate of at least 35 percent over the three-year period;
2. Have received a Title I allocation and operate a Title I program;
3. Meet the criteria of a Reward School as articulated in 2.C.i, Category A; and
4. Enroll students without a selective admissions process.

The top five Title I Schools that are designated "Reward-High Progress" will also receive a monetary reward of $100,000 each. The recognized schools that receives a monetary reward for high progress must have:

1. A poverty rate of at least 35 percent over the three-year period;
2. Received a Title I allocation and operate a Title I program;
3. Meet the criteria of a Reward School as articulated in 2.C.i, Category B; and
4. Enroll students without a selective admissions process.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as Priority Schools.

In addition to identifying Reward schools as specified above in Section 2.C.i., this waiver application calls upon the NJDOE to categorize at least 5 percent of the Title I schools across the state as Priority Schools. Priority Schools are schools that demonstrate very low levels of success, either in their school-wide student proficiency rates or in their overall graduation rates. This category of schools will require sustained, systemic interventions, and supports as described below.

The key to Table 2 below describes three sub-categories of Priority Schools. The first sub-category includes Title I schools across the state with the lowest absolute levels of proficiency as measured on the state assessments (Table 2: Category C). In other words, when ranked by the percent of the students who passed the test school-wide, these schools' percentage of students passing the test was among the lowest across the state. In creating this category, however, the NJDOE also took into account whether, despite the low levels of school-wide student achievement, the school was demonstrating progress. Thus, schools that would have otherwise been categorized as Priority Schools were removed if they were demonstrating high growth, as measured by the SGP methodology, described above in 2.C.i. Because the calculation of SGP is not possible at the high school level, a high school was removed from this category if its average yearly increase in their proficiency rate was greater than 5 percentage points as measured on New Jersey's High School Proficiency Assessment (HSPA).

A second sub-category of Priority Schools is high schools among the lowest performing schools in the state (as described in the preceding paragraph) that *also* have a low, school-wide graduation rate (Table 2: Category D). The waiver application specifies that all such high schools with a graduation rate below 60 percent be included in this category. The graduation rate is calculated based on New Jersey's four-year adjusted cohort model required by 34 C.F.R. §200.19. After examining New Jersey's graduation rate across all Title I High Schools in the state, the Department determined that a graduation rate of 60 percent was too low a threshold. Adhering to the 60 percent graduation rate threshold would have under-identified struggling high schools with persistently high dropout rates and low retention rates. Thus, based on an analysis of the data, the NJDOE has included any high school with a graduation rate below 75 percent in this sub-category.

A third sub-category of Priority Schools includes those previously identified as a Tier 1 or Tier 2 school under the federal School Improvement Grant program (Table 2: Category E).

Taken together, the total number of schools in Priority status must be equal to at least 5 percent of Title I schools statewide. As there are 1,444 such Title I schools statewide, the NJDOE has identified **72** Title I schools (and 2 non-Title I schools) as Priority utilizing the following methodology:

Step 1: The NJDOE began by classifying the 19 schools previously identified as Tier 1 and Tier 2 SIG schools as Priority Schools (Table 2: Category E).

Step 2: The NJDOE removed from further consideration any school with a median SGP of 65 or higher, or any high school with average *yearly* increases in proficiency rates greater than 5 percentage points on New Jersey's High School Proficiency Assessment (HSPA).

Step 3: Next, the NJDOE rank-ordered all remaining Title I schools by their school-wide proficiency rates on the appropriate state assessments and selected the lowest-performing 53 schools as Priority schools. This group of schools formed the basis for the second and third sub-categories of Priority Schools (Table 2: Categories C and D).

Step 4: From this set of 53 schools, the NJDOE classified high schools with graduation rates below 75 percent as Category D schools, and all remaining schools as Category C schools.

Step 5: In order to create a unified system of accountability, recognitions, and interventions, the NJDOE added any non-Title I school ranking below the highest ranked Title I school that meets the above criteria to their appropriate Priority School category.

The Priority School list in Table 2 is based on the past three years (2008-2009, 2009-2010, 2010-2011) of State assessments data, graduation rates, median student growth percentiles (SGPs) based on the 2008-2009 and 2009-2010 assessments, and, for high schools, increases in proficiency rates over time. As New Jersey has heretofore relied on the National Center of Education Statistics' "leaver" graduation rate, our metric relies only on the 2011 gradation cohort. Similarly, SGPs based on the most recent test administrations (2009-2010 and 2010-2011) are currently being computed and not yet available.

New Jersey aims to avoid one-year aberrations from unduly influencing our results, and therefore plan to incorporate additional years of this data as it becomes available. An additional year of cohort graduation rate data, for instance, will allow the state to track improvements in college-readiness over time, while additional years of SGP data will allow us to determine which schools are consistently most effective in advancing student learning. SGPs based on the 2009-2010 and 2010-2011 test administrations are expected to be available no later than December 2011, at which point they will be incorporated into an updated list of Priority schools.

2.D.ii Provide the SEA's list of Priority Schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with Priority Schools will implement.

Introduction

A staff of qualified school turn-around experts located in seven RACs throughout the state will identify and assist in implementing a system of intense interventions targeted to address key areas of need, as identified by Quality School Reviews (QSRs). The needs and interventions will be included in individualized school improvement plans developed for each Priority school and approved by the school's LEA. The RAC staff will be fully supported by NJDOE senior staff. Resources developed by the NJDOE and used in Priority school interventions will include: model CCSS aligned curriculum and assessments, professional development supporting improved instruction, data systems for improving teaching and learning, guidelines for identifying quality enhanced and extended learning opportunities, as well as innovative strategies to support low-performing students. The NJDOE senior staff will prioritize the resource needs of the RACs and continually improve the NJDOE resources based on RAC feedback from school-level implementation. This process will efficiently leverage the NJDOE staff to develop, adopt or identify resources that can be used across all RACs, while requiring RACs, located closer to schools, to help implement interventions and provide feedback on implementation issues to the NJDOE. This dynamic system is supported by a strong communication system and accountability for all parties to improve student achievement in these lowest performing schools. RACs will also have the freedom and flexibility to look outside of the NJDOE to adopt resources, materials or programs they believe will best meet the needs of the students in the specific Priority schools under their direction. These RACs will be staffed with qualified school-turnaround experts by spring 2012. Training on QSRs and any other required training in their specific area of expertise will be completed during the spring and summer of 2012. The seven fully staffed RACs will be prepared to start work in the identified Priority schools at the start of the 2012/2013 school year.

The NJDOE process of QSRs and the system of differentiated interventions based on QSR data are well aligned to the "turnaround" principles supported by research and the USDOE as key for improving or turning around low performing schools. The full set of interventions available to be implemented in Priority schools address all of the following areas: school climate and culture, strong principal leadership, effective instruction, curriculum, assessments and interventions, use of time, use of data, effective staffing practices, and family and community engagement. In order to successfully differentiate these interventions RACs will conduct QSRs focused on the eight areas. Through QSRs, RACs will determine, in collaboration with the school, which interventions are necessary to turn the school around and include those interventions in an individualized school improvement plan for each Priority School.

If the Priority school is in a Title I district, the district will have to incorporate the school's individualized improvement plan in its annual Local Educational Agency Plan and sign assurances that the district will faithfully implement its LEAP. If the district refuses to do so, the NJDOE will withhold the district's Title I monies until the district comes into compliance. If the Priority school is in a non-Title I district, then the NJDOE will compel implementation of the school's individualized improvement plan by using the statutory and regulatory powers discussed, in part, in section 2.A.i.

Turnaround Interventions[2]

See Appendix 7 for a chart of Turnaround Interventions

School Climate & Culture

The RACs may identify any of the following interventions in any Priority School that fails to have a safe and healthy learning environment capable of meeting the social, emotional and health needs of students:

- Embed a climate and culture specialist in the school funded with school-level Title I funds;
- Require professional development for all staff and leadership to implement a comprehensive plan for improving the school climate and culture; and
- Require professional development to build the capacity of the leadership team to monitor and take actions for continually improving the climate and culture of the schools.

The effectiveness of these interventions will be monitored in part using attendance and discipline data as well as climate survey responses from students, parents and staff. Effectiveness will ultimately be measured by student achievement on school and state level assessments.

School Leadership

In coordination with the LEA, the RACs may identify any of the following interventions in any Priority School where they have determined the school principal is unable to lead the turnaround effort:

- Remove and reassign the school principal and approve any replacement;
- Require professional development for the school leader Focused on instructional leadership including the collection of data and feedback mechanisms for continually improving instruction; and
- Provide flexibility in the areas of scheduling, budget, staffing and curriculum.

The effectiveness of these interventions will be measured by improved instructional leadership behaviors of the principal and improved student achievement as measured by school- and state-level assessments.

Curriculum, Assessment & Intervention System

The RACs may identify the following intervention in any Priority school where it is determined the school lacks a quality curriculum, assessment or intervention system to prepare all students, including students with disabilities, English Learners and low performing students, to be college- and career-ready:

- Implement the NJDOE model curriculum, unit assessments and quality interventions for all students two or more grade levels behind in reading or mathematics.

The effectiveness of this intervention will be measured by improved instruction, effective standards-based

[2] All interventions will be implemented consistent with State statutes and regulations, as well as any district collective bargaining agreement.

curriculum, assessment and intervention implementation as well as improved student achievement measured by school and state level assessments.

Effective Instruction

The RACs may identify any of the following interventions in any Priority School where instruction is deemed to be ineffective:

- Require mutual consent for up to 100 percent of staff;
- Require professional development for all teachers focused on effective instruction;
- Prohibit Tier 1 (ineffective) or Tier 2 (partially effective) teachers from being assigned to the school following the full implementation of the new teacher evaluation system (2013-2014); and
- Require professional development for the principal focused on the skills necessary for improving instruction.

The effectiveness of these interventions will be measured by improved instruction, the number of teachers identified as Tier 3 (effective) or Tier 4 (highly effective) on the new teacher evaluation system (2013-2014), and improved student achievement as measured by school- and state-level assessments.

Effective Use of Time

The RACs may identify any of the following interventions in any Priority School that fails to utilize instructional time and time for teacher collaboration to prepare all students including English Learners, students with disabilities and low-achieving students to be college- and career-ready:

- Require a schedule change to increase instructional time;
- Require a schedule change to support academically focused teacher collaboration;
- Require professional development for all teachers on effective use of instructional time including effective transitions; and
- Require professional development for school leaders on effective scheduling to support learning.

While the form of this intervention may include extended learning time during the school day, it may also include extended learning opportunities in the form of either before school or afterschool programs consistent with CCSS. The NJDOE may partner with organizations, either for-profit or not-for-profit, and school-based entities to identify best practices and strategies for effective extended learning opportunities. Where the RACs, in consultation with the leaders, teachers, and parents of the Priority School, determine that implementation of extended learning opportunities are necessary to help in improving student achievement, they will work with the school to identify appropriate programs. To the extent the RACs identify before school or afterschool tutoring or related supports as appropriate, the school may provide these services themselves or contract with an appropriate provider organization (either for-profit or not-for-profit) or school-based entity. The effectiveness of this intervention will be measured by improved student achievement as measured by school and state level assessments.

Effective Use of Data

The RACs may identify any of the following interventions in any Priority School that fails to demonstrate

effective use of data to inform instructional improvements:

- Embed a full time data specialist in the school funded by school-level Title I funds;
- Require professional development for all teachers in data analysis to improve instruction; and
- Require professional development to build the capacity of the principal to collect and analyze data for improving instruction and the skills necessary to develop a schedule and system for increasing teacher ownership of data analysis for improving instruction (PLC).

The effectiveness of this intervention will be measured by an increase in the numbers of teachers using data to inform instruction as well as improved student achievement as measured by school-and state-level assessments.

Effective Staffing Practices

The RACs may identify any of the following interventions in any Priority school that fails to recruit, retain and develop effective teachers:

- Require professional development for the principal and leadership team on effective staffing practices; and
- Require outside master educators to conduct observations as part of a comprehensive evaluation process.

The effectiveness of these interventions are measured by an increased number of teachers identified as Tier 3 or 4 on the new teacher evaluation system (2013-2014) as well as improved student achievement as measured by school- and state-level assessments.

Effective Family and Community Engagement

The RACs may identify any of the following interventions in any Priority School that does not have effective practices for engaging family and community in academically focused activities.

- Revise the job description of the family and community engagement staff in order to focus engagement on academics;
- Require professional development for family and community engagement staff designed to increase their skill level in developing academically focused engagement opportunities for families and the community; and
- Require professional development for all staff on the development and implementation of effective academically focused family and community engagement.

The effectiveness of these interventions will be measured by an increase in the number of academically focused family and community engagement opportunities as well as improvement on key indicators on the school climate survey. In addition, effectiveness will be measured by student achievement on school- and state-level assessments.

Timeline for Interventions

In all assigned Priority schools where Collaborative Assessment and Planning for Achievement (CAPA) reviews have not been completed within the previous 24 months, the RAC staff will complete the QSR process during the Fall of 2012. Individualized school improvement plans will be designed for each Priority school and reviewed with the school and district during winter 2013. Intervention implementation will begin in all these Priority schools during the Fall of 2013. All Priority Schools will receive the targeted interventions as determined by the RACs and agreed to by the LEA for a two-year period, providing schools the time needed to implement required changes and demonstrate improvement in student achievement. That period maybe extended to three years if the NJDOE determines, in its sole discretion, that a Priority school is making substantial progress. Priority Schools that fail to implement the required interventions or fail to demonstrate required improvement in student academic achievement may become subject to state-ordered closure or other action .

Focus Schools

The RACs will perform QSRs on all Focus schools during the winter/spring of 2013 to determine the appropriate intervention(s) and level of intervention(s) required for each school. The specific school improvement plans, while similar to those in Priority schools, will allow more school- and district-level flexibility. Individualized school improvement plans will be designed for each Focus school and reviewed with the school and district during the summer of 2013. Intervention implementation will begin in all Focus schools during the start of the 2013-2014 school year.

For all schools, the impact of the interventions will be regularly monitored by the RAC staff in order to ensure that all schools are implementing interventions effectively and making progress towards increasing student achievement. The RACs will be in constant communication with the NJDOE leadership in the central office in order to ensure that the central office is designing and providing the resources and guidance most effective to drive school improvement.

Additional Legislative Strategies

Though we believe strongly that the interventions described above will lead to substantial improvements in our Priority and Focus schools, the NJDOE believes that a number of changes to State law will both strengthen our proposed interventions and will significantly facilitate our work with struggling schools. Accordingly, the Christie administration and the NJDOE are strongly supporting four pieces of legislation presently before the Legislature that will enable the NJDOE to provide greater support to districts, schools, and, most importantly, students.

The first is comprehensive educator effectiveness legislation. The bill would create a statewide educator evaluation system (consistent with the provisions outlined in this waiver invitation), tie tenure to effectiveness, end forced placements and Last-In-First-Out (LIFO), and improve compensation systems. These changes to current law will drastically improve the State's human capital strategies, helping districts and schools recruit and retain highly effective educators. (the NJDOE already has the authority under current law and regulation to develop the statewide educator evaluation system described in Principle 3.)

Three of the bills would increase the educational options available to students in low-performing schools and districts. A bill to improve the State's charter school law would expand the number of charter authorizers, permit charter school conversions, and increase charter autonomy and accountability. The Opportunity Scholarship Act would provide tax credits to corporations that contribute to scholarship programs for low-income students. And the Urban Hope Act would encourage the development of new, high-performing schools in the State's five lowest performing districts. In combination, these bills would do a great deal to provide disadvantaged families with an immediate exit strategy while the State and districts work to improve performance in Priority schools.

In advance of the passage of the above-enumerated bills, and alongside the interventions described in this waiver application, the State will use its current set of authorities to vigorously recruit high-performing turnaround organizations to partner with struggling schools and charter operators to start new schools in districts with Priority Schools. During the state's annual charter application review process, the NJDOE will give preference to proposals that seek to locate in these districts and serve students in the grade spans found in the district's Priority Schools.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more Priority Schools implement meaningful interventions aligned with the turnaround principles in each Priority School no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

New Jersey's newly created RACs will be fully staffed by fall 2012 in order to deliver the interventions within Priority schools as schools open in September 2012. Therefore, the work to deliver support and ensure that schools implement interventions within Priority and Focus schools will begin before the start of the 2012 – 2013 academic year.

Before establishment of the RACs, the NJDOE conducted comprehensive school reviews through a process known as Collaborative Assessment and Planning for Achievement (CAPA). Many Priority and Focus Schools were recently reviewed under this CAPA process. Accordingly, Priority and Focus schools can be divided into two categories: those that underwent a CAPA review within the past 24 months (considered "Quality-Reviewed Schools") and those that have not (considered "non-Quality-Reviewed Schools".). For Quality-Reviewed Schools, the RACs may choose to conduct a QSR. If they choose to rely on the previous CAPA review then, in the spring and summer of 2012, the RACs will analyze the results of the previous CAPA review and identify appropriate interventions to be implemented. Identified interventions will be implemented by the districts beginning in September 2012.

For non-Quality-Reviewed Schools, subsets of the regional staff will conduct QSRs beginning in the Summer and Fall of 2012. For all non-Quality-Reviewed schools in Priority status, initial school reviews will take a total of three to six weeks to complete. Each individual school review will require approximately one week. At the end of each of these QSRs the development of a list of targeted interventions will be completed. This information sharing and planning with the schools and districts will take place during the Fall of 2012. Therefore, actual execution of targeted interventions for Priority, non-Quality-Reviewed schools could begin in the Fall of 2012.

We are expecting there will be a larger number of Focus Schools that have not had any recent CAPA Review and will require a new QSR to be completed. The Focus School reviews will take between ten to eighteen weeks to complete, followed by the joint planning process between RAC staff and the Focus school and its district staff. Therefore, targeted interventions for Focus, non-Quality-Reviewed schools could begin in the Fall of 2012 but no later than the Fall of 2013.

As a result, by the end of the 2012 – 2013 year, interventions in Quality-Reviewed Schools will have been implemented for a full school year, while all non-Quality-Reviewed Schools will have undergone a QSR and have an individualized school improvement plan ready to be implemented for the 2013-2014 school year. All interventions within each school turnaround principle area will continue for one full year, or until sustained improvement has been observed by the regional achievement teams.

For schools that have been determined to need interventions targeted at more than four of the school

turnaround principles, the RAC teams and the school staff will prioritize interventions for year one and year two. For all schools, the impact of the interventions will also be regularly monitored by the RACs in order to ensure that all schools are making progress towards increasing student achievement. The RAC staff will be in constant communication with the NJDOE leadership in the central office in order to ensure that the central office is designing and providing the resources and guidance most effective in driving school improvement.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits Priority status and a justification for the criteria selected.

While a school's progress and improvement will be monitored continuously, a school will typically remain in Priority status as long as the school meets the aforementioned criteria established in this waiver. However, based on the recommendation of the RAC, a school may exit Priority status based on its demonstrated progress in implementing the interventions aligned to the turnaround principles as outlined above in Section 2.D.iii, sustained improvement in achievement as demonstrated by the school's meeting its performance targets, or, demonstration of high growth (as measured by SGP as defined in 2.C.i or some other measure).

2.E Focus Schools

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "Focus Schools."

In addition to identifying schools as Reward, as outlined above in 2.C.i., and Priority, as outlined above in 2.D.i., the waiver application requires the NJDOE to identify at least 10 percent of its Title I schools, 144 schools, as Focus schools. As the name implies, the category of Focus schools includes schools with 'focused' deficiencies. With Focus schools, the NJDOE sees the opportunity to develop interventions and supports that may be targeted to a subset of a school's population to address its low achievement or a large within-school achievement gap.

As specified in the key to Table 2, the waiver application identifies three sub-categories within Focus Schools. The first requires the NJDOE to identify schools that have the largest within-school gaps between the highest-achieving subgroups and the lowest-achieving subgroups. Because these differences are measured in proficiency rate gaps, the within-school gap is a relative measure. In order to determine which schools have the largest within-school gaps, these gaps are determined for all schools and then ranked against each other across the state. The schools with the largest such gaps are identified for inclusion (Table 2: Category F).

A second sub-category requires the identification of schools that simply have subgroups whose performance, as compared to the rest of the state, is particularly low (Table 2: Category G). This subcategory consists of schools whose lowest-performing subgroups are demonstrating low levels of proficiency on statewide assessments when ranked against the rest of the State.

When determining the membership of Categories F and G described above, the NJDOE will combine the performance of a school's two lowest-performing subgroups and then rank the schools based on the combined performance of those two subgroups. For example, if the proficiency rate of a school's two lowest subgroups is 15 percent and 30 percent, respectively, the NJDOE will average these rates together (weighted by their respective shares of tested enrollment) to form a weighted average of proficiency Category F schools will be those that have the lowest performance using this combined proficiency rate. Category G schools will be those that have the largest within-school gap between the proficiency of the highest-performing subgroup and this combined proficiency rate.

When including subgroups in this analysis, the NJDOE has included only subgroups with more than 30 students, that represent at least 5 percent of its school's tested student enrollment, and whose student growth percentile (described more fully in 2.C.i.) is below 65 (failing to reach the NJDOE's marker for "high growth"); this was done to ensure that the 'focused' deficiencies in a particular building are pervasive enough to warrant the investment of the NJDOE interventions and supports.

The third sub-category of schools within Focus requires the identification of a high school whose graduation rate is less than 60 percent (Table 2: Category H). As detailed above in the identification of

Priority Schools, in section 2.D.i., the NJDOE chose to raise this graduation threshold to 75 percent to prevent the under-identification of high schools with significant dropout or retention rates.

The universe of schools from which Focus Schools are selected is all Title I schools that are not already identified as Priority Schools. As mentioned above, the waiver requires the identification of 10 percent of Title I schools as Focus, 144 schools. The NJDOE's methodology, described below, identifies 19 schools in Category H, 35 Title I schools in Category F, and 90 Title I schools in Category G. Our inclusion of non-Title I schools (described below) added 27 schools to Category F, 1 to Category G and 7 schools to Category H. To create the particular subcategories, the NJDOE utilized the following methodology:

Step 1: The NJDOE began by identifying all Title I-eligible and Title I-participating high schools that are not previously identified as a Priority School with a graduation rate less than 75 percent (Table 2: Category H). This resulted in the identification of 19 high schools across the state.

Step 2: Next, the NJDOE computed the within-school gap, as measured by the difference in percentage points of proficiency, between the highest-performing subgroup and the average proficiency of the two lowest-performing subgroups in each Title I school. As mentioned above, to be included in the analysis, a subgroup must have at least 30 students, represent at least 5 percent of the total student population, and have an SGP score below 65 (if an elementary or middle school). The Department then ranked the schools according to their gaps and selected the 35 schools with the largest gaps across the state – representing about 30 percent of the remaining schools in the Focus category after the identification of the 19 high schools in Step 1 above. (Table 2: Category F).

Step 3: The NJDOE then ranked the remaining Title I schools that are not already classified as Focus Schools according to the combined and weighted proficiency rates of their two lowest-performing subgroups. Again, to be included each subgroup must have at least 30 students, represent at least 5 percent of the total student population, and have an SGP score below 65 (if an elementary or middle school). From this ranking, the Department selected the 90 schools with the lowest combined proficiency rates across the state (Table 2: Category G). This netted to a total of 144 schools within the Focus School category.

Step 4: In order to create a unified system of accountability, recognitions, and interventions, the Department added any non-Title I school ranking below the highest ranked Title I school that meets the above criteria to their appropriate Focus School category.

The Focus School list in Table 2 is based on the past three years (2008-2009, 2009-2010, and 2010-2011) of State assessments data, graduation rates, median student growth percentiles (SGPs), based on the 2008-2009 and 2009-2010 assessments, and, for high schools, increases in proficiency rates over time.

New Jersey aims to avoid one-year aberrations from unduly influencing our results, and the Department will incorporate additional years of this data as it becomes available. An additional year of

cohort graduation rate data, for instance, will allow the NJDOE to track improvements in college readiness over time, while additional years of SGP data will allow the Department to determine which schools are consistently most effective in advancing student learning. SGPs based on the 2009-2010 and 2010-2011 test administrations are expected to be available no later than December 2011, at which point they will be incorporated into an updated list of Focus Schools.

2.E.ii Provide the SEA's list of Focus Schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more Focus Schools will identify the specific needs of the SEA's Focus Schools and their students and provide examples of and justifications for the interventions Focus Schools will be required to implement to improve the performance of students who are the furthest behind.

A high-level timeline for these interventions is included in the Priority School section above. Focus Schools, like Priority Schools, will receive QSRs in all school turnaround areas to determine the areas of deficiency causing them to fall into Focus status.

Focus school interventions are targeted to the same turnaround principles described above. The interventions available to be applied are similar to those applied to Priority Schools with greater allowances, however, for school- and district-level input.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits Focus status and a justification for the criteria selected.

While a school's progress and improvement will be monitored continuously, a school will remain in Focus status as long as the school meets the aforementioned criteria established in this waiver. However, based on the recommendation of the Director of the RAC, a school may exit Focus status based on its demonstrated progress in implementing the interventions aligned to the turnaround principles as outlined above in Section 2.D.iii, sustained improvement in achievement as demonstrated by the school's meeting its subgroup performance targets, a significant narrowing of the achievement gap, or demonstration of high growth in its lowest subgroups as measured by the SGP methodology or some other methodology.

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

To ensure all schools are engaged in continuous improvement, the NJDOE will develop a school performance report for all schools, as described in 2.A.i. In a clear and accessible manner, the NJDOE will report on the performance of each school by focusing on the most critical measures of student achievement including subgroup measures and key college- and career-readiness metrics (e.g. AP, SAT, scores). (See Appendix 5 for a copy of the prototype Performance Report)

These performance reports will identify schools that are not making progress or meeting targets. They will also identify highly successful schools, thereby allowing the NJDOE to recognize and celebrate districts and schools with high achievement as well as districts and schools with high growth. This recognition will serve as an incentive for schools and districts to continue innovating and improving, and it will enable the NJDOE to learn from these schools and districts and share their best practices widely.

The performance report will also identify key areas of need for all New Jersey schools. That is, while some schools will not fit into the Priority or Focus categories, they may nevertheless have weaknesses in need of attention. In order to ensure districts are addressing these deficiencies districts are expected to develop targets for improving, which will be reviewed and approved by their Board of Education.

For schools that have not been designated as Focus or Priority Schools, the RACs will review their status through performance reports and other analyses. While staff in RACs will target support services to Priority and Focus Schools, many of the supports provided by these teams will be available to other Title I schools as well. Other Title I schools will be invited and encouraged to attend regional trainings and professional development sessions designed around the NJDOE interventions and school turnaround principles, and the State's model curriculum will be made available to all schools and districts. In these ways, other Title I schools will have access to many of the same supports being provided to Priority and Focus Schools. Further, many resources will be placed on the NJDOE website. These web resources include, but are not limited to, webinars, online professional development courses, toolkits and guidance. All schools will benefit from these resources.

RACs will also pay particular attention to schools that are close to reaching Priority status. Though we will not conduct comprehensive school reviews for these schools (as will be done for Priority and Focus Schools), regional teams will intermittently monitor progress and offer assistance in order to prevent the school from falling into the Priority category.

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in Priority and Focus Schools;
ii. holding LEAs accountable for improving school and student performance, particularly for turning around their Priority Schools; and
iii. ensuring sufficient support for implementation of interventions in Priority Schools, Focus Schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

The State has several strategies for ensuring the success of interventions in Priority and Focus Schools. The state's seven new RACs will be committed solely to improving student outcomes; they will focus primarily on Priority and Focus Schools. These offices will conduct reviews of underperforming schools, diagnose the causes of schools' challenges, and provide the support and interventions required for meaningful and lasting improvement. The teams will include specialists in reading, math, data use, and more; they will be in schools regularly. The teams will be able to ensure that reforms are underway and that results follow. This is a departure from prior NJDOE practice, in which school supports and interventions were often delivered in an unfocused, temporary, and undifferentiated manner.

The NJDOE has also built a Delivery Unit into its new organizational structure (See attachment 1). This division is charged with ensuring that results are achieved across all of the NJDOE's initiatives. Teaming with the RACs and the NJDOE's Division of Performance, the leaders of the Delivery Unit will establish explicit performance metrics for Priority and Focus Schools and closely monitor progress against goals.

The State has numerous levers for ensuring that LEAs improve the performance of their lowest-achieving schools. The first way to hold LEAs accountable is through a robust school performance report. Annually, each school will receive a thorough report detailing its performance along a number of measures (see 2.A. i.). These reports will be made public.

Each school will be evaluated based on its achievement on State assessments; the growth of its students as measured by the SGP; and in its College and Career Readiness as measured by a variety of school metrics. (see Appendix 5 for a copy of the Prototype Performance Report).

Each school will be compared to the State overall as well as to schools with similar student bodies.

The report will provide demographic information as well as financial data, again in comparison to the State average and peer schools.

The report will provide detailed information on the performance of the school relative to the school's specific school-wide and subgroup targets for accountability purposes. Proficiency and growth will be reported over time for language arts, math and science, and by each subgroup.

This performance report will be used to identify schools that are not making progress or meeting targets. Districts will be required to have public meetings to review the data and identify the areas in which improvement is needed. Districts will be required to address performance gaps among various groups. Districts will develop proposed targets for improvement that will be reviewed annually by the RACs. Targeted technical assistance will be offered through the RACs.

For schools that have not been designated as Focus or Priority, the RACs will review performance reports to identify areas for improvement and identify the combination of services and interventions that could improve student learning. Such interventions and services may include training to improve the quality of school leadership, high-quality curriculum aligned to the Common Core, and assistance in the analysis and use of data.

Beyond making school information public, and as described more fully in Section 2.A.i., the NJDOE has extensive authority under federal and state law to bring about major change in school and district behavior. The NJDOE can, among other things, reassign teaching staff, redirect spending to ensure funds are spent effectively and efficiently, alter curriculum and programs, charter new schools, and, where all else fails, close chronically failing schools

The State is relying on four strategies for growing the capacity of schools, LEAs, and the State to improve student learning and close the achievement gap. The first is increased information. Through detailed, user-friendly school performance reports, the State will provide actionable information on student performance to schools, districts, and the public.

Second, the NJDOE has restructured its central organization to enable the State to provide improved supports to schools and LEAs. The new Division of Educator Effectiveness, through initiatives on recruiting, preparation, certification, evaluation, and more, will help grow and improve the State's human capital, that is, collection of effective educators. The new Division of Academics will provide to schools and districts an abundance of support, including model curricula, formative assessments, leadership training, and more.

Third, the NJDOE is building seven RACs as described in 2.D.iii. Each will be responsible for improving student achievement, particularly in Priority Schools, in its region. State Title I funds will be repurposed to provide the aforementioned supports and interventions to Title I Priority and Focus Schools.

Fourth, the NJDOE has undertaken an exhaustive effort to remove unnecessary burdens placed on the State's educators. A Governor's task force on regulatory reform is culling thousands of pages of laws

and regulations to identify provisions that inhibit educators from focusing on student learning.

Combined, these efforts will enable the State, LEAs, and schools to faithfully implement meaningful interventions in struggling schools. They will also help strengthen the internal capacity of the State, LEAs, and schools to continue and develop school improvement efforts over time.

New Mexico

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Introduction to New Mexico's Model

The Elementary and Secondary Education Act (ESEA) has had several tangible effects on education and the monitoring of schools. There have been both intended and unintended consequences. While ESEA monitoring requirements under NCLB has set clear and concrete goals and firmly established that all students need to be considered, there is now opportunity to build upon these strengths and develop a school accountability system that further enhances policy makers ability to fairly and accurately monitor schools. The literature (Linn, 1998; Baker, Linn, Herman, and Koretz, 2002; Choi, Goldschmidt, and Yamashiro, 2005; Baker, Goldschmidt, Martinez, and Swigert, 2003) is clear that in order to effectively monitor schools for interventions and reward, several pieces must be in place in order to create a coherent, comprehensive, unbiased, and fair system. Differentiating among schools for the purposes of providing support where needed and recognition where warranted should, to the extent possible, avoid confounding factors beyond school control with factors for which schools ought to be held accountable (Goldschmidt, 2006).

We address the four elements (coherence, comprehensive, unbiased, and fair) that are the basis for the New Mexico school accountability system that enhances our ability to differentiate school performance in a more nuanced way than under the current ESEA system. A coherent system is one that seamlessly links together the elements of the system and incorporates stakeholders' beliefs regarding what schools ought to be held accountable for. Hence, a coherent system collects elements that individually and jointly lead to the correct inferences about schools

and the correct motivations for improvement. This is realized be considering validity evidence that supports inference based on school grades; a notion similar to content and construct validity evidence (Messick, 1995; Mehren, 1997). That is, each element of the system should logically relate to better school performance (content validity evidence) and overall, the accumulation of elements should adequately represent the domain of interest (i.e. school performance). Hence, we directly link the New Mexico A-F School Grading System to the AMOs (which we term School Growth Targets, or SGTs). We detail below (in 2.B.) how basing SGTs on school grades captures exactly the types school performance and growth that policy makers intended, but does so without creating a secondary set of (potentially) conflicted indicators of school performance. The A-F Grading System is also consistent in methodology to the portion of the highly effective teacher evaluation system that will be based on student assessment results. This is an extremely important concept as: one, it holds schools accountable in a manner similar to teachers (based to some degree on student achievement growth; two, it allows for similar types of inferences about schools and teachers; three, it provides for similar nomenclature, which help teachers, school administrators, parents, and other stakeholders place meaning on school and teacher performance; and four, it creates consistent and coherent incentives for improvement (i.e. teachers' improvement leads directly to school improvement, and conversely, where school grades play a role in teacher evaluation, school grades are based on factors to which all teachers contribute.

Components of New Mexico's Model

The notion of comprehensive system is linked with coherence in that a coherent set of elements that forms the basis for making inferences about school performance should be comprehensive and is consistent with the idea of basing school inferences on multiple measures (Baker, et. al. 2002). Tables one and two summarize[1] the elements in the New Mexico school grading system.

[1] Attachment X3 details how a school receives points in each category.

Table 1:

A-F School Grades, Elementary and Middle Schools				Points
Proficiency Math & Reading	Status	% Proficient	25	40
All Students	Status	Conditioned, 3 Yrs	15	
All Students	School Growth	Conditioned, 3 Yrs	10	30
Highest 3 Quartiles	Student Growth	Conditioned, 3 Yrs	20	
Lowest 1 Quartile	Student Growth	Conditioned, 3 Yrs	20	
Attendance	Status	Average , All Students	3	3
Opportunity to Learn	Status	Average Score	5	5
Total				100
Student/Parent Engagement	Bonus	District Option		(+5)

Table 2:

A-F School Grades: High Schools			Points	
Proficiency Math & Reading	Status	% Proficient	25	40
All Students	Status	Conditioned, 3 Yrs	15	
Highest 3 Quartiles	School Growth	Conditioned, 3 Yrs	10	20
Lowest 1 Quartile	School Growth	Conditioned, 3 Yrs	10	
Graduation	Status, 4 Year	% Graduating	8	17
	Status, 5 Year	% Graduating	4	
	School Growth	Conditioned, 3 Yrs	5	
College & Career Readiness	Participation	% All HS Students	5	15
(AP, ACT, PSAT, Dual Credit, Career Preparation)	Success	% Meeting Benchmarks	10	
Attendance	Status	Average , All Students	3	3
Opportunity to Learn	Status	Average Score	5	5
Total				100
Student/Parent Engagement	Bonus	District Option		(+5)

We also consider bias and fairness. There is considerable agreement that monitoring schools based on unconditional mean school performance or the percentage of student's proficient does not hold schools accountable for processes under school control and tends to place large diverse schools at a disadvantage (Novak and Fuller, 2003). Static average student performance measures tend to confound input characteristics (i.e. student enrollment characteristics) of schools with actual school performance (Goldschmidt, Roschewski, Choi, Autry, Hebbler, Blank, & Williams, 2005; Choi, Goldschmidt, and Yamashiro, 2005; Meyer, 1997; Goldstein & Spiegelhalter, 1996) and are unduly influenced by factors outside of school control more than

actual processes facilitated by schools (Hanushek, Raymond, 2002; Baker, Goldschmidt, Martinez, and Swigert, 2003; Meyer, 1997). Hence, the New Mexico school grading model, and the corresponding SGTs were carefully developed to reduce bias in attributions of school performance, and we monitored carefully fairness – in that all schools must have equal opportunity to do well on the elements of the school grading system. We monitor bias considering the extent to which school grades are influenced by the background characteristics of enrolled students.

For, example, the correlation between the percent of students meeting the previous NCLB AYP requirements and the percentage of students who are classified as free and reduced lunch eligible (FRL), is -.57 (truncated to some extent by the generally high proportion of FRL students in New Mexico). Our goal in developing the A-F School Grading System was to reduce the undue influences of student enrollment characteristics on school grades. We accomplished this by using both growth models and conditional performance estimates, which to some extent level circumstances faced by schools throughout the state, a process generally accepted and recommended in the literature Choi, et. al., 2005; Aitkin & Longford, 1986; Goldstein, & Spiegelhalter, 1996; Willms, & Raudenbush, 1989; Hanushek, 1979; Hanushek, Rivkin, & Taylor, 1996; Meyer, 1997; Heck, 2000).

We are also concerned with fairness; that is, not disadvantaging schools and limiting opportunities to demonstrate high performance or changes in performance. Hence, we monitored closely whether larger schools are disadvantaged or importantly, whether schools with high status levels (i.e. a high percentage of students proficient) would limit the amount of growth a school could exhibit. We present evidence related to both bias and fairness in appendix XX

A system that merely counts the percentage proficient students is limited because it reduces the amount of information available and ignores performance changes within categories that can be quite large (Thum, 2003; Goldschmidt and Choi, 2007). Moreover, basing inferences about schools on static measures ignores that learning is a cumulative process and that schools often face challenges related to the input characteristics of its students (Hanushek, 1979; Choi, et. al., 2005; Goldschmidt, 2006). For example, some schools consistently receive an extremely high proportion (>75%) of students who are English language Learners (ELL). While there may be debate as to the length of time it takes an ELL to acquire academic language skills – and the expectation should be that each student does so and graduates college and career ready - the

system should provide incentives for a school to educate those students by recognizing the achievement gains along the performance continuum.

We next provide detail related to the New Mexico School Grading System summarized in tables one and two.

The underlying framework for the New Mexico A-F School Grading System is that schools ought to be monitored based three general factors: one, current performance, or status; two, achievement growth; and three, other factors considered important outcomes and/or that contribute meaningfully to desired outcomes.

Status consists of two elements: percent proficient and a conditioned estimate of status based on Wilms and Raudenbush (1989) and Choi, Goldschmidt, and Martniez (2004)[2]. This conditioning uses the difference between observed and expected outcomes and would be considered a value added model (VAM). We use the estimated current year status as the conditional status estimate for a school. This effectively accounts for variation in student enrollment characteristics, for which schools have no control. This is evidenced by the correlations presented in table three, which indicates that variation in schools' student background has effectively been accounted for.

Table 3:

Correlations - Does VAM[1] work?

School Percent	VAM status	School Growth	Bottom Quartile Growth
African Amer.	-0.050	-0.017	0.034
Hispanic	-0.063	-0.004	0.044
Asian	0.055	0.145	0.141
Native Amer.	-0.001	-0.051	-0.063
Female	0.011	0.030	0.038
FRL	-0.079	-0.097	-0.056
SWD	-0.058	-0.069	-0.036
ELL	-0.044	-0.074	-0.033

Notes: 1) based on HS results (elementary/middle results are similar, but exclude bottom quartile growth (this is captured differently in elementary and middle school – see text).

Hence, this portion of a schools status grade is unaffected by its enrollment characteristics.

[2] The Model is presented in Attachment X

A school's growth is score also consists of two elements. We include both a school growth component and an individual student growth component[3]. It is in the growth component that New Mexico explicitly considers subgroups in the calculation of school grades. Careful examination of New Mexico data reveals that simply using the traditional race/ethnic, language, disability, and/or economic status does not fully identify schools with improvement needs. As table 4 indicates, by identifying the bottom quartile of students in each school, we explicitly consider how large the performance gap is for the poorest performing students and how this gap is changing over time, irrespective of student classification. This directly identifies the greatest need based on actual performance, rather than classifications that furthers a deficit model by labeling students as poor performers simply because their background characteristics. Moreover, by definition, every school has a bottom quartile and by explicitly placing extra weight on these students' growth, we incentive continuous improvement.

Table 4:

Performance Gaps of various student groups

	Percent of students	Performance Gaps[1]	
		Math	Reading
African American[2]	2.3	-6.3	-5.4
Hispanic	59.7	-5.6	-5.5
Asian	1.4	3.1	1.0
America Indian	9.9	-7.3	-7.6
Economically Disadv. (FRL)	69.6	-6.2	-6.2
ELL	20.2	-9.5	-10.6
SWD	13.1	-14.1	-16.1
Bottom Quartile	25.0	-15.1	-14.1

Notes: 1) State assessment scale is 0-80 (sd ~ 10.5).

2) Race/ethnicity comparisons are vs. White. Reaming gaps are vs. students not in the classification.

We emphasize that school grade results will be disaggregated by the traditional NCLB

[3] Like most states, New Mexico currently assess students once in HS, so individual student growth is not part of the grade calculation. However, New Mexico has adopted common core standards and is governing state in the PARCC consortium, which intends to develop assessment for grades 3-11. Hence, the A-F school grading model framework is prepared to include individual student growth at the student level once assessments become available.

subgroups and, importantly, that this information will be paramount in identifying interventions for Priority and Focus schools.

The growth of the bottom quartile at each school is included in both the elementary/middle school and the high school. In high school the growth estimate is based on the VAM model depicted in Attachment 15. In elementary and middle school, the growth for the bottom quartile is identified in the individual student growth model described next.

The second element of growth is based on an individual student growth model (Raudenbush and Bryk, 2002, Willet and Singer, 2003, Goldschmidt, et. al., 2005). The threat of potential confounding factors (PCFs) in non-randomized cross-sectional designs (Campbell & Stanley, 1963), and the limitations of pre-post designs (Bryk & Wesiburg, 1977; Raudenbush & Bryk, 1987; Raudenbush, 2001) in making inferences about school, program, or teacher effects (i.e. change in student outcomes due to a hypothesized cause) are also increasingly understood. These and other related methodological challenges lead many to consider the advantages of examining growth trajectories to make inferences about change (Rogosa, Brandt, & Zimowski, 1982; Willet, Singer, & Martin, 1998; Raudenbush & Bryk, 2002). The New Mexico model is detailed in Attachment 16.

Research indicates that growth models are well suited to monitor school performance over time and provide a more robust picture of schools' ability to facilitate student achievement than simple static comparisons. (Choi et. al., 2005). Growth models are a subset of the more general longitudinal models that examine how outcomes change as a function of time (Singer and Willet, 2003); these model are more flexible than traditional repeated measures designs because data need not be balanced nor complete (Singer and Willett, 2003; Raudenbush and Bryk, 2002). This latter point is important as the growth mode is robust to student mobility and can include students in a school's estimate of growth whether or not the student has a complete set of data[4]. New Mexico uses three years to estimate growth for a student, which logically fals within the tested spans of elementary and middle school[5]. As multiple authors have reported, static results tend to reflect student input characteristics (Goldschmidt, Roschewski, Choi, Autry, Hebbler, Blank, & Williams, 2005; Choi, et. al., 2005; Meyer, 1997) and factors outside of school control

[4] A simple gain model, for example is limited because if a student is missing either assessment a gain cannot be calculated.

[5] And will in high school once the PARC assessments come on line in 2014-15.

more than actual processes facilitated by schools (Hanushek, Raymond, 2002; Baker, Goldschmidt, Martinez, and Swigert, 2003; Meyer, 1997).

As noted above, student performance is a process that accumulates over time (Hanushek, 1979) and results ignoring this are unlikely to accurately identify performance due to processes under school or teacher control. A growth model explicitly connects student performance from one test occasion to the next.

There may be some debate as to what constitutes the optimal psychometric characteristics for assessments to be used in systems desiring to use growth models (Briggs & Weeks, 2009; Yen, 1986;), A key element for considering the use and interpretation of results based on growth models is that the outcome must have constant meaning over time (Raudenbush, 2001). Hence, the scale is important in drawing conclusions from individual growth curves (Yen, 1986). Theoretically, the optimal metric to use when examining change is a vertically equated IRT-based scale score that is on an interval scale and is comparable across grades (Hambleton & Swaminathan, 1987). Scores represent content mastery on a continuum and may be used to measure absolute academic progress over time. Different scaling methods affect results (Briggs and Weeks, 2011) and there is some concern that vertical equating using IRT does not guarantee an equal interval scale (Ballau, 2009). Also, equating is generally designed to compare contiguous grade pairs (Yen, 1986) and scales may be less meaningful as the grade span increases. However, previous research also indicates that the metric may be less important for relative decisions and inferences about schools based on growth models (Goldschmidt, Choi, Martinez, and Novack, 2010). The New Mexico assessments are based on a vertically moderated scale which form strong basis for incorporating growth into the accountability system[6]. Growth must be considered with respect to some reference. Some have argued that a good reference may be typical growth (Betebenner, 2009). New Mexico basis its growth on the notion of a year's worth of growth as identified, a priori, by the vertical articulation of standards across grades. This notion reduces the issues noted above related to scaling across more than contiguous grade spans. Hence, a year's worth of growth can be considered as moving from proficient one year to the next. In the New Mexico model, an estimated growth coefficient of 0 (zero) relates to a year's worth of growth, and a positive coefficient indicates that students are growing faster, while a negative coefficient indicates a student is losing ground. This concept is

[6] We note that the school growth VAM model we use is not dependent on scale (Choi, et. al., 2004).

less important for monitoring schools (Goldschmidt, et. al., 2010), but is important when considering AMOs (SGT in New Mexico).

Previous research has also addressed statistical issues, and compared the effects of model specification (particularly with respect to student background characteristics) in some detail (Tekwe, Carter, Ma, Algina, Lucas, Roth, Ariet, Fisher, & Resnick, 2004; Ballou, Sanders, & Wright, 2004; McCaffrey, Sass, Lockwood, & Mihaly. 2009; McCaffrey, Lockwood, Koretz, Louis, & Hamilton, 2004; Wright, 2010; Goldschmidt, et. al,, 2010; Lockwood, & McCaffrey. 2007; Wright, 2008) and we used this previous research to provided significant guidance for the model selection and specifications we developed for the A-F grading system. Also, we emphasize that schools grades are explicitly based on status and growth and schools will receive these grades separately (along with other factor grades as well). Hence, a school could be an "A" school in growth and a "C" school in status, which would (depending on the other factor, which is only 10% in elementary and middle school) result in a school being given an overall grade of "B."

Finally, we turn to the other factor in the school grading model. This consists of a student opportunity to learn survey (similar to those used in the MET study and by Wu, Goldschmidt, Boscardin and Sankar, 2009). The intent of this survey is to provide information related to average school opportunities to learn the materials, as these have been consistently demonstrated to be related to student performance, and provide a tangible mechanism for assisting in the process of school improvement. We also include student attendance and in high school we include two critical elements: graduation and college and career readiness. We consider college and career readiness in a manner that, again, incentives school to appropriately motivate students, while attempting to minimize unintended consequences. Hence, schools receive points for participation in college and career readiness activities (detailed in appendix X3). But schools receive double the points for success (also defined in appendix X3). While there are substantial complexities involved in calculating school grades (including estimating individual student growth trajectories and school growth VAM models), the tradeoff is that these model provide a significantly more nuanced examination of school performance. Consistent with the literature on school accountability (Linn, 1998; Baker, et. al., 2002; Goldschmidt, et. al., 2005; Choi, et. al., 2005; Goldschmidt and Choi, 2007; Thum, 2003), The New Mexico A-F school grading system uses multiple measures, incorporates growth, incorporates the full range of student achievement,

and specifically monitors the progress of the lowest achieving students in each school.

Table 2 on pages 45 – 56 includes a *preliminary* list of Reward, Priority, and Focus Schools. As PED will be finalizing the A-F School Grading Act rule in December and releasing final baseline data to all schools, the state will share a final list of Reward, Priority, and Focus Schools with the US Department of Education at that time.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☒ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☐ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

n/a

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal	☐ Set AMOs that increase in	☒ Use another method that is

increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

New Mexico's School Growth Targets (SGT)

Given the A-F School Grading System (described in 2ai). We base each school's SGT (formerly AMO) on the school grade. Our target is the recommended 90th percentile of current performance. It is important that we set rigorous but obtainable goals (Linn, 1998) and the underlying question is whether the 90 percentile of current performance is an appropriate long term target. Given that New Mexico has an A-F System, a target that aims for every school to be an A creates a meaningless measure that loses its ability to differentiate among schools their performance. Hence, we want a system where the long term goal meets the original intents of ESEA.

Unpacking the 90 percentile target is paramount in demonstrating that the A-F school grading system can serve as both the mechanism for monitoring school performance, but also

generating SGTs for schools. This aspect is important because the A-F system is comprehensive, and using it as a basis for SGTs maintains coherence for stakeholders. We again turn to the notion of validity evidence that corroborates the notion that a school at the 90 percentile is school performance worth emulating. We consider elementary/middle and high school in turn.

A school at the 90th percentile on the school grading metric has an average of approximately 47 on the New Mexico state assessment. Given the state average school size (to determine the standard deviation and estimate how many students are scoring above proficient) this implies that approximately 75% of students in math[7] are proficient. Also, a school at the 90th percentile on the school grading metric demonstrates, on average, a growth rate that is slightly above a year's worth of growth. In fact, this growth implies that about 12.5% of students would be proficient within a three year time frame. Hence, this is equates to roughly 88% of elementary or middle school students either being on track or at proficient or above. These same calculations for reading indicates 100% of students, attending a school with a school grade at the 90th percentile are either proficient or on track to proficient.

Next we can examine how many points (out of a 100) a school will need to earn to be at the 90th percentile. Overall for all grade levels this equates to about 72 (out of 100 points). Hence, a school would be "average" on the overall school grade, and this relates to about average (75 or a C) on status and about 83 or (a B on growth). This is exactly where the system ought to place schools. If status is influenced by factors beyond school control (albeit less in the New Mexico A-F system), then tenable expectations are warranted in terms of status, but to compensate, we must have higher expectations for growth.

For high school a school at the 90th percentile based on the current distribution of school grades would exhibit the following average performance on the grading elements: A four year graduation rate of 92%; a five year graduation rate of 93%; an attendance rate of 97.5 percent. Proficient or on target to proficiency (only a single additional year) of 83%[8] in mathematics and 100% in reading. Importantly, students in the bottom quartile would demonstrate growth with an effect size that is about 2.0 – indicating top performing schools are improving the

[7] The means are slightly different in reading, but the estimated percent proficient would be about 89%.
[8] We will have to target the 95th percentile to reach this status level in mathematics.

outcomes of the poorest performing students quite well and are substantively (statistically p <.01) closing the achievement gap[9]. The SGT for high schools would also be calculated in a like manner as elementary and middle schools.

Given that our aim is to move all schools to the current 90th percentile based on the current distribution of grades), we need to establish meaningful, rigorous, but obtainable targets. The New Mexico goal is to have all schools improve so that their grade would be equivalent to the 90th percentile score in the base year. We believe that a growth effect size of about 0.15 is both substantively meaningful and obtainable for schools. We accomplish this, on average, given the current distribution of school performance and calculating SGTs in the following manner:

$$SGT_j = (Target_j - CSG_j)/10.$$

Where $Target_j$ is the current average score for a school at the 90th percentile on the school grading system. There are j=3 targets: 1) school grade points 2) growth- reading top three quartile of students; 3) growth-reading bottom quartile of students; 4) growth-math top three quartile of students; 5) growth- math bottom quartile of students. We present a tangible example below.

Example of A School's SGT

	POINTS_ELEM	Bottom qrtile Growth Math	Bottom qrtile Growth Read	Top 3 qrtiles Growth Math	Top 3 qrtiles Growth Read
School A	43.0	3.0	4.5	4.0	4.0
TARGET	77.0	5.0	9.0	8.0	9.0
SGT	3.4	0.2	0.5	0.4	0.5

Metric is school grade points.

2.C REWARD SCHOOLS

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

[9] In fact, elementary, middle and high schools in New Mexico are closing the achievement, on average, p < .01, but the rate of gap closing varies significantly as well, p < .01).

Identification of Reward Schools

New Mexico proposes that using the A-F grading system as the mechanism to identify schools and to maintain coherence. Moreover, as described above, the school grades translate directly into tangible differences among schools on multiple indicators. Hence, we use the 95% percentile of performance on the overall school grade, as Reward Schools would be scoring above the statewide target of the 90th percentile set through the SGTs. We again turn to the base year distribution and use this distribution as a basis for identifying the highest performing schools. The highest performing schools then are the schools that receive "A/A" (status/growth) ratings and would be considered the highest performing Reward schools. However, schools with "A/B" or "B/A" grades will also be considered Reward school based on either high progress or high performance. We will also recognize schools that have "A" growth (but not "B" status) outside of the Reward designation as these are schools that face challenges related to the preparedness of students as they enter the school, but the school facilitates strong achievement growth – and hence warrant recognition.

2.C.ii Provide the SEA's list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Recognition of Reward Schools

Reward Schools will be recognized and rewarded in several ways. First, PED will annually release the list of Reward Schools on our website, as well as announce who the reward schools are in a press release. Second, each Reward School will receive a letter of recognition highlighting their individual achievements.

Third, PED is looking to used Reward Schools as a model of reform. As such, Reward School leaders will be asked to mentor leaders in lower achieving schools. The state is actively seeking private funding to provide stipends to the school leaders in reward schools to allow them to effectively undertake mentoring activities.

Fourth, as funding is available, PED will look to provide high-performing and high-progress schools with monetary rewards. Initially, PED will consider using a portion of the state's 1003(a) set-aside to provide a subset of schools with the highest overall performance and progress with monetary rewards.

Lastly, PED will partner with districts to identify areas of flexibility that could be provided to Reward Schools. As Reward schools will have already made tremendous progress with all students they serve, providing additional autonomy to allow them to continue to use innovation to make gains will potentially allow them to achieve at even higher levels.

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

Identification of Priority Schools

Consistent with identifying high performing schools, we rely on the New Mexico A-F Grading System to identify Priority Schools. We use the 2010-2011 base year distribution of grades to select those schools that fall at or below the 5% percentile of performance in the state. This corresponds generally to schools that receive "F/F" (status/growth) grades, but we also include "F/D" and "D/F" schools if their overall point total warrant inclusion (fall in the bottom 5th percentile). A school once identified remains a Priority School no less than two years (even if in the subsequent year one or both of its grades change). In subsequent years, Priority schools will be identified using a two year entry rule (i.e. a school that is an "F/F", "F/D", or "D/F" and maintains those grades for a second consecutive year). We will use this process separately for elementary and middle school and high school. For high schools, we deviate slightly. We again use the current year "F/F" as a starting point, but then inversely rank schools based on the graduation rate. Hence, lowest graded schools that are particularly weak in graduation rates will be selected to Priority status.

2.D.ii Provide the SEA's list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

Interventions in Priority Tools

New Mexico has multiple tools in place that align to the Turnaround Principles and are currently being used in schools in need of improvement. Building on that foundation, New Mexico will partner with Priority Schools and their district leaders to support them as they implement intervention strategies aligned to their individual area of need. Further, with the

flexibility granted under this waiver, districts will be able to utilize their 20% set-aside to support Priority Schools as they undertake meaningful interventions.

PED annually reviews and approves the operating budget of each district and charter school. Additionally, the A-F School Grading Act specified that the state will ensure that the funds being spent in D and F schools are targeted towards proven programs and methods linked to improved student achievement. PED will partner with districts during the budget review process to support their budget development to ensure alignment of tools in Priority Schools to proven strategies.

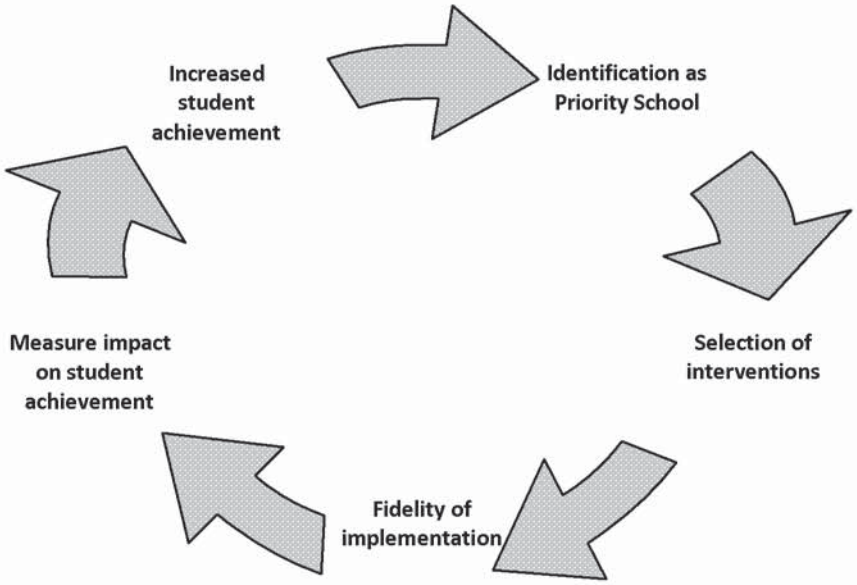
Once a school is identified as a Priority School, the expectation is that each school, with the support of their district and PEDs Priority Schools Bureau, will develop an intervention plan that is systemic, based on data, and is measurable. Included in each intervention plan will be the seven turnaround principles. The state feels strongly that each principle builds upon and supports those preceding and following it.

To ensure that interventions being used in Priority Schools are effective, PED will place a command focus on the fidelity of implementation. As schools implement tools such as formative assessments, instructional coaching, or response to intervention, the state expects to see data that reinforces the schools selection of such tools, as well as data to support their continued use. If over time student achievement is not increasing, the expectation is that schools, with the support of their district and the state, will shift funding to tools that do yield a return on investment.

In addition to a focus on fidelity of implementation, PED will also ensure that specific intervention selected by Priority Schools align to the needs of students. For example, if within a Priority School it is found that Hispanic students are struggling more than other subgroups of students, the school will be required to implement an intervention program that address the unique needs of that student group. If, over time, it is found that the achievement of a particular subgroup is not rising despite intervention, PED will support district leadership and Priority Schools as they prepare to use different interventions that will yield a return on investment.

The expectation of all Priority Schools is that they will follow a cycle of continuous improvement which leads to increased student achievement. First, a school is identified. Second, the Priority School, with the support of their LEA and PED selects interventions aligned to the Turnaround Principles and why they are identified as a Priority School. Third, the Priority School begins to implement interventions with fidelity. Fourth, schools measure the impact those interventions, tools, and supports are having on student achievement. And fifth, the

Priority School sees increased student achievement and movement towards meeting their SGT.



Attachments 18 and 19 describe in detail specific tools and professional development that align to each Turnaround Principle. Additionally, Attachments 20 – 24 provide additional details on specific supports and interventions available to Priority schools. After identification as a Priority School, PEDs Priority Schools Bureau will partner with schools identified as they select interventions that align to their needs and WebEPPS plan. Creating alignment within the two systems will increase the likelihood of success in raising student achievement.

The current School Improvement Grant (SIG) allows schools flexibility in replacing the principal if at the school for two or more years. The new Principal has the ability to create a schedule that can vastly impact student achievement (i.e., extend the school day or year, literacy and math blocks of 90-120 minutes per day, provide teachers with collaboration time either during or after the school day). The Principal also has flexibility with budgeting (i.e., planning, creating, and budgeting authority over expenditures). In the recruitment and hiring and retention of teaching staff there is much flexibility in that existing staff are screened to measure the effectiveness of staff who can work within the requirements of the SIG, there is an opportunity for financial incentives, and increased opportunities for career growth. SIG also support a schools effort to change formal policy and informal standard operating procedures that can directly empower their turnaround efforts. PED will look to expand these flexibilities to a

Principal that agrees to serve in a Priority School.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

Timeline of Interventions

Under the current AYP model, all schools currently designated as a school in need of improvement must complete a WebEPSS form. Currently 771 schools are completing and submitting for review to PED a WebEPSS.

Additionally, PED annually reviews and approves the operating budget of each district and charter school. The budget review process occurs in May and June of each calendar year. Because PED will release baseline school grades in December 2011, part of the review process in Spring 2012 will be to look in details at the programs and interventions being used in Priority Schools when districts submit their budgets.

This will allow Priority Schools to begin planning immediately for interventions they will undertake in the 2012-2013 school year. PED will work to ensure that the interventions each priority school undertakes will be detailed as part of their WebEPSS submission. The expectation will be that the interventions align not only to the turnaround principles, but also to why the school is designated as an F/F school.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

Exiting Priority School Status

In order to no longer be considered a Priority School (F/F), a school must receive a grade of D/F, F/D, or higher for two consecutive years. If a school moves from Priority to Focus status, they will be required to meet the intervention criteria detailed in section 2.E.iii. It is only when a school receives an overall grade of C or higher will they no longer be designated as Priority, Focus, or Strategic (as outlined in section 2.F).

The business rules to exit Priority School status are aligned to requirements set forth for PED in the A-F School Grading Act. The legislation specified that "ensure that a local school

board or governing body of a charter school is prioritizing resources of a public school rated D or F toward proven programs and methods that are linked to improved student achievement until the public school earns a grade of C or better for two consecutive years".

2.E FOCUS SCHOOLS

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

Identification of Focus Schools

The method for identifying Focus Schools continues logically from the methodology for identifying Reward and Priority schools. These schools form the next level of school grades and are made up of the D/F and F/D schools, but whose overall grade places them in the decile of performance above Priority schools. Again we apply the same two year into the category and two year out of the category rule as for Priority schools. In this case, we use the initial cut of 28 points[10] on the school grade. Any school below this cut for two consecutive years will become a Focus School. We again consider elementary and middle separately from high school and use graduation rates for high school designation. Table 2F summarizes how the school grading model differentiates the two major components of the elementary school model and naturally picks up weaknesses in status growth and growth in the lowest quartile of students (as well as gaps in performance between the lowest quartile subgroup and the rest of their classmates).

Table 2F
Summary of Elementary and Middle Assessment Performance by Category

Designation		Total Points	Status	Bottom Quartile Growth	top three Quartile Growth
Reward	Mean	80.51	31.55	15.08	17.82
	N	32	32	32	32
	Std. Deviation	3.53	2.91	2.50	1.75
Priority	Mean	14.53	7.61	5.86	1.90
	N	32	32	32	32
	Std. Deviation	3.25	2.96	2.72	1.60
Focus	Mean	24.00	10.91	6.64	5.30
	N	62	62	62	62
	Std. Deviation	2.16	2.90	2.98	3.08
Total	Mean	46.30	18.61	9.91	10.05
	N	602	602	602	602

[10] This cut score will increase in a consistent manner along with SGTs. Hence, this cut score will increase by 3 points each year until it reaches 60%.

2.E.ii Provide the SEA's list of focus schools in Table 2.

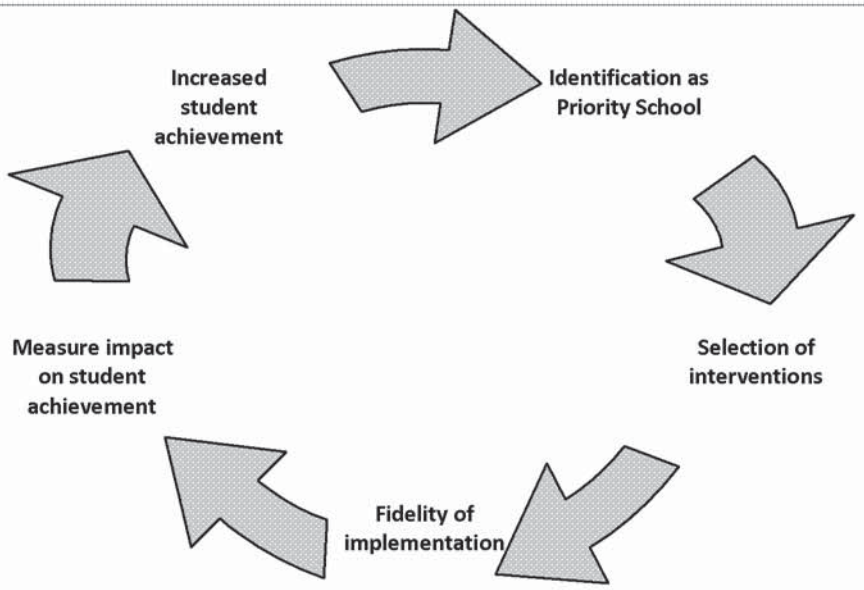
2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Interventions in Focus Schools

To adequately address the reason why a school has been identified as a Focus School, and to ensure that the academic needs of students in the school are met, Focus Schools must select four of the seven Turnaround Principles to implement. LEAs will be required to approve the principles selected and provide assurances to PED that they are aligned to the reasons why the school is identified as a focus school. While schools will have discretion, all focus schools must commit to use data to inform instruction.

Because all schools will receive baseline grades by the end of this calendar year (2011) and know if they are likely to be identified as a focus school once grades are given in summer 2012, the expectation is that all focus schools must immediately plan for and implement interventions aligned to the turnaround principles.

As Focus Schools prepare to align interventions, LEAs and PED will support Focus Schools as they prepares to align interventions as to why a school as identified. The budget review process and WebEPSS will be used to support the alignment of interventions to a schools designation as a focus school. Additionally, Focus Schools will be expected to follow the same cycle of improvement as Priority Schools.



In addition what is shown above, PED will work to ensure that specific interventions selected by Focus Schools are student focused and align to the needs of students. For example, if within a Focus School it is found that Native American students are struggling more than other subgroups of students, the school will be required to implement an intervention program that address the unique needs of that student group. If, over time, it is found that the achievement of a particular subgroup is not rising despite intervention, PED will support district leadership and Focus Schools as they implement different, more targeted tools and interventions.

Attachments 18 and 19 describe in detail specific tools and professional development that align to each Turnaround Principle. After identification as a Focus School, PEDs Priority Schools Bureau will partner with districts that have schools identified as they select interventions that align to their needs and WebEPPS plan. Creating alignment within the two systems will increase the likelihood of success in raising student achievement.

The current School Improvement Grant (SIG) allows schools flexibility in replacing the principal if at the school for two or more years. The new Principal has the ability to create a schedule that can vastly impact student achievement (i.e., extend the school day or year, literacy and math blocks of 90-120 minutes per day, provide teachers with collaboration time either during or after the school day). The Principal also has flexibility with budgeting (i.e.,

planning, creating, and budgeting authority over expenditures). In the recruitment and hiring and retention of teaching staff there is much flexibility in that existing staff are screened to measure the effectiveness of staff who can work within the requirements of the SIG, there is an opportunity for financial incentives, and increased opportunities for career growth. SIG also support a schools effort to change formal policy and informal standard operating procedures that can directly empower their turnaround efforts. PED will look to expand these flexibilities to a Principal that agrees to serve in a Focus School.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

Exiting Focus School Status

In order to no longer be considered a Focus School (F/D or D/F), a school must receive a grade of D/C, C/D, or higher for two consecutive years. If a school moves from Focus to Strategic status, they will be required to align interventions to the reason they are identified as a Strategic School. It is only when a school receives an overall grade of C or higher will they no longer be designated as a Focus or Strategic School (as outlined in section 2.F).

The business rules to exit Focus School status are aligned to requirements set forth for PED in the A-F School Grading Act. The legislation specified that "ensure that a local school board or governing body of a charter school is prioritizing resources of a public school rated D or F toward proven programs and methods that are linked to improved student achievement until the public school earns a grade of C or better for two consecutive years".

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

School Identifier	Priority	Focus	Reward
1			A B
2			A
3			A B
4			A B
5			A B
6			A B
7			B
8			B
9			A B
10			A B
11			A
12			A B
13			A
14			A B
15			B
16			A B
17			A
18			B
19			A
20			B

School Identifier	Priority	Focus	Reward
21			B
22			A B
23			A B
24			A B
25			B
26			A B
27			A
28			A B
29			A B
30			A B
31			A B
32			A B
33			A B
34			A
35			B
36			A
37			A B
38		G	
39		G	
40		G	
41		G	
42		G	
43		G	
44		G	
45		G	
46		G	

School Identifier	Priority	Focus	Reward
1			A B
2			A
3			A B
4			A B
5			A B
6			A B
7			B
8			B
9			A B
10			A B
11			A
12			A B
13			A
14			A B
15			B
16			A B
17			A
18			B
19			A
20			B
21			B
22			A B
23			A B
24			A B
25			B
26			A B
27			A

School Identifier	Priority	Focus	Reward
28			A B
29			A B
30			A B
31			A B
32			A B
33			A B
34			A
35			B
36			A
37			A B
38		G	
39		G	
40		G	
41		G	
42		G	
43		G	
44		G	
45		G	
46		G	
47		G	
48		I	
49		I	
50		I	
51		I	
52		F	
53		I	
54		F	

School Identifier	Priority	Focus	Reward
55		I	
56		I	
57		I	
58		I	
59		I	
60		I	
61		I	
62		I	
63		I	
64		I	
65		I	
66		I	
67		I	
68		I	
69		I	
70		I	
71		I	
72		I	
73		I	
74		I	
75		I	
76		I	
77		I	
78		F	
79		F	
80		I	
81		I	

School Identifier	Priority	Focus	Reward
82		I	
83		I	
84		I	
85		F	
86		I	
87		I	
88		I	
89		F	
90		I	
91		I	
92		I	
93		I	
94		I	
95		I	
96		I	
97		I	
98		I	
99		I	
100		F	
101		I	
102		I	
103		I	
104		I	
105		I	
106		I	
107		I	
108		I	

School Identifier	Priority	Focus	Reward
109		I	
110	C		
111	C		
112	C		
113	C		
114	C		
115	C		
116	C		
117	C		
118	C		
119	C		
120	C		
121	C		
122	C		
123	C		
124	C		
125	C		
126	C		
127	C		
128	C		
129	C		
130	C		
131	C		
132	C		
133	C		
134	C		
135	C		

School Identifier	Priority	Focus	Reward
136	C		
137	C		
138	C		
139	C		
140	C		
141	C		
142	C		
143	C		
144	C		
145	C		
146	C		
47		G	
48		I	
49		I	
50		I	
51		I	
52		F	
53		I	
54		F	
55		I	
56		I	
57		I	
58		I	
59		I	
60		I	
61		I	
62		I	

School Identifier	Priority	Focus	Reward
63		I	
64		I	
65		I	
66		I	
67		I	
68		I	
69		I	
70		I	
71		I	
72		I	
73		I	
74		I	
75		I	
76		I	
77		I	
78		F	
79		F	
80		I	
81		I	
82		I	
83		I	
84		I	
85		F	
86		I	
87		I	
88		I	
89		F	

School Identifier	Priority	Focus	Reward
90		I	
91		I	
92		I	
93		I	
94		I	
95		I	
96		I	
97		I	
98		I	
99		I	
100		F	
101		I	
102		I	
103		I	
104		I	
105		I	
106		I	
107		I	
108		I	
109		I	
110	C		
111	C		
112	C		
113	C		
114	C		
115	C		
116	C		

School Identifier	Priority	Focus	Reward
117	C		
118	C		
119	C		
120	C		
121	C		
122	C		
123	C		
124	C		
125	C		
126	C		
127	C		
128	C		
129	C		
130	C		
131	C		
132	C		
133	C		
134	C		
135	C		
136	C		
137	C		
138	C		
139	C		
140	C		
141	C		
142	C		
143	C		

School Identifier	Priority	Focus	Reward
144	C		
145	C		
146	C		

Key:

A: High Performing

B: High Growth

C: Low performing, Low Growth

D: Low Graduation Rate Growth

E: SIG School

F: Large Gaps

G: Low Performing Subgroups

H: Low Graduation Rate

I: Low Performing, Low Growth

Total # of Reward Schools: 37
Total # of Priority Schools: 37
Total # of Focus Schools: 72

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

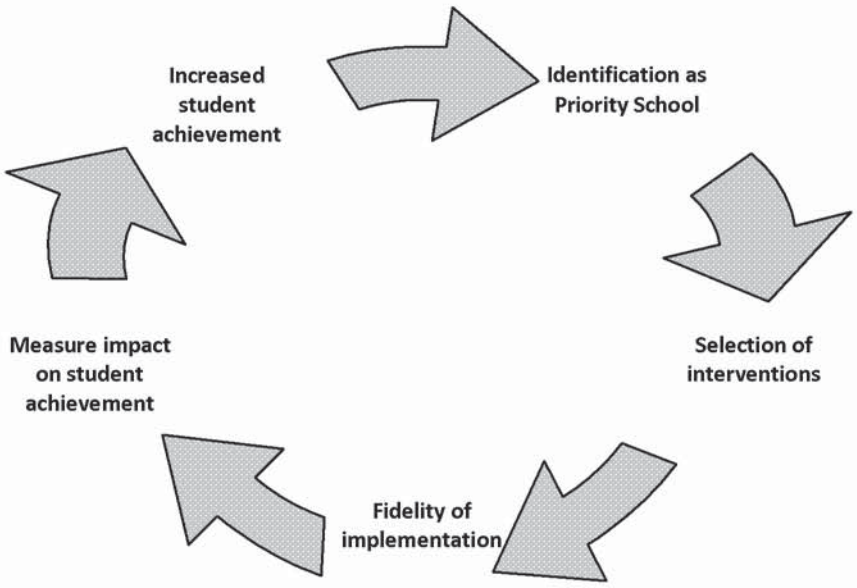
Identification and Support of Strategic Schools

In addition to Reward, Priority, and Focus Schools, the state will also identify Strategic Schools. The method for identifying Strategic Schools continues logically from the methodology for identifying Reward, Priority, and Focus Schools. These schools form the next level of school grades that include a D grade on at least one measure (proficiency or growth). For example, a school could receive a C for proficiency, but a D in growth, therefore leading to its identification as a Strategic School. Again we apply the same two year into the category and two year out of the category rule as for Priority and Focus Schools. We again consider elementary and middle separately from high school and use graduation rates for high school designation.

LEAs will be required to support Strategic Schools as they complete their WebEPSS submission and align interventions to support the needs of students in those schools. As with Priority and Focus Schools, the expectation is that any intervention or support selected is done so with the needs of students in mind. Placing a command focus on effective instruction will be the only way a school meets their SGT. Schools rated as Strategic are at risk of easily slipping in the either the Focus or Priority category. As such, fidelity of implementation will be closely monitored and prioritized. Because PED annually reviews and approves the operating budget of each district and charter school, PED will partner with districts during the budget review process to support their budget development to ensure alignment of tools in Strategic Schools to proven strategies.

Building the capacity of LEAs to support Strategic Schools is crucial to the overall success on New Mexico's differentiated accountability system. Because Strategic Schools sit on the balance of more intensive focus versus meeting their SGTs, supporting LEAs as they guide the intervention selection and implementation process will help to build capacity within LEAs.

As is the case with Priority and Focus Schools, Strategic Schools are expected to follow a cycle of continuous improvement to guide their use and implementation of interventions.



The current School Improvement Grant (SIG) allows schools flexibility in replacing the principal if at the school for two or more years. The new Principal has the ability to create a schedule that can vastly impact student achievement (i.e., extend the school day or year, literacy and math blocks of 90-120 minutes per day, provide teachers with collaboration time either during or after the school day). The Principal also has flexibility with budgeting (i.e., planning, creating, and budgeting authority over expenditures). In the recruitment and hiring and retention of teaching staff there is much flexibility in that existing staff are screened to measure the effectiveness of staff who can work within the requirements of the SIG, there is an opportunity for financial incentives, and increased opportunities for career growth. SIG also support a schools effort to change formal policy and informal standard operating procedures that can directly empower their turnaround efforts. PED will look to expand these flexibilities to a Principal that agrees to serve in a Strategic School.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

Developing and Sustaining Capacity

The New Mexico Public Education Department (PED) has built capacity in LEAs and schools with Technical Assistance onsite visits, Professional Development Trainings, and through the use of Accountability and Progress Monitoring Tools developed internally with an emphasis on scientifically research based best practices. Districts and schools participate in Exemplary Leadership Training, Data Dialogue Training, Fixsen Implementation School Indicators (school self assessment tool) Training and in turn have the tools and training necessary to train district and school leadership teams.

The tools along with professional development trainings, regular onsite technical assistance visits are necessary to improve student learning in all schools, specifically in the Priority and Focus Schools.

PEDs Priority Schools Bureau (with a timeline of every 4-6 weeks) will provide progress monitoring and support during the onsite visits to Priority and Focus Schools. The visits will consist of collaboration with District and School Leadership Teams, review of current assessment data and analysis of how the data is used to improve instruction, classroom observations and observation of Professional Learning Communities. School leadership teams will be trained in intervention strategies and best practices that align with the Seven Principles:

- Provide Strong Leadership;

- Ensure that teachers are effective and able to improve instruction;
- Redesign the school day, week, or year;
- Strengthen the schools instructional program;
- Use data to inform instruction;
- Establish a school environment that improves safety; and
- Engage families and communities.

LEAs will be held accountable for improving school and student performance through the use of the Curriculum Audit Handbook developed internally in collaboration with the Southwest Comprehensive Center. The purpose of the Curriculum Audit Handbook is to examine whether the school district is able to demonstrate its control of programs, resources and personnel. The Curriculum Audit Handbook can be utilized in a district with a disproportionate number of Priority/Focus Schools.

Priority and Focus Schools will undergo an Instructional Audit (IA) with PED and District Leadership trained on the tool in advance of the onsite visit to the school. The purpose of the Instructional Audit is to examine the systems put in place and supported by the school leadership that increase teacher effectiveness and enhance student learning through professional dialogue. It provides a tool by which an auditor or auditors (PED/District Leadership team) can compile data for feedback to a school about the instructional practices that were observed during the school visitation.

Priority Schools will utilize their school improvement plan (WebEPSS) to reflect the 7 Turnaround Principles. Strategies, action steps and interventions listed in the plan will support and indicate progress on the 7 Turnaround Principles.

Focus Schools will utilize their School Improvement Plan (WebEPSS) to reflect 4 of the 7 Turnaround Principles. Strategies, action steps and interventions listed in the plan will support and indicate progress on the 4 chosen Turnaround Principles. Strategic Schools will also utilize their WebEPSS plan to support and reflect the Turnaround Principles they are implementing.

Priority and Focus Schools will be assigned to a PED Support Specialist and go through a self evaluation using the Fixsen Implementation Drives and Rubric of Implementation Indicators. The review process begins by identifying where a school falls in the

implementation stages. Professional development, training and targeted assistance will begin once the results of the Instructional Audit and Fixsen Implementation Stages are identified. The PED Support Specialist will begin the onsite technical assistance process and provide district/school leadership teams with the intervention strategies, and researched based practices as indicated from the results of the IA and Implementation Indicators. Furthermore, PED will guide the facilitation and coordination of the Regional Education Centers (REC) throughout the State. The coordination intends to use RECs to help build internal District and School capacity in a differentiated approach.

PED personnel will continue to stay current with latest best practices through on-going professional development internally. Focus remains on the 7 Turnaround Principles.
PED intends to utilize the financial flexibility that is allowed through the Waiver including leveraging funds the District was previously required to reserve under ESEA section 1116(b)(10), SIG funds and other Federal funds as permitted to most effectively support the strategies, and interventions that have been discussed previously in this section.

Oklahoma

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Based primarily on the State's newly adopted A-F School Grading System, the Differentiated Recognition, Accountability, and Support System will provide a focused and coherent approach to continuous school improvement.

Oklahoma's *ESEA Flexibility Request* will transform accountability in the State by integrating state and federal accountability systems into one clearly defined, transparent system that will inform parents, districts, and other community stakeholders as to the progress of their schools, including their celebrations and their challenges. Oklahoma's new accountability system is a systemic approach to increasing student achievement by differentiating proactive interventions and raising the bar for all students to be college, career, and citizen ready; it will no longer be a system myopically focused on performance in math and reading, graduation rates, and implementation of reactive interventions. To help Oklahoma reach this goal, highlights of the new accountability system include:

- An A-F School Grading System applied to all schools and districts across the State;
- Student growth measures;
- Opportunities to achieve higher accountability status by demonstrating success in College, Career, and Citizen readiness indicators, such as AP and IB participation and performance, performance on the SAT and ACT, and completion of Algebra I at the 8th Grade level;
- A career readiness component that gives schools credit for student performance on national industry certification tests;
- Performance in core content areas (math, reading, science, social studies, and writing); and
- The effectiveness of teachers and principals.

Oklahoma's vision for comprehensive educational reform includes an accountability system that is not isolated, but instead works in conjunction with new College and Career readiness standards and assessments, as well as a new Teacher and Leader Effectiveness system to ensure success for every student.

A-F School Grading System

In 2011, the Oklahoma legislature adopted an A-F School Grading System to hold all schools and districts accountable in a manner that was transparent to districts and easily communicated to the public. This system will be applied equally to Title I and non-Title I schools.

The A-F School Grading System is defined by 70 O.S. § 1210.545.
The grade of a school shall be based on a combination of the following:

1. Thirty-three percent (33%) on student test scores, including achievement on all criterion-referenced tests and end-of-instruction tests administered in the State;
2. Seventeen percent (17%) on student learning gains in reading and mathematics as measured by criterion-referenced tests and end-of-instruction tests used under the current federal accountability system;
3. Seventeen percent (17%) on improvement of the lowest twenty-fifth percentile of students in the school in reading and mathematics on the criterion-referenced tests and end-of-instruction tests used under the current federal accountability system, unless these students are exhibiting satisfactory performance;
4. Thirty-three percent (33%) on whole school improvement, which shall include:
    a. For schools comprised of high school grades:
        i. The percentage of students completing the State's college and career preparatory curriculum,
        ii. The high school graduation rate of the school,
        iii. Parent and community engagement factors,
        iv. School culture indicators,
        v. The performance and participation of students in College Board Advanced Placement courses, International Baccalaureate courses, concurrent enrollment courses, Advanced International Certificate of Education courses, and the achievement of students on national industry certification identified pursuant to rules adopted by the Board,
        vi. Postsecondary readiness of students as measured by the SAT or the ACT,
        vii. The high school graduation rate of students who scored at limited knowledge or unsatisfactory on the eighth-grade criterion-referenced tests in reading and mathematics,
        viii. The growth or decline in these components from year to year, and
        ix. Any other factors selected by the State Superintendent of Public Instruction, and
    b. For schools comprised of middle school grades and elementary school grades:
        i. The attendance rate of the school,
        ii. Parent and community engagement factors,
        iii. School culture indicators,
        iv. The drop-out rate of the school,
        v. The percentage of students who are taking higher level coursework at a satisfactory or higher level (for example, incentives for 8th Grade students successfully completing Algebra I and scoring Proficient or Advanced on the Algebra I End of Instruction test), and
        vi. Any other factors selected by the State Superintendent of Public Instruction.

Subsequent administrative rules will be written and adopted in early 2012 for implementation of the new A-F School Grading System beginning with the assessment results from the 2011-2012 school year. The SEA will explore best practices and consult with other states that have implemented A-F School Grading Systems, or comparable differentiated accountability systems, throughout the process of developing rules appropriate to Oklahoma. These rules will include details for implementation of the components listed in law. Such details include:

- How schools will receive credit for graduation rate based on a four-year adjusted cohort rate, when data is available, as well as how schools will receive credit for recovering dropouts who may take more than four years to complete a college-preparatory curriculum in order to graduate;

- How results from all assessments administered in the State will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards;
- How growth will be determined from results on reading/language arts and mathematics tests, including Algebra I and English II; and
- How whole school improvement factors will be weighted to ensure that the outcome of the A-F School Grading System will result in improved instructional practices and options for students.

The purpose of the A-F School Grading System is to provide incentives to schools for challenging all students to reach high levels of college and career readiness.

Upon implementation, all schools will be rank-ordered and the administrative rules will provide criteria for distinguishing schools as A, B, C, D, or F schools. These school grades will be shared publicly, through the State Board of Education, the media, and the SEA website. The school grades will also be recorded on the school's report card, which must be shared with the parents of students in the school and posted on the school's and LEA's websites.

Recognitions and Interventions

As opposed to the Accountability System currently in place for the 2011-2012 school year and that would continue to operate in the State in the absence of this ESEA waiver package, the State's new Differentiated Recognition, Accountability, and Support System will incentivize whole school improvements, while providing supports for all groups of students at all levels of performance. Sections 2.C, 2.D, 2.E, and 2.F provide detailed explanations of the recognitions and interventions that will be implemented in each school and district across the State to support educators in meaningful ways:

- Schools with the highest performance will be rewarded and will be encouraged to continue to push for higher C^3 expectations among all students (Section 2.C);
- Schools with high progress will be rewarded and will be supported as they continue to implement high quality instructional practices that will likely result in even more progress toward high achievement (Section 2.C);
- Schools with low achievement for the majority of students or low graduation rates will be required to implement Turnaround Principles with the greatest likelihood of improving student achievement within three years so that all students can meet C^3 expectations (Section 2.D);
- Schools with achievement gaps or graduation rate gaps between subgroups of students will be required to implement interventions targeted at the needs of those subgroups while pushing for higher C^3 expectations among the highest performing students (Section 2.E);
- Schools with low achievement for a significant number of students will be required to implement targeted interventions with the greatest likelihood of improving student achievement (Section 2.F); and
- All schools will be provided with resources to assist in making the wisest decisions about school funding, professional development opportunities, instructional materials, and educator effectiveness – all with the intent of meeting the State's goal that all students will graduate college, career, and citizen ready by 2020: C^3 by 2020 (Sections 2.F and 2.G).

"Grade +" and "Grade –"

As of July 2011, Oklahoma was home to 522 districts and 16 charter school districts, containing almost 1,800 school sites. To provide greater differentiation between them, schools and districts may earn a designation of "Grade +" or a "Grade –" based on additional criteria. This differentiation will allow school sites, LEAs, and the SEA to provide targeted recognitions and interventions based on the "all students" group as well as each subgroup, including ELLs and students with disabilities. The additional criteria include new annual measurable objectives (AMOs) as discussed in Section 2.B, implementation of the Teacher and Leader Effectiveness Evaluation System (TLE) as discussed in Sections 3.A and 3.B, and convergence of various school metrics.

AMOs (see Section 2.B): The new AMOs will exist for 10 groups of students, including the "all students" group and each of following subgroups when there are 25 or more students in the group: ELL Students, IEP Students, Regular Education Students, Black Students, American Indian Students, Hispanic Students, Asian Students, White Students, and Economically Disadvantaged Students. Each group of students will need to meet AMOs in four categories: mathematics performance and growth, reading performance and growth, assessment participation, and school indicator (graduation or attendance). In total, there are 40 AMOs for each school site.

In order to incentivize schools to strive for continuous improvement, high expectations for meeting AMOs have been set in order for schools to achieve a designation of "Grade +". To achieve an A+, schools must meet all 40 AMOs. Grades of B+, C+, and D+ require schools to meet at least 37, 34, and 31 AMOs respectively, in addition to other requirements. In other words, a school cannot receive any "Grade +" designation if the school misses AMOs in any category for all student groups.

In order to hold schools accountable for AMOs of subgroups in addition to the "all students" group used for determining the school grade, schools that do not meet a significant number of AMOs will receive a designation of "Grade –". The SEA used 95%, 85%, 75%, and 65% of the 40 AMOs to determine that a school would earn a designation of A-, B-, C-, or D- if the school made fewer than 38, 34, 30, and 26 AMOs respectively, in addition to other criteria.

TLE (see Sections 3.A and 3.B): The "Grade +" and "Grade –" designations are also dependent on the school's implementation of the TLE. In order for a school to get a designation of "Grade +", the majority of teachers must earn a rating of effective, highly effective, and superior, and no principals or assistant principals can be rated as ineffective or needs improvement.

Convergence: The various metrics used by schools for accountability should point in the same direction. Student achievement, graduation rate, teacher and leader ratings, student success factors, and growth in various measures should align. When significant discrepancies arise in school metrics, this could indicate that some or all metrics are not accurate. For example, if the majority of teachers and leaders in the school have ratings of effective, highly effective, and superior but the student achievement in that school is consistently low, there is an indication that teacher evaluations are not being implemented with fidelity. Significant discrepancies will prevent a school from receiving a designation of "Grade +".

The table below summarizes how a school may be given a "Grade +" or Grade –" designation.

	Grade +	Grade	Grade –
A	Must meet all criteria for a Grade of A and all following criteria: • Meet all AMOs in "All Students" and all subgroups; • Have majority of teachers rated Effective, Highly Effective, or Superior; • Have no principals or assistant principals rated as ineffective or needs improvement; and • Have no significant discrepancies between school accountability metrics.	Must meet all criteria for a Grade of A.	Must meet all criteria for a Grade of A and: • Miss 3 or more AMOs in "All Students" or any combination of subgroups; Or Must meet all criteria for a Grade of A and all of the following criteria: • Have no teachers rated Highly Effective or Superior; • Have at least one principal or assistant principal rated as ineffective or needs improvement; and • Have significant discrepancies between school accountability metrics.
B	Must meet all criteria for a Grade of B and all following criteria: • Miss 3 or fewer AMOs in "All Students" or any combination of subgroups; • Have majority of teachers rated Effective, Highly Effective, or Superior; • Have no principals or assistant principals rated as ineffective or needs improvement; and • Have no significant discrepancies between school accountability metrics.	Must meet all criteria for a Grade of B.	Must meet all criteria for a Grade of B and: • Miss 7 or more AMOs in "All Students" or any combination of subgroups; Or Must meet all criteria for a Grade of B and all of the following criteria: • Have no teachers rated Highly Effective or Superior; • Have at least one principal or assistant principal rated as ineffective or needs improvement; and • Have significant discrepancies between school accountability metrics.

C	Must meet all criteria for a Grade of C and all following criteria: • Miss 6 or fewer AMOs in "All Students" or any combination of subgroups; • Have majority of teachers rated Effective, Highly Effective, or Superior; • Have no principals or assistant principals rated as ineffective or needs improvement; and • Have no significant discrepancies between school accountability metrics.	Must meet all criteria for a Grade of C.	Must meet all criteria for a Grade of C and: • Miss 11 or more AMOs in "All Students" or any combination of subgroups; Or Must meet all criteria for a Grade of C and all of the following criteria: • Have no teachers rated Highly Effective or Superior; • Have at least one principal or assistant principal rated as ineffective or needs improvement; and • Have significant discrepancies between school accountability metrics.
D	Must meet all criteria for a Grade of D and all following criteria: • Miss 9 or fewer AMOs in "All Students" or any combination of subgroups; • Have majority of teachers rated Effective, Highly Effective, or Superior; • Have no principals or assistant principals rated as ineffective or needs improvement; and • Have no significant discrepancies between school accountability metrics.	Must meet all criteria for a Grade of D.	Must meet all criteria for a Grade of D and: • Miss 15 or more AMOs in "All Students" or any combination of subgroups; Or Must meet all criteria for a Grade of D and all of the following criteria: • Have no teachers rated Highly Effective or Superior; • Have at least one principal or assistant principal rated as ineffective or needs improvement; and • Have significant discrepancies between school accountability metrics.
F	F+ designations will not be made.	Must meet all criteria for a Grade of F.	F- designations will not be made.



Key Take Away for Section 2.A.i: Oklahoma's Differentiated Recognition, Accountability, and Support System will provide a coherent approach to continuous school improvement by holding schools accountable to preparing all students for college, career, and citizen readiness (C^3); by encouraging higher levels of growth each year; by integrating federally-required AMOs and reporting for all student groups with the school-wide performance indicators of the State's newly adopted A-F School Grading System; and by honoring both high achievement and significant progress of students, teachers, and schools.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	**Option B**
☐ The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	☒ If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

At the time of submission of this ESEA Flexibility Request, the State's newly adopted A-F School Grading System has not been implemented. Implementation will begin with the 2012-2013 school year; therefore, initial identification of Reward, Priority, and Focus Schools will be based on the methodology described in Sections 2.C, 2.D, and 2.E. Identification of Reward, Priority, and Focus Schools in future years will be based on the A-F School Grading System as explained at the end of each section. In addition, Oklahoma will be identifying additional schools for targeted interventions as described in 2.F.

Oklahoma will use results from all state administered assessments as part of its A-F School Grading System based on final administrative rules for implementation as described in Section 2.A. The State will use results from assessments in science, social studies, and writing, in addition to reading and mathematics to identify Reward Schools, with reading and mathematics assessments weighted more heavily as discussed in Section 2.C. Focus and Priority Schools for the 2012-2013 school year will be identified using only assessments in reading and mathematics. The State will implement the A-F School Grading System to identify additional Reward, Focus, and Priority Schools beginning in the 2012-2013 school year as described in Sections 2.C, 2.D, and 2.E. Results from each of the content areas assessed through the Oklahoma School Testing Program (OSTP) will be used for these additional identifications. By adding each of the content areas assessed though the OSTP, the criteria will match Oklahoma's district and site Report Card criteria while encouraging a comprehensive approach to college, career, and citizen readiness (C^3). Oklahoma desires to recognize and provide incentives to sites and districts that help students to increase success in all content areas and to be well prepared to meet and exceed college- and career-ready standards.

Oklahoma's 2011 Achievement

Results from all assessments administered through the OSTP during the 2010-2011 school year are provided. These include assessment results from general assessments (Oklahoma Core Curriculum Tests [OCCT] and End of Instruction [EOI]), modified assessments (Oklahoma Modified Alternate Assessment Program

[OMAAP]), and alternate portfolio assessments (Oklahoma Alternate Assessment Program [OAAP]). Subject matter assessments are given in the following:

- 3rd Grade Mathematics and Reading
- 4th Grade Mathematics and Reading
- 5th Grade Mathematics, Reading, Science, Social Studies, and Writing
- 6th Grade Mathematics and Reading
- 7th Grade Mathematics, Reading, and Geography
- 8th Grade Mathematics, Reading, Science, U.S. History, and Writing
- High School Algebra I, Algebra II, Biology I, English II, English III, Geometry, and U.S. History

Results for the "all students" group for the State from the 2010-2011 School Year are listed below.

		# Tested	Combined Percent Proficient	# Advanced	% Advanced	# Proficient/Satisfactory	% Proficient/Satisfactory	# Limited Knowledge	% Limited Knowledge	# Unsatisfactory	% Unsatisfactory
3rd Grade Mathematics	OCCT	43,661		11,631	27%	19,015	44%	9,229	21%	3,786	9%
	OMAAP	3,138		877	28%	1,508	48%	561	18%	192	6%
	OAAP	668		277	42%	344	52%	22	3%	25	4%
	TOTAL	**47,467**	**71%**	**12,785**	**27%**	**20,867**	**44%**	**9,812**	**21%**	**4,003**	**8%**
3rd Grade Reading	OCCT	43,065		1,797	4%	28,386	66%	7,697	18%	5,185	12%
	OMAAP	3,748		1,026	27%	1,297	35%	983	26%	442	12%
	OAAP	663		128	19%	449	68%	73	11%	13	2%
	TOTAL	**47,476**	**70%**	**2,951**	**6%**	**30,132**	**63%**	**8,753**	**18%**	**5,640**	**12%**
4th Grade Math	OCCT	43,195		11,257	26%	19,837	46%	7,689	18%	4,412	10%
	OMAAP	3,492		799	23%	1,819	52%	612	18%	262	8%
	OAAP	653		221	34%	320	49%	87	13%	25	4%
	TOTAL	**47,340**	**72%**	**12,277**	**26%**	**21,976**	**46%**	**8,388**	**18%**	**4,699**	**10%**
4th Grade Reading	OCCT	42,491		1,689	4%	25,352	60%	8,726	21%	6,724	16%
	OMAAP	4,149		1,703	41%	1,287	31%	1,014	24%	145	3%
	OAAP	650		79	12%	447	69%	115	18%	9	1%
	TOTAL	**47,290**	**64%**	**3,471**	**7%**	**27,086**	**57%**	**9,855**	**21%**	**6,878**	**15%**
5th Grade Math	OCCT	42,605		10,257	24%	19,418	46%	8,907	21%	4,023	9%
	OMAAP	4,051		906	22%	1,907	47%	809	20%	429	11%
	OAAP	629		252	40%	309	49%	38	6%	30	5%
	TOTAL	**47,285**	**70%**	**11,415**	**24%**	**21,634**	**46%**	**9,754**	**21%**	**4,482**	**9%**
5th Grade Reading	OCCT	42,407		3,794	9%	24,724	59%	9,007	21%	4,682	11%
	OMAAP	4,432		1,527	34%	1,480	33%	1,259	28%	166	4%
	OAAP	625		63	10%	457	73%	95	15%	10	2%
	TOTAL	**47,464**	**67%**	**5,384**	**11%**	**26,661**	**56%**	**10,361**	**22%**	**4,858**	**10%**

5th Grade Writing	OCCT	47,478		4,215	9%	32,922	69%	6,706	14%	3,635	8%
	OAAP	615		124	20%	424	69%	51	8%	16	3%
	TOTAL	**48,093**	**78%**	**4,339**	**9%**	**33,346**	**69%**	**6,757**	**14%**	**3,651**	**8%**
5th Grade Science	OCCT	43,171		13,032	30%	25,369	59%	3,845	9%	925	2%
	OMAAP	3,435		695	20%	2,071	60%	544	16%	126	4%
	OAAP	616		188	31%	317	52%	65	11%	46	8%
	TOTAL	**47,222**	**88%**	**13,915**	**29%**	**27,757**	**59%**	**4,454**	**9%**	**1,097**	**2%**
5th Grade Social Studies	OCCT	46,500		11,019	24%	21,659	47%	8,135	17%	5,687	12%
	OAAP	612		48	8%	324	53%	207	34%	33	5%
	TOTAL	**47,112**	**70%**	**11,067**	**23%**	**21,983**	**47%**	**8,342**	**18%**	**5,720**	**12%**
6th Grade Math	OCCT	41,976		7,410	18%	20,720	49%	6,435	15%	7,411	18%
	OMAAP	4,009		700	17%	2,284	57%	812	20%	213	5%
	OAAP	546		253	46%	250	46%	30	6%	13	2%
	TOTAL	**46,531**	**68%**	**8,363**	**18%**	**23,254**	**50%**	**7,277**	**16%**	**7,637**	**16%**
6th Grade Reading	OCCT	41,451		3,938	10%	22,960	55%	8,444	20%	6,109	15%
	OMAAP	4,181		1,875	45%	1,035	25%	1,175	28%	96	2%
	OAAP	545		192	35%	214	39%	89	16%	50	9%
	TOTAL	**46,177**	**65%**	**6,005**	**13%**	**24,209**	**52%**	**9,708**	**21%**	**6,255**	**14%**
7th Grade Math	OCCT	41,325		7,909	19%	20,211	49%	5,340	13%	7,865	19%
	OMAAP	4,044		595	15%	1,345	33%	1,882	47%	222	5%
	OAAP	555		196	35%	278	50%	48	9%	33	6%
	TOTAL	**45,924**	**66%**	**8,700**	**19%**	**21,834**	**48%**	**7,270**	**16%**	**8,120**	**18%**
7th Grade Reading	OCCT	41,341		6,892	17%	22,651	55%	5,347	13%	6,451	16%
	OMAAP	4,082		988	24%	1,662	41%	1,358	33%	74	2%
	OAAP	563		119	21%	295	52%	77	14%	72	13%
	TOTAL	**45,986**	**71%**	**7,999**	**17%**	**24,608**	**54%**	**6,782**	**15%**	**6,597**	**14%**
7th Grade Geography	OCCT	45,148		8,409	19%	28,127	62%	7,183	16%	1,429	3%
	OAAP	547		52	10%	271	50%	169	31%	55	10%
	TOTAL	**91,681**	**76%**	**16,460**	**18%**	**53,006**	**58%**	**14,134**	**15%**	**8,081**	**9%**
8th Grade Math	OCCT	39,734		10,230	26%	16,370	41%	8,403	21%	4,731	12%
	OMAAP	3,796		559	15%	1,566	41%	1,399	37%	272	7%
	OAAP	463		141	31%	270	58%	36	8%	16	4%
	TOTAL	**43,993**	**66%**	**10,930**	**25%**	**18,206**	**41%**	**9,838**	**22%**	**5,019**	**11%**
8th Grade Reading	OCCT	39,801		5,896	15%	24,777	62%	5,242	13%	3,886	10%
	OMAAP	3,848		1,039	27%	1,911	50%	659	17%	239	6%
	OAAP	463		112	24%	250	54%	80	17%	21	5%
	TOTAL	**44,112**	**77%**	**7,047**	**16%**	**26,938**	**61%**	**5,981**	**14%**	**4,146**	**9%**
8th Grade Writing	OCCT	44,706		5,694	13%	32,276	72%	3,728	8%	3,008	7%
	OAAP	456		43	9%	315	69%	74	16%	24	5%
	TOTAL	**45,162**	**85%**	**5,737**	**13%**	**32,591**	**72%**	**3,802**	**8%**	**3,032**	**7%**

8th Grade Science	OCCT	40,657		7,455	18%	29,052	71%	3,154	8%	996	2%
	OMAAP	2,997		531	18%	2,370	79%	70	2%	26	1%
	OAAP	445		81	18%	240	54%	103	23%	21	5%
	TOTAL	**44,099**	**90%**	**8,067**	**18%**	**31,662**	**72%**	**3,327**	**8%**	**1,043**	**2%**
8th Grade U.S. History	OCCT	43,577		6,092	14%	25,064	58%	9,609	22%	2,812	6%
	OMAAP										
	OAAP	454		117	26%	236	52%	79	17%	22	5%
	TOTAL	**44,031**	**72%**	**6,209**	**14%**	**25,300**	**57%**	**9,688**	**22%**	**2,834**	**6%**
Algebra I	EOI	38,360		12,487	33%	18,312	48%	5,274	14%	2,287	6%
	OMAAP	4,389		1,838	42%	2,261	52%	278	6%	12	0%
	OAAP	632		184	29%	308	49%	119	19%	21	3%
	TOTAL	**43,381**	**82%**	**14,509**	**33%**	**20,881**	**48%**	**5,671**	**13%**	**2,320**	**5%**
Algebra II	EOI	30,936		7,891	26%	12,548	41%	5,871	19%	4,626	15%
	OAAP	54		9	17%	19	35%	15	28%	11	20%
	TOTAL	**30,990**	**66%**	**7,900**	**25%**	**12,567**	**41%**	**5,886**	**19%**	**4,637**	**15%**
Biology I	EOI	37,110		13,243	36%	16,146	44%	5,287	14%	2,434	7%
	OMAAP	3,835		1,463	38%	1,367	36%	946	25%	59	2%
	OAAP	541		55	10%	333	62%	116	21%	37	7%
	TOTAL	**41,486**	**79%**	**14,761**	**36%**	**17,846**	**43%**	**6,349**	**15%**	**2,530**	**6%**
English II	EOI	36,230		12,962	36%	18,485	51%	4,306	12%	497	1%
	OMAAP	3,793		2,382	63%	1,045	28%	334	9%	32	1%
	OAAP	549		174	32%	270	49%	64	12%	41	8%
	TOTAL	**40,572**	**87%**	**15,518**	**38%**	**19,800**	**49%**	**4,704**	**12%**	**570**	**1%**
English III	EOI	36,695		10,414	28%	20,646	56%	2,577	7%	3,058	8%
	OAAP	207		88	43%	65	31%	45	22%	9	4%
	TOTAL	**36,902**	**85%**	**10,502**	**28%**	**20,711**	**56%**	**2,622**	**7%**	**3,067**	**8%**
Geometry	EOI	39,342		14,652	37%	16,246	41%	5,856	15%	2,588	7%
	OAAP	129		35	27%	60	47%	19	15%	15	12%
	TOTAL	**39,471**	**78%**	**14,687**	**37%**	**16,306**	**41%**	**5,875**	**15%**	**2,603**	**7%**
U.S. History	EOI	34,494		16,509	48%	10,289	30%	6,399	19%	1,297	4%
	OMAAP	3,174		806	25%	1,048	33%	763	24%	557	18%
	OAAP	430		76	18%	248	58%	85	20%	21	5%
	TOTAL	**38,098**	**76%**	**17,391**	**46%**	**11,585**	**30%**	**7,247**	**19%**	**1,875**	**5%**



Key Take Away for Section 2.A.ii: Although statewide proficiency rates have increased at the same time that higher expectations are being implemented for all students, Oklahoma is not complacent. Oklahomans expect that our students will perform among the best in the nation, so the SEA is setting ambitious AMOs for the "all students" group and each subgroup of students as detailed in Section 2.B. Striving to meet the new AMOs and attain higher grades through the A-F School Grading System, schools and districts will push for higher rates of Proficient/Satisfactory and Advanced on all state assessments.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups. (Attachment 8)

The AMOs will consist of four major components: a Mathematics Index, a Reading Index, a Participation Index, and a School Indicator Index. The factors that contribute to each index will differ by school level.

High Schools and K-12 District AMOs will consist of the following factors:

- Mathematics Index
- Reading Index
- Participation Index
- Graduation Index

Elementary, Middle School, and K-8 District AMOs will consist of the following factors:

- Mathematics Index
- Reading Index
- Attendance Index
- Participation Index

Definitions

Mathematics Index: The Mathematics Index is calculated using three components: a performance component, a growth component for all students, and a growth component for the bottom 25% of students. The components are weighted as they are in the calculations for the State Report Cards. The test score performance is weighted as 50% of the Index, the growth of all students is weighted as 25% of the Index and the growth of the lowest 25% of students is weighted as 25% of the Index. Only Full Academic Year (FAY) students are included in the computation of the Index. Students receive 3 points for achieving Advanced, 3 points for achieving Proficient/Satisfactory, 2 points for achieving Limited Knowledge, and 1 point for achieving Unsatisfactory. The rationale for awarding the same points for advanced and proficient in the AMOs is to ensure that schools are not able to use advanced scores to statistically mitigate for students performing below grade level. Schools will be awarded additional points in the A-F School Grading System for students scoring advanced on state assessments. The Mathematics Index is calculated for Grades 3-8 Mathematics or Algebra I assessment. The points for each student are summed and converted to a standard score ranging from 20 to 80 points.

The total growth component is calculated by comparing the previous year's OCCT math score to the current year's OCCT math score for all FAY students. At the high school level, the 8th Grade OCCT math score is compared to the Algebra I EOI score for all FAY students. Students receive one point if they remain proficient in both years or advanced in both years. Students receive one point if they move from Unsatisfactory to Limited Knowledge, if they move from Limited Knowledge to Proficient, or if they move from Proficient to Advanced. Students receive 2 points if they move from Unsatisfactory to Proficient or if they move from Limited Knowledge to Advanced. Students receive 3 points if they move from Unsatisfactory to Advanced. See the Table below. The total number of math points received for a site or district is summed and divided by the total number of students with two years of math test scores. This number is converted to a standard score ranging from 20 to 80 points.

The bottom 25% growth component is calculated in the same manner as the total growth component for those students who are ranked in the lowest 25% of the Oklahoma Performance Index (OPI) scores in the previous year's mathematics OCCT score. This number is converted to a standard score ranging from 20 to 80 points.

The Math Index is calculated using the formula below. The Math Index is a standard score ranging from 80 to 320.

Index = 2 (Performance Component) + (Total Growth Component) + (Bottom 25% Growth Component)

		Current Year's Test Score			
		Unsatisfactory	**Limited Knowledge**	**Satisfactory/ Proficient**	**Advanced**
Previous Year's Test Score	**Unsatisfactory**	0	1	2	3
	Limited Knowledge	0	0	1	2
	Satisfactory/ Proficient	0	0	1	1
	Advanced	0	0	0	1

Reading Index: In a similar manner as the Mathematics Index, the Reading Index is calculated using three components: a performance component, a growth component for all students, and a growth component for the bottom 25% of students. The components are weighted as they are in the calculations for the Site Report Cards. The test score performance is weighted as 50% of the Index, the growth of all students is weighted as 25% of the Index and the growth of the lowest 25% of students is weighted as 25% of the Index. Only Full Academic Year (FAY) students are included in the computation of the Index. Students receive 3 points for achieving Advanced, 3 points for achieving Proficient/Satisfactory, 2 points for achieving Limited Knowledge, and 1 point for achieving Unsatisfactory. The rationale for awarding the same points for advanced and proficient in the AMOs is to ensure that schools are not able to use advanced scores to statistically mitigate for students performing below grade level. Schools will be awarded additional points in the A-F School Grading System for students scoring advanced on state assessments. The Reading Index is calculated for Grades 3-8 Reading OCCT or English II EOI assessment. The points for each student are summed and converted to a standard score ranging from 20 to 80 points.

The total growth component is calculated by comparing the previous year's OCCT reading score to the current year's OCCT reading score for all FAY students. At the high school level, the 8th Grade OCCT reading score is compared to the English II EOI score for all FAY students. Students receive one point if they remain proficient in both years or advanced in both years. Students receive one point if they move from Unsatisfactory to Limited Knowledge, if they move from Limited Knowledge to Proficient, or if they move from Proficient to Advanced. Students receive 2 points if they move from Unsatisfactory to Proficient or if they move from Limited Knowledge to Advanced. Students receive 3 points if they move from Unsatisfactory to Advanced. See the Table above. The total number of reading points received for a school or district is summed and divided by the total number of students with two years of math test scores. This number is converted to a standard score ranging from 20-80 points.

The bottom 25% growth component is calculated in the same manner as the total growth component for those students who are ranked in the lowest 25% of the OPI scores in the previous year's reading OCCT scores. This number is converted to a standard score ranging from 20-80 points.

The Reading Index is calculated using the formula below. The Reading Index is a standard score ranging from 80 to 320.

Index = 2 (Performance Component) + (Total Growth Component) + (Bottom 25% Growth Component)

Participation Index: The Participation Index is calculated as a ratio of students who took the OCCT/EOI over the number of students enrolled during the time of testing.

Graduation Index: The Graduation Index is calculated using the currently approved graduation rate as shown below because Oklahoma cannot use the 4 year adjusted cohort rate until information is collected in the State's longitudinal data system (see Oklahoma's Accountability Workbook at http://www.sde.state.ok.us/NCLB/pdf/API_AYP/AcctWork.pdf). Once the data is available, the Graduation Index will be calculated using a 4 year adjusted cohort rate.

Beginning in 2005-2006, the graduation rate will be calculated using an estimated cohort group rate which is a recommended method by the National Center of Educational Statistics. The calculation is listed below:

$$\frac{\text{Number of Students Graduating in the standard number of years (4) with a Regular Diploma including summer graduates in (current year – 1)}}{\text{*Total number of Students Graduating with a Regular Diploma including summer graduates in (current year – 1)} + \text{Number of Grade 12 Dropouts in (current year – 1)} + \text{Number of Grade 11 Dropouts in (current year – 2)} + \text{Number of Grade 10 Dropouts in (current year – 3)} + \text{Number of Grade 9 Dropouts in (current year – 4)} + \text{Number Receiving GEDs}} \times 100$$

*Total number of graduates includes those students who have continued in school beyond the standard number of years and graduated.
Also, the graduation rate will be disaggregated by student group by 2005-2006.

Attendance Index: The Attendance Index is calculated by taking the average daily attendance divided by the average daily membership.

Criteria for AMOs

Each AMO will be applied to the achievement of the "all students" group and each of following subgroups when there are 25 or more students in the group: ELL Students, IEP Students, Regular Education Students, Black Students, American Indian Students, Hispanic Students, Asian Students, White Students, and Economically Disadvantaged Students.

Mathematics AMO: Districts or sites will achieve the Mathematics AMO if they receive a Mathematics Index score of 300, or if they increase their score by 15% of the difference between their previous year's score and 320.

Reading AMO: Districts or sites will achieve the Reading AMO if they receive a Reading Index score of 300, or if they increase their score by 15% of the difference between their previous year's score and 320.

Participation AMO: Districts or sites will achieve the Participation Index AMO if they test 95% or more of their students. This mirrors the current AYP criteria.

Graduation AMO: For the 2010-2011 school year, districts and sites achieved the Graduation Index AMO if their graduation rate met or exceeded 67.8%. Districts or sites will achieve the Graduation Index AMO if their graduation rate reaches or exceeds 82% in 2011-2012, 85% in 2012-2013, and 87% in 2013-2014; or if their graduation rate improves by 10% of the difference between 100% and the previous year's rate.

Attendance Index AMO: For the 2010-2011 school year, districts and sites achieved the Attendance Index AMO if their attendance rate met or exceeded 91.2%. Districts or sites will achieve the Attendance Index if their attendance rate meets or exceeds 92% in 2011-2012, 94% in 2012-2013, and 95% in 2013-2014. Attendance can also include proficiency on online courses as measured by completed course work and test results.

Rationale for the new AMOs

Oklahoma's new AMOs set achievable and ambitious goals for the State's districts and sites. The Performance Components of both the Mathematics and Reading Indices focus efforts to increase the number of students who are proficient in reading and mathematics until all students meet this high standard of readiness for college, careers, and citizenship (C^3). The Growth Components allow for recognition for districts and sites that are helping students increase their learning. Combining both performance and growth for the "all students" group and for all subgroups provides the needed information to see how well each subgroup is progressing and allows supports to be offered to target the areas and students in most need of assistance. The Graduation Index and Attendance Index AMOs require districts and schools to push for continually higher expectations. The Participation Index remains the same as the current AYP criteria.

The new AMOs reflect Oklahoma's new state reporting system that provides each district and site with a grade of A-F. By using the same kind of criteria for AMOs as well as the state accountability system, a consistent message is given to all educators in the State.

Statewide Proficiency

See Attachment 8 for the average statewide proficiency based on assessments administered in the 2010-2011 school year in reading/language arts and mathematics for the "all students" group and all subgroups.



Key Take Away for Section 2.B: Oklahoma's new AMOs set achievable and ambitious goals for the State's districts and sites for the "all students" group and all subgroups. Since the AMOs are integrated into the State's Differentiated Recognition, Accountability, and Support System, the AMOs will provide information for the SEA, LEA, and schools to provide targeted interventions while pushing for continuous growth of all students.

2.C REWARD SCHOOLS

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

At the time of submission of this ESEA Flexibility Request, the State's newly adopted A-F School Grading System has not been implemented. Implementation will begin with the 2012-2013 school year; therefore, initial identification of Reward Schools will be based on the methodology described below. Identification of Reward Schools in future years will be based on the A-F School Grading System as explained at the end of this section.

Initial Year (In 2011): In order to identify schools as highest-performing or high-progress schools (i.e., Reward Schools), the State will include scores on the most recent administrations as well as prior administrations of the state assessments in reading, mathematics, science, social studies, and writing. These include assessments of Grades 3-8 reading and mathematics, Grades 5 and 8 writing, Grades 5 and 8 science, Grade 5 social studies, Grade 7 geography, Grade 8 U.S. History, and at the high school level, Algebra I, Algebra II, Biology I, English II, English III, Geometry, and U.S. History for the "all students" group and for all subgroups, including students with disabilities and English Learners, administered during the 2010-2011 school year and prior school years as identified below.

Highest-Performing (See Table 2, Key A): In Oklahoma, all Title I and all non-Title I schools will have an opportunity to be named as highest-performing Reward Schools. All schools in the State will be rank-ordered based on the following criteria for each school year listed:

- For the 2010-2011 school year, for each of the assessments listed above, all students scoring advanced will receive 4 points, all students scoring proficient will receive 3 points, all students scoring limited knowledge will receive 2 points, and all students scoring unsatisfactory will receive 1 point. Each school's total score will be determined by:
  - 30% coming from mathematics assessments used in the prior accountability system (Grades 3-8 mathematics and Algebra I) – the total number of points received will be divided by the number of mathematics assessments given in that year.
  - 30% coming from reading assessments used in the prior accountability system (Grades 3-8 reading and English II) – the total number of points received will be divided by the number of reading assessments given in that year.
  - 40% coming from all other assessments listed above – the total number of points received will be divided by the number of all of the other assessments given in that year.
  - If the grade configuration of the school does not include assessments other than reading and mathematics, the school's total score will be determined by weighting mathematics as 50% and reading as 50% of the score.
  - In both cases a total score between 1 and 4 will be calculated for each school being ranked.
- For the 2009-2010 and 2008-2009 school years, the same process will be followed.

To ensure compliance with the *ESEA Flexibility* definition of Reward Schools, schools in the top 10% of Title I and non-Title I schools in each of the three years will be named as Reward Schools if the following conditions are also met:

- For high schools, the school has a graduation rate for the 2009-2010 school year (reported in the 2010-2011 school year) of 82.4% or higher.
- The school made AYP in 2010-2011 in the "all students" group and all of its subgroups.
- The school does not have any significant achievement gaps between subgroups that are not closing.
- The school cannot be identified as a Priority School or a Focus School under any criteria.

In addition, beginning in 2012, any Title I or non-Title I school that is identified as an A or A+ school based on the State's A-F Grading System as defined by Oklahoma Statute Title 70 Section 1210.545 and subsequent Oklahoma Administrative Code will be identified as a highest-performing Reward School.

High-Progress (See Table 2, Key B): In Oklahoma, all Title I and non-Title I schools will have an opportunity to be named as a high-progress Reward School. All schools in the State will be considered based on the following criteria:

- For the 2010-2011 school year, based only on the assessments used in the prior accountability system (Grades 3-8 reading and mathematics, Algebra I, and English II), all students scoring advanced will receive 4 points, all students scoring proficient will receive 3 points, all students scoring limited knowledge will receive 2 points, and all students scoring unsatisfactory will receive 1 point. For each school, the total number of points received will be divided by the number of these assessments given in that year in that school.
- For the 2009-2010 and 2008-2009 school years, the same process will be followed. (The 2008-2009 assessment data will serve as a baseline to show progress over two years ending in 2010-2011.)
- Schools will be rank-ordered based on the difference between the 2008-2009 data and the 2010-2011 data.

To ensure compliance with the *ESEA Flexibility* definition of Reward Schools, Title I schools in the top 10% of Title I and non-Title I schools will be named as Reward Schools if the following conditions are also met:

- The school's progress is consistent in growth over the time period.
- The school has not declined from its highest performance during the two-year period.
- For high schools, the school is in the top 20% of schools with the largest gains in graduation rate between 2007-2008 and 2009-2010.
- The school does not have any significant achievement gaps between subgroups that are not closing.
- The school cannot be identified as a Reward School if it has received a School Improvement Grant (SIG).

Subsequent Years (Beginning in 2012): any Title I school that ranks in the top 10% of Title I schools as well as any Title I or non-Title I school that ranks in the top 10% of all schools based on the growth components of the State's A-F Grading System, as defined by Oklahoma Statute Title 70 Section 1210.545 and subsequent Oklahoma Administrative Code, will be identified as a high-progress Reward School.

2.C.ii Provide the SEA's list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

LEAs, teachers, and the public developed the following ideas regarding appropriate recognitions and rewards:

- Give as many non-financial rewards as possible since financial rewards may not always be available. These include, but are not limited to:
  - Increased autonomy as it relates to state and federal flexibility,
  - Public notification of designation, and
  - Opportunities to serve as advisors to the SEA.
- If funding is available for rewards, grant more reward for progress than for absolute performance. Grant a greater percentage of financial reward for schools with the highest poverty rates.

- Make grant opportunities available for Reward Schools that are willing to partner with Priority Schools, Focus Schools, and schools earning grades of C, D, or F in the State's A-F School Grading System to assist both schools in continuous improvement.
- Encourage businesses and philanthropic organizations to recognize Reward Schools financially, including offering scholarships to students who graduate from Reward Schools and to children of educators employed by Reward Schools.

Based on this input, the SEA has established the plan shown below for recognizing and rewarding Reward Schools.



Key Take Away for Section 2.C: Incentives for school improvement are as equally important as consequences for lack of school improvement. Section 2.C seeks to identify and provide meaningful rewards to schools that are reaching goals for student performance and student growth. Meaningful rewards were selected based on their likelihood to encourage other schools to work toward obtaining Reward School status.

Key Milestone or Activity	Detailed Timeline	Party or Parties Responsible	Evidence (Attachment)	Resources (*e.g.*, staff time, additional funding)	Significant Obstacles
Honor all Reward Schools at State Board of Education Meeting	First State Board Meeting following acceptance of Request; Annually at first meeting of the school year	Assistant State Superintendent, Office of Student Support		Staff Time Certificates/Plaques	None
Create a Press Release listing all Reward Schools	Within 15 days of acceptance of Request; Annually in conjunction with first State Board Meeting of the school year	Communications Director		Staff Time	None
Recognize Reward Schools through REAC^{3}H Network	Ideally, at January Summit, but no later than May Summit; Annually	Deputy Superintendent		Staff Time	None
Ensure that all Reward Schools are included in State Superintendent's Listening Tour	By the end of the 2012-2013 school year	Event Coordinator		Staff Time Travel Costs	Time – May have to conduct regionally
Request citations from Governor and State Legislators	Within 30 days of acceptance of request; Annually	Legislative Liaison		Staff Time	None
Conduct a "Reward School Day at the Capitol" for recognition by the Legislature and the Governor during Legislative Session	February-May 2012; Annually	Legislative Liaison		Staff Time	None
Ensure that all Reward Schools are represented through various advisory groups and councils	Beginning with the 2012-2013 school year	Assistant State Superintendent, Office of Student Support		Staff Time	None

Invite Reward Schools to provide training sessions at statewide conferences and regional workshops	June 2012 and following	Assistant State Superintendent, Office of Instruction		Staff Time	None
Provide more autonomy regarding state and federal funds to LEAs with one or more Reward Schools if the LEA can demonstrate that the flexible use of funds will lead to greater results in the Reward Schools and the other schools in the LEA	July 1, 2012	Assistant State Superintendent, Office of Federal Programs Comptroller Legislative Liaison		Significant staff time for training on flexible uses of funds Technical Assistance Costs	This will require more autonomy for the SEA from ED, including relaxed expectations on budget approvals and monitoring of LEAS with Reward Schools. This will also require changes to state law regarding specific requirements on uses of funds.
Exempt Reward Schools from annual monitoring of certain accreditation requirements and certain site plans (to be determined)	July 1, 2012	Executive Director of Accreditation Deputy Superintendent		Staff Time	Review and potential revision of state statutes and state administrative codes.
Provide financial rewards to Reward Schools – with an emphasis on high-progress schools and high-poverty schools – if funding is available	Within 60 days of acceptance of Request; Annually	Assistant State Superintendent, Office of Federal Programs Comptroller		Staff Time Federal funds designated for recognition programs State Funds	Funding may not be available.

Offer grant opportunities to Reward Schools willing to partner with Priority Schools, Focus Schools, or schools earning grades of C, D, or F in the State's A-F School Grading System within the same LEA or in surrounding LEAs to assist all partner schools with continuous improvement	2012-2013 school year	Assistant State Superintendent, Office of Federal Programs Assistant State Superintendent, Office of Student Support		Federal funds designated for recognition programs Federal funds designated for improving teacher and principal quality State Funds	Funding may not be available.
Establish a School Recognition and Support Registry for businesses, community organizations, and philanthropic organizations to engage with schools specific to their needs for continuous improvement	2011-2012 school year	Executive Director of Parent and Community Engagement		Staff Time Community Funds	None

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

At the time of submission of this ESEA Flexibility Request, the State's newly adopted A-F School Grading System has not been implemented. Implementation will begin in the 2012-2013 school year; therefore, initial identification of Priority Schools will be based on the methodology described below. Identification of Priority Schools in future years will be based on the A-F School Grading System as explained at the end of this section.

Initial Year (In 2011): In order to identify schools as lowest-performing (i.e., Priority Schools), the State will include scores on the most recent administrations as well as prior administrations of the state assessments in reading and mathematics used in the prior accountability system. These include assessments of Grades 3-8 reading and mathematics, and at the high school level, Algebra I and English II for the "all students" group, which includes students with disabilities and English Learners, administered during the 2010-2011 school year and prior years as defined in the high-progress Reward School identification.

The SEA chose not to include science, social studies, and writing in the initial identification of Priority Schools based on feedback from LEAs that it would be unfair to identify schools and require interventions aligned with the Turnaround Principles based on 2010-2011 assessment data in subjects that were not used in the Accountability System that was in place for the 2010-2011 school year. (See the end of this section for how this identification will differ beginning in 2012-2013.)

In 2010-2011, the State had 1208 Title I schools; therefore, the State will identify at least 60 Title I schools (5%) as Priority Schools. In addition, Oklahoma will identify non-Title I schools with student achievement that is comparable to the Title I schools identified.

Category 1 (See Table 2, Key C): All Title I and non-Title I schools in the State will be rank-ordered based on the following criterion:

- For the 2010-2011 school year, based only on the assessments used in the prior accountability system (Grades 3-8 reading and mathematics, Algebra I, and English II), all students scoring advanced will receive 4 points, all students scoring proficient will receive 3 points, all students scoring limited knowledge will receive 2 points, and all students scoring unsatisfactory will receive 1 point. For each school, the total number of points received will be divided by the number of these assessments given in that year in that school.

Schools will be ranked by grade span served: elementary, middle/junior high, or high school. Any Title I school in the bottom 5% of Title I schools as well as any school in the bottom 5% of all schools (Title I and non-Title I) in each grade span for the 2010-2011 school year will be named as a Priority School unless the school has been named as a high-progress Reward School, which would indicate that the school has *not* demonstrated a lack of progress on those assessments over a number of years in the "all students" group.

Category 2 (See Table 2, Key D): Each Title I-participating high school, Title I-eligible high school, and non-Title I high school in the State with a graduation rate below 60% for three consecutive years (2007-2008, 2008-2009, and 2009-2010) will be named as a Priority School. If the total number of these schools exceeds 25% of the Priority School identifications, the schools with the lowest graduation rate average for these three years will be identified as Priority Schools. The remainder of the high schools with a graduation rate below 60% for three consecutive years will be identified as Focus Schools as described in Section 2.E.

Category 3 (See Table 2, Key E): All Tier I schools receiving School Improvement Grant (SIG) funds to implement a school intervention model will be named as Priority Schools.

Subsequent Years (Beginning in 2012): Any Title I or non-Title I school that is identified as an F school based on the State's A-F School Grading System as defined by Oklahoma Statute Title 70 Section 1210.545 and subsequent Oklahoma Administrative Code will be identified as a Priority School. This identification will include student achievement on all state assessments as well as other school and student achievement factors related to college, career, and citizen readiness (C^3).

2.D.ii Provide the SEA's list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

The SEA is committed to closing all achievement gaps and delivering on the State's goal that each student will graduate from high school ready for college, careers, and citizenship (C^3) by the year 2020: C^3 by 2020. To accomplish this goal, Priority Schools must make profound improvement in student achievement and graduation rate. LEAs with identified Priority Schools will be required to implement the Turnaround Principles defined in this ESEA waiver package.

LEAs must demonstrate that the LEA has the capacity to support dramatic improvement in the Priority School within three years and that the district leadership has a viable plan for facilitating improvement at the site. As part of the demonstration of capacity, the LEA must commit to implementing the Turnaround Principles in the 2012-2013 school year, and for at least the following two school years, for each Priority School in the LEA. The SEA will support LEAs that are able to demonstrate this capacity as they implement the Turnaround Principles.

LEAs that are unable to demonstrate capacity and the ability to facilitate improvement will relinquish control of all aspects of a Priority School's operations that directly or indirectly relate to student achievement to the SEA to be included in a theoretical, geographically-unbound group of schools, known as the C^3 Schools (C3S). The State Board of Education and the State Superintendent of Public Instruction will assume control of the operations and management for schools designated as C3S as they directly or indirectly relate to student achievement; however, during the period of time that the school operates as part of the C3S, the school retains its country-district-site code. Additionally, during this period of time, the SEA will collaborate with the LEA personnel in order to enhance the capacity of the LEA and the local school board for the future success of the school when the school is returned to full control of the LEA. The intent of these activities is to enable the LEA to deliver improved services to all schools within the LEA.

Funding for the C3S schools will come from state and federal revenues that would have been allocated to the school through the LEA to ensure that funding follows the students being served. This includes all formula and competitive funds, including SIG funds if the Priority School was previously awarded a School Improvement Grant to implement a school intervention model. In addition, the State Board of Education may choose to reserve a percentage, not to exceed 20%, of the LEA's Title I, Part A allocation to allow the SEA to begin or continue implementing the Turnaround Principles in C3S Priority Schools in the LEA.

Title I or Title I-eligible Priority Schools that are not operating Title I Schoolwide Programs may begin operating Schoolwide Programs since the LEA or C3S will be implementing interventions consistent with the Turnaround Principles, according to procedures established by the Office of Federal Programs at the SEA. To the extent allowable, the SEA will require the LEA to provide Title I funding to Title I-eligible Priority Schools that are not being served with Title I funds to ensure that necessary funding is available to support Turnaround Principles. In addition, the Priority Schools that implement one of the four SIG-approved

intervention models may apply to use SIG funds to implement those models, as funding exists.

The State Board of Education may choose to review and approve the total operating budgets of all LEAs within which a Priority School exists to ensure that appropriate funds are being spent on improvements in the Priority School.

Implementation of Turnaround Principles in the C3S: For those Priority Schools under the control of the C3S, the State Board of Education may choose to contract with an Educational Management Organization (EMO) or appoint appropriate leadership to operate the schools in the C3S, according to the following Turnaround Principles:

- The EMO or appointed leadership shall review the performance of every principal, using established criteria, to determine if the principal has the skills, abilities, and leadership qualities to serve as an instructional leader in the school. Any principal who does not have the skills, abilities, and leadership qualities necessary to lead the turnaround efforts will be replaced.
- The principal of each Priority School shall be provided autonomy to the greatest extent possible and will be given operational flexibility in the areas of scheduling, staff, curriculum, and budget. The principal will report to the EMO or appointed leadership and the State Superintendent of Public Instruction.
- In conjunction with the EMO or appointed leadership, the principal of each Priority School shall (a) review the qualities of all staff, using established criteria, and retain only those who are determined to be effective and have the ability to be successful in the turnaround effort; and (b) prevent ineffective teachers from being hired or transferred to the school.
- In conjunction with the EMO or appointed leadership, the principal of each Priority School shall ensure that all teachers have high-quality, job-embedded, ongoing professional development informed by the TLE that is aligned with teacher and student needs.
- In conjunction with the EMO or appointed leadership, the principal of each Priority School shall design the school day, week, and year to include additional time for student learning and teacher collaboration.
- The principal of each Priority School shall serve as instructional leader, strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned to CCSS and the State's standards, the *Priority Academic Student Skills (PASS)*.
- The principal of each Priority School along with a team of teacher leaders shall participate in state-provided training in the Oklahoma Data Review Model. The principal of each Priority School and all teachers within each Priority School shall participate in regular reviews of data to inform instruction and for continuous improvement. This will require providing time for collaboration on the use of data.
- The principal of each Priority School shall establish a school environment that improves school safety and discipline and addresses other non-academic factors that impact student achievement, such as students' social, emotional, and health needs. All Priority Schools will be encouraged to implement Positive Behavior Interventions and Supports models along with Response to Intervention models to assist with achieving this type of school environment.
- The principal of each Priority School shall facilitate family and community engagement by partnering with the SEA and the EMO or appointed leadership to conduct an audit of the current level of family and community engagement and using tools such as the Family Engagement Tool provided by the Center for Innovation and Improvement to establish policies and routines that will encourage ongoing family and community partnerships with the school.
- The State Board of Education will accept nominations of parents and community members to serve on an Advisory Board to the State Board of Education and the EMO or C3S leadership.

WISE: All Priority Schools will be required to use the Ways to Improve School Effectiveness (WISE) Online Planning Tool based on the State's Nine Essential Elements and 90 Performance Indicators (described in detail in Section 2.G). For Priority Schools in the C3S, the C3S leadership will assist principals in determining the focus of the school's improvement plan created through WISE. For non-traditional schools, such as virtual schools, alternative schools, or schools that serve students in court-ordered placements, the SEA will work with the school to select or modify sections of the WISE Tool most appropriate for those settings. All Priority Schools will be required to attend SEA-, LEA-, and C3S leadership-provided professional development targeted to the intervention strategies implemented in the school and based on the school's improvement plan created through WISE. No teacher or administrator in a Priority School will be exempt from participation in required training or professional development, regardless of the time of day, week, or year, except in circumstances protected by federal or state law; however, the SEA and the C3S leadership will conscientiously protect instructional time for classroom teachers.

21st Century Community Learning Centers (21st CCLC): A Priority School that is currently receiving or is awarded a 21st CCLC grant may submit an amendment to their original grant application to use a limited percentage of their 21st CCLC funds for extended learning time in accordance with the guidance provided by the SEA and based on a comprehensive needs assessment. This amendment must be approved by the SEA. The extended learning time must include the following:

- **School Community Partnerships:** To ensure that expanded learning programs are high quality, creative, and maximize the potential of each local community, strong partnerships that emphasize collaboration, data and resource sharing, communication, and alignment between schools and community-based/faith-based organizations should be at the core of expanded learning time programs. Meaningful, active collaboration at all levels increase the likelihood of success.
- **Engaged Learning:** Expanded learning programs should be used to enhance and complement—but not replicate—learning that takes place during the traditional school day. Quality expanded learning opportunities provide children and youth with hands on, student-centered learning that motivates and inspires them. These meaningful experiences, involving science, math, physical activity, music, arts and opportunities for service, complement but do not replicate the traditional school day and take place in an environment that is less stressful than the traditional school day. Expanded learning programs should provide opportunities for mentoring, tutoring, internships, apprenticeships, individualized learning, college and career exploration, and even jobs.
- **Family Engagement:** Expanded learning programs should maintain parental choice, community involvement, and family engagement. Quality programs succeed because parents and children choose to fully participate. This forces programs to ensure that the learning is meaningful, engaging, and relevant, particularly for older children and youth. Expanded learning time programs can make it easier for working parents to interact with instructors. A wide body of research points to active parent involvement in their children's education as a factor in student success, and community-based organizations partnering with schools on expanded learning time can help facilitate that involvement. Expanded learning programs should focus on meeting the needs of the most at-risk students to ensure that resources are appropriately directed to students most in need of additional supports. For these reasons, expanded learning programs should emphasize parental engagement and parental choice.
- **Prepared staff:** Forming healthy relationships with program staff can lead to a positive emotional climate for students, allowing them to feel comfortable learning and exploring. Factors that serve as a catalyst for establishing these bonds are a small staff-child ratio and a well-prepared and compensated staff. Professional development in both content areas and youth development contribute to staff becoming role models and informal mentors for participating young people.
- **Intentional programming:** The best programs are structured with explicit goals and activities designed with these goals in mind. For instance, program goals might address improving a specific set of social skills, building on previous knowledge, meeting age-specific developmental needs or maximizing engagement in school. Intentional alignment with traditional school-day instruction

allows struggling students to catch up to their classmates, while helping all students hone the skills necessary for success in school.

- **Student participation and access:** In order for youth to take advantage of all that expanded learning opportunities offer, there must be steady access to programs over a significant period of time. Programs that contain components of quality – specifically safety, youth engagement, and supportive relationships – are more likely to keep children in school.
- **Ongoing assessment and improvement:** Programs that employ management practices focused on continuous improvement have the most success in establishing and maintaining quality services. Frequent assessment, both informal and formal, and regular evaluation, both internal and external, are ingredients needed to refine and sustain expanded learning programs.

State Board of Education Oversight: If at any point the State Board of Education determines that a Priority School cannot make improvement or should not be allowed to continue serving students, the LEA may voluntarily surrender the school to the C3S for a period of three years, or the State Board of Education may choose to close the school and reassign students, without prior notice, to higher performing schools in the following:

- LEA,
- Another LEA that does not operate any Priority or Focus Schools, or
- C3S.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

For those LEAs that maintain control of their Priority Schools, Turnaround Principles must be implemented during the 2012-2013 school year. Because the SEA will obtain control of all other Priority Schools beginning July 1, 2012, and begin implementing the Turnaround Principles immediately, the turnaround principles will be implemented in all Priority Schools during the 2012-2013 school year. While all LEAs will continue to operate Priority Schools for the 2011-2012 school year, LEAs must cooperate with the SEA, State Board of Education, and C3S Leadership throughout the 2011-2012 school year to ensure seamless transition and necessary planning and implementation strategies prior to July 1, 2012. If the State Board of Education determines that the LEA is providing a barrier to the implementation of C3S and Turnaround Principles, the State Board of Education may obtain control of the school identified as a Priority School immediately. The plan shown below outlines the steps that will be taken before July 2012.

Key Milestone or Activity	Detailed Timeline	Party or Parties Responsible	Resources (*e.g.*, staff time, additional funding)	Significant Obstacles
Clarify state law to include state control of "Priority Schools" in addition to the current reasons for which the state may obtain control of a school	February – May 2012	State Superintendent Legislative Liaison	Staff Time	Currently, the State law references State Board of Education takeover of a school in relation to School Improvement Status. The State law will need to be amended to use the term "Priority School Status" instead of "School Improvement Status."
Determine funding amounts for each Priority School	No later than June 1, 2012	Assistant State Superintendent, Office of Federal Programs Comptroller	Staff Time	Calculating Title I district allocations for federal FY12 (state FY13) including funds to be reserved at the SEA to serve the C3S.
Allow LEAs to submit documentation of their capacity to implement Turnaround Principles in Priority Schools	February 2012	Executive Director of School Support/School Improvement	Staff Time	None
Contract with an EMO or appoint C3S leadership	No later than March 1, 2012	State Superintendent of Public Instruction General Counsel	Staff Time	Reserved funds will be used to pay for the services of the EMO.
Evaluate principals in C3S Priority Schools	No later than April 1, 2012	EMO or C3S Leadership Executive Director of Teacher and Leader Effectiveness	Staff Time	TLE Commission work may not be complete, so judgments may be made on existing criteria and C3S Leadership expertise.

Determine which principals and teachers will be allowed to continue working in C3S Priority Schools and hire replacements as necessary	No later than June 1, 2012	EMO or C3S Leadership Executive Director of Teacher and Leader Effectiveness	Staff Time	TLE Commission work may not be complete, so judgments may be made on existing criteria and C3S Leadership expertise. State law will need to be reviewed and may be amended to allow for replacement of teachers in Priority Schools without rights to appeal termination.
Begin implementation of Turnaround Principles in all Priority Schools (operated by C3S and LEAs)	August 1, 2012	State Superintendent State Board of Education LEAs	Staff Time	None

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

In order to exit Priority School status, a school must earn an A, B, or C on the State's A-F School Grading System.

If a school exits Priority Status prior to implementation of Turnaround Principles, the LEA may maintain control of the school and will not have to implement Turnaround Principles.

If a school exits Priority Status after beginning implementation of the Turnaround Principles, the school must continue implementation of the Turnaround Principles until the Turnaround Principles have been in place for at least three years.

If the Priority School is a member of C3S at the time that the school exits Priority Status, control of the school may be returned to the LEA if all of the following criteria are met:

- The LEA can demonstrate capacity to support the school in continuous improvement efforts to ensure that the school does not worsen after leaving the C3S.
- The State Board of Education agrees to relinquish control of the school to the LEA, believing that the LEA is the best suited entity to run the school.
- The LEA has demonstrated improvement in other schools across the LEA during the three-year or longer period in which the school was operated by the C3S.
- The parents of students in the school agree by majority vote to return the school to control of the LEA.

If all of these conditions are not met, the State Board of Education may choose to keep control of the school as part of the C3S, or the State Board of Education may reassign control of the school to the original LEA, another LEA, or a Charter School Operator.



Key Take Away for Section 2.D: Failure is no longer an option in Oklahoma schools. In order to preserve and protect the futures of all Oklahoma children, Turnaround Principles and drastic improvement will be required of the State's lowest performing schools.

2.E FOCUS SCHOOLS

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

At the time of submission of this ESEA Flexibility Request, the State's newly adopted A-F School Grading System has not been implemented. Implementation will begin in the 2012-2013 school year; therefore, initial identification of Focus Schools will be based on the methodology described below. Identification of Focus Schools in future years will be based on the A-F School Grading System as explained at the end of this section.

Initial Year (In 2011): In order to identify schools that are contributing to the achievement gap (i.e., Focus Schools), the State will include scores on the most recent administrations as well as prior administrations of the state assessments in reading and mathematics used in the prior accountability system. These include assessments of Grades 3-8 reading and mathematics, and at the high school level, Algebra I and English II for the "all students" group, which includes students with disabilities and English Learners, administered during the 2010-2011 school year.

The SEA chose not to include science, social studies, and writing in the initial identification of Focus Schools based on feedback from LEAs that it would be unfair to identify schools and require drastic interventions based on 2010-2011 assessment data in subjects that were not used in the Accountability System that was in place for the 2010-2011 school year. (See the end of this section for how this identification will differ beginning in 2012-2013.)

In 2010-2011, the State had 1208 Title I schools; therefore, the State will identify at least 121 schools (10%) as Focus Schools. In addition, Oklahoma will identify non-Title I schools with student achievement that is comparable to the Title I schools identified.

Five methods for identifying Focus Schools were defined in the *ESEA Flexibility*. Oklahoma has chosen to use three of these five methods. The first two options based on within-school achievement gaps were not chosen because of the inability of within-school gaps based on small population sizes to "move the needle" on statewide achievement gaps; therefore, Oklahoma used Methods 3, 4, and 5 of the *ESEA Flexibility* definition for Focus Schools.

Method 3 (See Table 2, Key G): The lowest achieving three subgroups in the State will be identified by averaging each subgroup's reading API score and mathematics API score for the 2010-2011 school year. For each of the three subgroups, any school that has a population of students in that subgroup that is more than the State's population percentage will be considered based on the criteria listed below. (For example, if the State identifies the Black student subgroup as one of the three lowest performing subgroups in the State, any school with a population greater than 11% Black students would be considered because the State's enrollment of Black students is 11% of the population.)

- For each school, the proficiency index scores for each subgroup under consideration will be averaged. The content areas included for 2010-11 are Grades 3-8 reading and mathematics, Algebra I, and English II. All students in each subgroups scoring advanced will receive 4 points, all students scoring proficient will receive 3 points, all students scoring limited knowledge will receive 2 points, and all students scoring unsatisfactory will receive 1 point. For each subgroup at each school, the total number of points received will be divided by the number of these assessments given in that year in that school.
- Schools will be rank ordered by grade span (elementary, middle/junior high, and high school) within each subgroup.

Any Title I school in the bottom 30% of the Title I schools within each grade span (elementary, middle/junior high, and high school) as well as any school in the bottom 30% of all schools (Title I and

non-Title I) for each grade span for any of the three subgroups will be named as a Focus School unless the school has been named as a Priority School or unless the school has been named as a high-progress Reward School, which would indicate that the school has *not* demonstrated a lack of progress on those assessments over a number of years in the "all students" group. The percent of schools identified was chosen in order to obtain at least 121 Title I Focus Schools and additional non-Title I Focus Schools.

Method 4 (See Table 2, Key G): The two subgroups with the lowest graduation rates in the State will be identified for the 2009-2010 school year. For each of these subgroups, any school that has a population of students in that subgroup that is more than the State's population percentage will be considered based on the criteria listed below. (For example, if the State identifies the Black student subgroup as one of the two subgroups in the State with the lowest graduation rates, any school with a population greater than 11% Black students would be considered because the State's enrollment of Black students is 11% of the population.)

- For each school, the graduation rate for the subgroup under consideration will be averaged for the 2007-2008, 2008-2009, and 2009-2010 school years.
- Schools will be rank ordered within each subgroup.

Any Title I school that is in the bottom 10% of Title I schools as well as any Title I or non-Title I school that is in the bottom 10% of all schools for either of the subgroups will be named as a Focus School unless the school has been named as a Priority School or unless the school has decreased by half the difference between the subgroup's graduation rate and 100% since the 2007-2008 school year. (For example, if a school had a graduation rate of 40% in 2007-2008 for the subgroup under consideration, but the school had a graduation rate of 70% or higher for the subgroup in the 2009-2010 school year, the school would not be named as a Focus School because the school decreased by half the difference between 40% and 100% for that subgroup.)

Method 5 (See Table 2, Key H): Since the total number of high schools in the State with a graduation rate below 60% for three consecutive years (2007-2008, 2008-2009, and 2009-2010) did not exceed 25% of the Priority School identification, no additional schools were identified as Focus Schools.

Subsequent Years (Beginning in 2012): Any Title I or non-Title I school that is identified as a D+, D, or D- school based on the State's A-F School Grading System as defined by Oklahoma Statute Title 70 Section 1210.545 and subsequent Oklahoma Administrative Code will be identified as a Focus School. This identification will include student achievement on all state assessments as well as other school and student achievement factors related to college, career, and citizen readiness (C^3).

2.E.ii Provide the SEA's list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Focus School identification is based on achievement of subgroups and closing gaps between subgroups. Implementing strong interventions in Focus Schools aligns perfectly with the State's goals of closing all achievement gaps and seeing each student graduate from high school ready for college, careers, and citizenship (C^3) by the year 2020: C^3 by 2020.

Because Focus Schools will have vastly different intervention needs based on the subgroups that are underperforming or graduating at lower rates, it is imperative that Focus School interventions be designed

to target the specific needs of the school, its educators, and its students.

The SEA will work in close collaboration with each LEA in which a Focus School is identified to determine a plan for meeting the needs of that school. All Focus Schools will be required to use the WISE Online Planning Tool based on the State's Nine Essential Elements and 90 Performance Indicators (described in detail in Section 2.G). SEA leadership, SEA staff, or a representative on behalf of the SEA will assist the LEA and site principal with determining the focus of the school's improvement plan created through WISE. For non-traditional schools, such as virtual schools, alternative schools, or schools that serve students in court-ordered placements, the SEA will work with the school to select or modify sections of the WISE Tool most appropriate for those settings. All Focus Schools will be required to attend SEA-provided professional development targeted to the intervention strategies implemented in the school and based on the school's improvement plan created through WISE. No teacher or administrator in a Focus School will be exempt from participation in required training or professional development, regardless of the time of day, week, or year; however, the SEA will conscientiously protect instructional time for classroom teachers.

The principal of each Focus School, along with a team of teacher leaders, will be required to participate in state-provided training in the Oklahoma Data Review Model. The principal of each Focus School and all teachers within each Focus School will be required to participate in regular reviews of data to inform instruction and for continuous improvement, particularly in the subgroup(s) for which the school was identified. This will require providing time for collaboration on the use of data.

Each LEA with at least one Focus School will be required to set aside a percentage, not to exceed 20%, of its Title I, Part A allocation to implement appropriate and rigorous interventions in the Focus Schools and to provide school choice options for parents/guardians of students in the school. This percentage will be determined on a sliding scale and will take the following into consideration:

- the number of schools in the LEA that are identified as Priority Schools,
- the number of schools in the LEA that are identified as Reward Schools,
- the number of schools in the LEA that did not make AMOs or otherwise are in need of intervention as defined by the State's Differentiated Recognition, Accountability, and Support System, and
- the percentage of the student population that is performing below grade level or at risk of not graduating.

At least 5% of the LEA's Title I, Part A allocation must be available to provide school choice options to parents/guardians of students in the school. These funds will provide transportation from the Focus School to higher-performing schools that are able to accept additional students.

The remainder of the LEA's Title I, Part A set-aside as described above must be spent on interventions and strategies consistent with the research-based *Menu of Interventions and Supports for School Improvement* (see Attachment 12). Selection of interventions that will be paid for with Title I, Part A funds must be done in consultation with SEA leadership, SEA staff, or a representative on behalf of the SEA and must align with the school's improvement plan developed through WISE.

Title I or Title I-eligible Focus Schools that are not operating Title I Schoolwide Programs may begin operating Schoolwide Programs if the LEA is implementing interventions consistent with the Turnaround Principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in the school, as appropriate. The Office of Federal Programs at the SEA will establish procedures for this transition. LEAs with Title I-eligible Priority Schools that are not being served with Title I funds are strongly encouraged to begin serving these schools with Title I funds in order to meet the academic needs of these students. In addition, if a Focus School chooses to

implement one of the four intervention models approved under the School Improvement Grant (SIG), the LEA may apply to use SIG funds to implement those models, if additional funding exists.

All LEAs with Focus Schools will be required to demonstrate capacity to implement appropriate interventions and provide assurances that interventions likely to produce significant student achievement will be implemented in the 2012-2013 school year with additional interventions implemented in subsequent years, as needed.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

In order to exit Focus School status, a school must do the following:

- Make AMOs in all student groups based on the State's new Differentiated Accountability, Recognition, and Support System; and
- Earn an A, B, or C on the State's A-F School Grading System.

At the time that the school exits Focus Status, the school may amend its site improvement plan for the following school years.



Key Take Away for Section 2.E: Closing achievement gaps and raising student performance or graduation rate of particular subgroups will require targeted interventions specific to the needs of each subgroup. Significant commitments of financial resources and professional development will be needed to close these gaps.

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE 1 SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

The State's newly adopted A-F School Grading System will provide incentives and supports to ensure continuous improvement in all Title I and non-Title I schools. The following table summarizes the differentiated interventions and incentives for Title I schools:

	Grade +	**Grade**	**Grade –**
A	*Reward School*	*Reward School*	LEA-identified Interventions
B	LEA-identified Interventions	LEA-identified Interventions	LEA-identified Interventions
C	Required Interventions	Required Interventions	Required Interventions
D	*Focus School*	*Focus School*	*Focus School*
F		*Priority School*	

The rewards and recognitions described in section 2.C for Reward Schools provide incentives for all schools to work toward continuous improvement in order to receive this designation.

The research-based interventions described in section 2.D for Priority Schools and section 2.E for Focus Schools are the strategies proven to have the greatest likelihood of resulting in continuous improvement for these schools.

In addition, the LEA-identified Interventions and research-based Required Interventions for schools receiving a School Grade of A-, B+, B, B-, C+, C, or C- (described below) along with the SEA-provided supports described in section 2.G will provide the support that all Title I and non-Title I schools will need to continuously improve student achievement and close achievement gaps.

School Improvement Plans

Oklahoma state law requires all schools to have a school improvement plan that is updated annually as part of the LEA's Comprehensive Local Education Plan. Schools that are awarded a School Grade of B or above would include in their school improvement plan those LEA- and school-identified interventions that would lead to continuous school improvement. These interventions may be chosen from the research-based *Menu of Interventions and Supports for School Improvement* (see Attachment 12).

Some of these interventions may be provided by the State for any interested school. For example, some of the strategies offered by the SEA as described in section 2.G might be interventions that a school would voluntarily choose to implement.

Required Interventions

Innovating beyond the *ESEA Flexibility* requirements, Oklahoma will require interventions of all schools that are in the bottom 25% of the State in student achievement that have not been previously identified as Priority

Schools or Focus Schools. These schools will be identified as Targeted Intervention Schools **(See Table 2, Key I)** and must implement interventions and strategies consistent with the research-based *Menu of Interventions and Supports for School Improvement* (see Attachment 12). In addition, the State Board of Education may choose to review and approve the total operating budgets of all LEAs within which a Targeted Intervention School exists to ensure that appropriate funds are being spent on improvements in the Targeted Intervention School.

Further, schools that receive a School Grade of C+, C, or C- will be required to implement interventions and strategies consistent with the research-based *Menu of Interventions and Supports for School Improvement* (see Attachment 12).

LEAs with Title I schools that are Targeted Intervention Schools or schools that are required to implement interventions because of a School Grade of C+, C, or C- must provide assurances that a sufficient amount of Title I, Part A funding is used at that school site to implement interventions that are likely to produce significant student achievement. The LEA may choose to set aside a percentage of the LEA's Title I, Part A allocation, not to exceed 10%, to serve these schools directly, or the LEA may choose to spend site allocations on these targeted interventions. When LEAs are making this decision, they should take into consideration the number of schools in the LEA that are identified as Priority Schools and Focus Schools as well as the number of schools in the LEA required to implement interventions because they are Targeted Intervention Schools or because of a School Grade of C+, C, or C-.

Targeted Intervention Schools and schools that are required to implement interventions because of a School Grade of C+, C, or C- must include in their school improvement plan the professional development and other required interventions that will be implemented in the school that are likely to improve student achievement. These schools are encouraged to use the WISE Online Planning Tool, Oklahoma's Nine Essential Elements, and 90 Performance Indicators to create their plan, but they are not required to do so. For non-traditional schools, such as virtual schools, alternative schools, or schools that serve students in court-ordered placements, the SEA will work with the school to select or modify sections of the WISE Tool most appropriate for those settings. These schools are highly encouraged to include in their plan data analysis processes consistent with the Oklahoma Data Review Model and state-provided professional development that targets the specific needs of the school, its educators, and its students.

State Supports

In addition to the research-based *Menu of Interventions and Supports for School Improvement* (see Attachment 12), the State provides supports for capacity building in all schools as described in 2.G.



Key Take Away for Section 2.F: Oklahoma's Differentiated Recognition, Accountability, and Support System provides a comprehensive framework for all schools to show continuous improvement regardless of the school's current level of student achievement, graduation rate, or school success components.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

The SEA builds capacity to improve student learning in the SEA as well as in each LEA and school through a variety of processes and structures.

i. The SEA's School Support/School Improvement Team and other SEA staff will provide timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in Priority Schools and Focus Schools.

Monitoring of LEAs/Schools

WISE: Priority Schools and Focus Schools will submit their school improvement plans through the WISE Online Planning Tool as referenced in Sections 2.D and 2.E. SEA staff will review the plans and will conduct periodic review, monitoring, and provide timely feedback of implementation of the plan. School Support Teams will assist in this process.

Monitoring Structure: Priority schools will be required to implement one of four United States Department of Education's SIG models, or implement an intervention that satisfies the Turnaround Principles. Monitoring of Priority and Focus schools will be conducted by the SEA's School Support/School Improvement Team in collaboration with the Office of Federal Programs, the Office of Student Support, the Office of Instruction, the Office of Special Education, and the Office of Accountability and Assessment.

Monitoring of the schools will be a key focus of the SEA to ensure implementation of requirements, addressing programmatic and fiscal accountability in the use of federal funds and the manner in which schools have supported and leveraged funds that LEAs were previously required to reserve under ESEA section 1116(b)(10). Monitoring will include the use of School Improvement Grant funds as well as any other federal funds that are permitted for use according to *ESEA Flexibility* guidance. Expenditures will be thoroughly reviewed for accountability and transparency to ensure alignment to program goals and reform initiatives. Student achievement results will be evaluated in order to determine effectiveness of implementation.

Monitoring of Interventions in Priority Schools and Focus Schools

Currently, SIG schools submit School Improvement Status Reports (SISRs) quarterly. Priority Schools will also be required to complete a quarterly status report. The purpose of the status reports is for LEAs or leadership from the group of schools known as C^3 Schools (C3S) to report to the SEA the progress schools have made toward meeting goals. Status reports will include school-level data such as benchmark assessments in reading, mathematics, and other content areas as requested; teacher and student attendance data; discipline and suspension data; graduation/dropout rate data; and progress made toward implementation of the selected intervention model.

Focus schools will be required to complete a semi-annual status report. The purpose of the status reports is for LEAs to report to the SEA in the following areas: the progress made by schools toward meeting district goals; the progress demonstrated at the school level such as district benchmark assessments in reading, mathematics, and other content areas as requested; student attendance data, discipline and suspension data; and graduation/dropout rate data.

In addition, School Support Teams, comprised of current practitioners and led by contracted employees of the SEA, will make regular visits to Priority Schools and Focus Schools to check for implementation of interventions and to offer ongoing support of these schools, their teachers, and their leadership.

ii. The SEA's Office of Accountability and Assessment (including the Regional Accreditation Officers), Office of Student Support (including the School Support/School Improvement Team), the Office of Federal Programs, the Office of Instruction, the Office of Special Education, and the Priority Schools Advisory Board will hold LEAs and schools accountable for improvement of student and school achievement, particularly for turning around Priority Schools.

A-F School Grading System: The Office of Accountability and Assessment will implement the A-F School Grading System. The system is designed to hold LEAs and schools accountable for continuous improvement by incorporating student growth as a component of the A-F School Grading System.

Federal Programs and School Support/School Improvement Monitoring: The Office of Federal Programs in conjunction with the School Support/School Improvement will hold LEAs accountable for improving schools and student performance and particularly for turning around the Priority Schools. A monitoring tool and timeline for the LEAs with Priority Schools will be developed by the SEA to ensure model implementation, improved student achievement, and effective use of program funds.

Priority Schools Advisory Board: Other efforts supporting school and student accountability will include the development of a Priority Schools Advisory Board. The board members will consist of SEA personnel, practicing educators, School Support Team leaders, members from the Committee of Practitioners, community stakeholders, and higher education representatives. This board will continue throughout the *ESEA Flexibility* waiver timeframe. The board members, or executive committee of the board, will review LEA capacity for supporting implementation of the Turnaround Principles. The board will also annually review all relevant documentation from the C3S Leadership and Priority School LEAs for the purpose of determining progress being made toward established goals and the fidelity with which the Turnaround Principles are being implemented. The Advisory Board will make recommendations to the SEA and State Board of Education for the continuation of Priority School status.

Regional Accreditation Officers: The Regional Accreditation Officers (RAOs) will hold LEAs and schools accountable for improvement of student and school achievement by assigning the 13 RAOs to perform timely, consistent reviews addressing the components included in this *ESEA Flexibility Request* and how they align with state-mandated requirements.

iii. The SEA has been restructured to ensure sufficient support for implementation of interventions in Priority Schools, Focus Schools, Targeted Intervention Schools, and other Title I schools identified under the SEA's Differentiated Recognition, Accountability, and Support System.

The structure of the SEA was designed to place focus on the State's goal that all students will graduate college, career, and citizen ready. With the focus of the SEA on this ultimate goal, all efforts of the State will coalesce around implementing interventions in schools where students are not achieving this goal.

Additionally, LEAs will be supported in the use of federal, state, and local funds that are focused on implementation of these interventions. The SEA will remove all possible obstacles that currently limit the capacity of LEAs and schools to use available funds to meet the direct needs of schools, educators, and students.

Capacity-Building Initiatives for SEA, LEAs, Schools, Leaders, and Teachers

Initiatives that will Increase Capacity of the SEA

The SEA has chosen to participate in multi-state consortia and collaborative associations in order to develop its own capacity to serve LEAs and schools. The SEA will continue to participate in these multi-state organizations and to seek out additional support from other states implementing similar reform strategies. Additionally, the SEA uses internal strategies to increase the capacity of its leadership and staff. The following are examples of capacity-building initiatives implemented for the SEA.

Chiefs for Change: Oklahoma is honored to be a part of the reform-minded Chiefs for Change organization. Superintendent Barresi joins other state education leaders who share a common approach toward improving the nation's education system. Chiefs for Change has already provided USDE with a Statement of Principles for Reauthorization of the Elementary and Secondary Education Act. Oklahoma looked to this document as a guide to inform development of this *ESEA Flexibility Request*. In keeping with the direction of this document, Oklahoma looks forward to the Congressional reauthorization of ESEA and offers this plan as a blueprint for consideration. As a member of Chiefs for Change, Superintendent Barresi and SEA staff have participated in several activities that have enhanced the capacity of the SEA. These include the attendance of the SEA's Academic Leadership Team at the annual Excellence in Action Summit in October 2011, regular informational conference calls, and cross-pollination of best practices and innovations for solutions to common challenges. (http://www.excelined.org/Pages/Excellence_in_Action/Chiefs_for_Change.aspx)

Implementing Common Core Systems (ICCS): Oklahoma is a member state in the Council of Chief State School Officers (CCSSO) collaborative to work within state teams, across states, and with national experts to discuss and share concrete resources and strategies to meet the challenges and leverage the opportunities presented by Implementing the Common Core State Standards (ICCS). The ICCS collaborative meets three times annually, with frequent interaction between meetings. Oklahoma's team members include Assistant State Superintendent, Office of Instruction; Assistant State Superintendent, Office of Student Support; Vice Chancellor, Oklahoma State Regents for Higher Education; and Principal, Tulsa Public Schools. Two team positions are currently open. Training from meetings in January 2011

and April 2011 provided the SEA's ICCS team with a deeper understanding of the systems change process as related to CCSS. Using the systems change model, team members provided the SEA's new administration leadership staff with a full day of training on implementing CCSS, and used this training to create more abbreviated presentations to specific and targeted audiences. At the August 2011 ICSS collaborative meeting, the SEA's team members designed the 3-year framework of professional development for the REAC^{3}H Network, including key focuses for future REAC^{3}H Leader Summits and an overview of topics for implementation toolkits. At the meeting, the CCSSO team provided sessions on using the ICCS online resources to help with state implementation and cross-state sharing, as well as with communicating the CCSS message. Oklahoma's team has used these tools to advantage. The collaborative provides an ICSS coach to support the State's efforts by serving as a "critical friend." Monthly conversations help the SEA review progress on meeting CCSS implementation goals.

PARCC: Oklahoma is a governing member of the Partnership for Assessment of Readiness for College and Careers (PARCC). The purpose of PARCC is to create an innovative and in-depth assessment of the CCSS. The Oklahoma staff work collaboratively with other PARCC member state leaders to design this next-generation assessment system. Once the new system is operational in 2014-15, Oklahoma educators will benefit from the information provided that will demonstrate how well students are prepared for college and career readiness curriculum found in the CCSS. As a member of this collaborative, Oklahoma SEA staff as well as selected LEA leaders, legislators, and other stakeholders have the opportunity to participate in capacity-building institutes that focus on planning for implementation, developing a coalition of support, disseminating resources, and providing feedback to the PARCC leadership.

Academy of Pacesetting States: The Academy of Pacesetting States, established through the Center on Innovation and Improvement (CII), included Alaska, Arkansas, Idaho, Illinois, Louisiana, Michigan, Montana, Oklahoma, and Virginia. The purpose of the Academy was to create a learning community for state teams from states intent upon leading the way to rapid improvement of districts and schools. The Center provided training, consultation, and support to enable the participating states to develop a high quality, comprehensive statewide system of support. The Oklahoma team collaborated with all SEA divisions during this process to build SEA capacity in order to better serve our districts and schools.

State Longitudinal Data System: In partnership with the P-20 Data Coordinating Council, the Oklahoma Partnership for School Readiness, and the Information Services Division of the Office of State Finance, the SEA has begun development of a P-20 state longitudinal data system capable of providing data and information related to improving teacher preparation, professional development, and classroom instruction. This system will provide critical support to SEA reforms including TLE, A-F School Grading System, Third Grade Reading Success, CCSS Implementation, and the new PARCC assessments.

Professional Learning Community Teams: The SEA will implement The Professional Learning Community (PLC) Team Concept in support of CCSS throughout the various divisions of the agency. The teams are defined as a community of SEA professionals committed to working collaboratively in ongoing processes of collective inquiry and action research to achieve better results for improved student achievement and teacher/leader effectiveness throughout the State. The PLC Teams will operate under the assumption that the key to improved student achievement and teacher/leader effectiveness should be continuous and job-embedded learning for all stakeholders.

Lunch and Learn: The SEA will increase opportunities for leadership and staff to participate in bi-weekly Lunch and Learn workshops. Lunch and Learn workshops are offered by SEA staff, sometimes in collaboration with LEA leaders, for other SEA staff. These workshops encourage cross-division collaboration and breaking down of silos as SEA staff members have the opportunity to learn about activities, initiatives, requirements, and best practices used throughout the SEA and the State.

Initiatives that will Increase the Capacity of LEAs, Schools, Leaders, and Teachers

Oklahoma's Statewide System of Support (SSOS) is designed to offer assistance and increase the capacity of LEAs, schools, leaders, and teachers using a model of differentiation. This model, shown in the figure below, offers universal access to Standard Support for Schools, differentiated access to Focused Support for Schools, and intervention and highly-selective Intensive Support for Schools.



- *Standard Support for Schools (All Title I and Non-Title I Schools)* is designed to assist educators providing access to challenging curriculum that will lead to college, career, and citizen readiness for all students. Professional development and technical assistance is offered in all aspects of continuous school improvement, including leadership, culture development, curriculum, assessment, special education, and ELL instructional strategies.

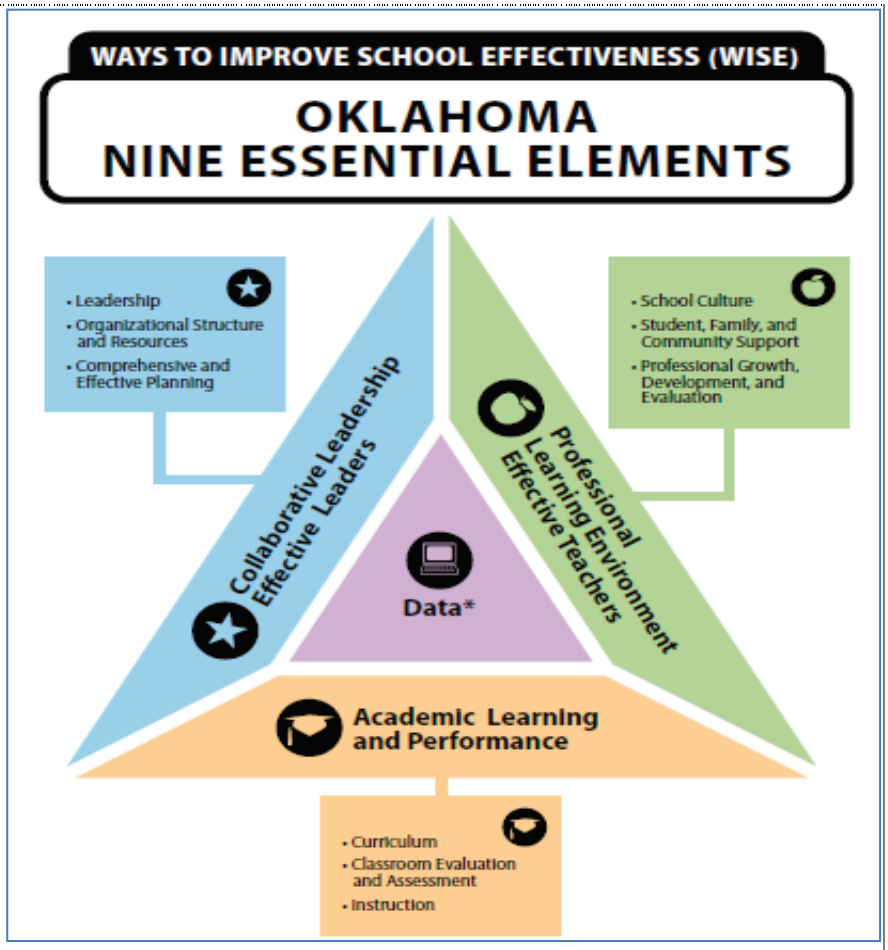
- *Focused Support for Schools (Focus Schools, B-, C+, C, and C- Schools)* includes standard and differentiated support as identified by specific needs of students. For example, if a school had an ELL subgroup that did not meet the reading performance benchmark, the school may need to hire ELL coaches or participate in SEA-provided professional development in Sheltered Instruction Observation Protocol and literacy strategies.

- *Intensive Support for Schools (Priority Schools and SIG Schools):* In addition to the standard and differentiated support designed to reflect the needs of the school, intensive and comprehensive professional development and technical assistance is provided. This includes on-site training, summer academies for all staff and administrators, ongoing educational leadership coaching, and other interventions and supports aligned with turnaround principles.

Standard Support for Schools

Oklahoma Nine Essential Elements Performance Indicators, Rubrics, and Strategies to Implement: The Oklahoma Nine Essential Elements is a comprehensive framework that guides districts and schools in making strategic decisions in the areas of (a) academic learning and performance, (b) professional learning environment, and (c) collaborative leadership. The nine elements are (1) curriculum; (2) classroom evaluation and assessment; (3) instruction; (4) school culture; (5) student, family, and

community support; (6) professional growth, development, and evaluation; (7) leadership; (8) organizational structure and resources; and (9) comprehensive and effective planning.



The Oklahoma Nine Essential Elements are subdivided into 90 Performance Indicators of effective practice that represent all aspects of school operations (See Attachment 13). For those schools utilizing the WISE Online Planning Tool (detailed below), the Elements are embedded in and aligned with the school improvement plan. Priority and Focus Schools would be required to utilize WISE and Oklahoma's Nine Essential Elements Performance Indicators and Rubrics to develop a comprehensive plan to improve teaching and learning.

Ways to Improve School Effectiveness (WISE) Online Planning Tool: Oklahoma's WISE Tool, developed by the Center on Innovation and Improvement, is an online planning tool for schools and is based on the Oklahoma Nine Essential Elements. WISE allows districts and schools to meet federal Title I requirements and LEA requirements. The WISE Tool is designed to help district and school staff identify which of the Nine Essential Elements performance indicators to assess, plan, and monitor.

Features of the WISE Tool include self-assessing district and school indicators; utilizing the 29 rapid improvement indicators; creating a school plan that meets federal Title I regulations; accessing WISE Ways™ to obtain research-based strategies for each Essential Element; receiving coaching comments; and monitoring progress toward full implementation of the plan.

The State Superintendent's Master Teachers Project (MTP): MTP is dedicated to increasing the number of highly effective teachers in each region of the State by developing their knowledge of specific content and instructional strategies that support rigorous learning standards and performance-based assessments of the CCSS. The project grows teacher leaders in a number of ways:

- Members attend an intensive 3-day summer institute where they receive training in research-based instructional strategies and facilitation of professional development sessions. Training

is provided by nationally-known presenters and the SEA's Curriculum Team.

- Members conduct professional learning groups in their districts to deepen the content and pedagogical knowledge of instructional teams as they research and discuss best practice and lessons learned, through collaboration. Instructional teams receive this job-embedded professional development on a voluntary basis and share their conclusions with their colleagues regularly.
- Members receive content-specific literature and teaching materials to add to their professional libraries.
- Graduates of the two-year project are eligible to apply for membership in the Master Teachers Leadership Project. Members design, implement, and collect efficacy data on school improvement projects in their home districts.

MTP members in each of the six regions serve as conference organizers and presenters at summer regional curriculum conferences sponsored by the SEA, developing their skills as teacher leaders in the process. Additional presenters are selected by the conference committees from proposals submitted to the SEA online. The Oklahoma *PASS*ages Regional Curriculum Conferences provide opportunities for highly effective teachers to share their content knowledge and best practices. One-day conferences "for teachers, by teachers" offer sessions in mathematics, science, reading and language arts, social studies, fine arts, and world languages. Other sessions provide training in classroom management techniques, differentiating curriculum, working with generational poverty, incorporating strategies for ELLs, and co-teaching techniques for mainstreamed students with special needs. All sessions must demonstrate a connection to raising students' measurable achievement. Nationally-known keynote speakers focus on topics of interest to all educators. In 2011, keynoters addressed CCSS, supported by CCSS breakout sessions throughout the day.

The mission of the regional conferences is to spotlight excellent teaching and learning in every part of Oklahoma and to create regional networks of professional and community support. Through the work of local teacher leaders, partnerships have been formed with chambers of commerce, business sponsors, regional colleges and universities, and CareerTech centers. The regional MTP curriculum conferences can serve to support the goal of the REAC^{3}H Network to implement CCSS, TLE, Third Grade Reading, and other state initiatives.

To date, MTP has trained and supported more than 600 Oklahoma teachers. In 2010, MTP was given a commendation as an effective professional development program by the USDE Title II monitoring team.

Windows on Curriculum (WOC): WOC is designed as a systemic change process. WOC gives school sites and districts a method of providing feedback for reflection on practice as well as a tool for data collection and analysis to guide professional development planning. Participants are trained in collecting data, coaching, and supporting quality classroom instruction. WOC is a collaborative, non-evaluative model that can be implemented by both administrators and teachers. Windows on Curriculum provides the following:

- A brief classroom visit structure and process that focuses on teaching and learning;
- Skills to analyze teaching and learning through frequent, brief classroom visits;
- Effective data-gathering strategies;
- Curriculum analysis skills;
- Means for aligning instruction with state standards and CCSS; and
- Use of techniques and strategies for increasing reflection on classroom practices.

WOC identifies "window frame" indicators that help educators get a clear view of the classroom. Participants learn to analyze these viewings and use the information to design activities that promote

individual, departmental, or school-wide reflection. Participants also are trained to analyze data over time for use in long-range planning. Training is conducted on-site, using actual classrooms, and is targeted to principals and assistant principals, directors of curriculum and instruction, district-level administrators, teacher mentors and instructional coaches, content specialists, and classroom teachers.

State Superintendent's Mathematics Academies: Mathematics Academies provide professional development to mathematics educators that foster improved student achievement on Algebra I EOIs and mathematics portions of the state assessments in all grade levels. Any teacher of mathematics in Grades PK-12 may participate in the professional development opportunity. Each summer more than 400 participants receive instruction in creating hands-on, application-based math lessons for all students. Since Summer 2010, Math Academy sessions have been designed to prepare teachers to implement the increased rigor of the CCSS.

Science Inquiry Institutes: Science Inquiry Institutes provide teachers with the opportunity to experience science inquiry at two levels. Level I participants reflect and incorporate inquiry into classroom instruction. Science inquiry supports CCSS problem-solving, higher order thinking, literacy, and mathematics instructional strategies. Level II participants experience formative assessment through inquiry and reflection activities and incorporate new formative assessment strategies into classroom instruction. Teachers are required to complete daily and end-of-institute reflection journals. Teachers are also required to complete a follow-up assignment through shifting a lesson to inquiry, teaching the lesson, and providing reflection and documentation to the SEA. Teachers in Level II are required to incorporate formative assessment strategies into their classroom and to provide reflection and documentation to the SEA.

Oklahoma *Building Academic Vocabulary (BAV):* BAV is a partnership with Dr. Robert Marzano and educators in Oklahoma. Oklahoma educators have identified key vocabulary for each core content area at each grade level to be used as a teaching resource to increase the number of students who reach the proficient and advanced levels of academic achievement. SEA staff provides professional development in the use of *Building Academic Vocabulary* strategies for teaching vocabulary concept attainment, as designed by Dr. Marzano. A webpage on the SEA website is continuously updated with new activities and links. (http://www.sde.state.ok.us/Curriculum/BAV/default.html)

Oklahoma Advanced Placement Incentives Program/Advancement Via Individual Determination (AVID): Funding for the Oklahoma Advanced Placement Incentives Program consists of the following components: Teacher training to attend College Board AP Conferences, Oklahoma Advanced Placement AP and Pre-AP Conferences, AP Summer Institutes, IB Institutes and Conferences; materials and equipment grants for AP or IB classes and second-time materials and equipment grants after four years of successful implementation of the original AP or IB grant course; AP and IB Vertical Team and Training grants; exam fee subsidies; score incentives to the school sites for each score of 3 or better on an AP exam OR 4 or better on an IB exam. The SEA promotes the growth of AVID programs by building awareness, arranging training, and supporting an AVID page on the SEA website.

Focused Support for Schools

Adolescent Literacy Conferences: Adolescent Literacy Conferences are conducted to support teachers in implementing literacy strategies that maximize student learning in reading, writing, communication, and higher order thinking skills. Priority and Focus schools will continue to have high quality professional development from nationally recognized presenters.

What Works in Oklahoma Schools (WWIOS) Conferences: WWIOS Conferences have been held annually, since 2005, for Oklahoma schools needing improvement. Dr. Robert Marzano has aligned the Oklahoma Nine Essential Elements to the What Works in Schools strategies. Presentations are developed

to support the areas of need for Oklahoma schools and to ensure that scientifically based research and best practices are being presented to the schools. During the institute, Dr. Marzano and associates meet in small groups with the SIG principals to discuss challenges, successes, and best practices in similar schools. Priority and Focus schools will continue to have high quality professional development from Marzano Research & Associates and/or other nationally recognized presenters.

What Works in Oklahoma Schools Study: Oklahoma contracted with the Marzano Research Laboratory (MRL) in the spring of 2010 to conduct a research study based on the Oklahoma Nine Essential Elements Performance Indicators. The study included 33 schools in improvement and 28 schools that were not in improvement, but had similar demographics. The study was designed to (1) validate the Oklahoma Nine Essential Elements Performance Indicators that are integral to the success of Oklahoma schools, (2) provide feedback on strengths and areas of need for a sample of Oklahoma schools, and (3) use the results to create a replicable system for all Oklahoma schools to better identify areas of strength and need.

Phase I consisted of MRL surveying administrators, teachers, parents, and students. During Phase II, researchers interviewed administrators and observed classrooms.

Based on surveys, principal interviews, on-site observations, and videotape analyses conducted during Phases I and II, MRL provided the following five recommendations to help schools move from Improvement status to Non-Improvement status:

- Administrators and teachers should seek agreement on the school's strengths and weaknesses regarding school performance.
- All teachers should set personal goals regarding instructional strategies.
- Student engagement should receive a school-wide focus.
- Students' perceptions of acceptance and order should be examined.
- Schools should find ways for staff to work together (e.g., professional learning communities).

The What Works in Oklahoma Schools Resource Toolkit can be used by Oklahoma district administrators, principals, and teachers to determine the best courses of action for their schools and classrooms. Included in the toolkit are the following:

- Administrator Survey
- Teacher Survey
- Student Survey Grades 3-5
- Student Survey Grades 6-8
- Student Survey Grades 9-12
- Principal Interview Questions
- Planning Questions

The electronic surveys, aligned to the Oklahoma Nine Essential Elements, will be used to conduct a comprehensive needs assessment at the school or district level.

Intensive Support for Schools

School Support Teams (SSTs): SSTs are currently comprised of a retired, highly successful educator (SST Leader); experienced, practicing educators; and an SEA designee. The SST Leaders will visit the Priority Schools multiple times during the school year, but at least quarterly, in addition to the three team visits. Focus Schools will be selected to receive a SST based on specific criteria and evidence of need. Title I schools will receive support according to the SEA's Statewide System of Support assistance model.

SST members will be directly involved in facilitating school improvement processes in identified schools. In collaboration with the SEA, school and district staff, parents, and community members, SST members facilitate an educational needs assessment of each school based on Oklahoma's Nine Essential Elements Performance Indicators and provide guidance for the development and implementation of a comprehensive school improvement plan to build on the school's strengths and address the identified needs.

School Support Teams shall:

- Review development and implementation of the School Improvement plan;
- Utilize Oklahoma's Nine Essential Elements Performance Indicators to examine school and classroom practices in three areas: Academic Learning, Learning Environment and Collaborative Leadership;
- Conduct brief classroom walk-throughs during each SST visit to ensure implementation of the models, including student engagement, implementation of State Standards and CCSS, varied instructional strategies, and a positive learning environment;
- Conduct interviews with administrators, teachers, other school staff, parents, and students to determine if needs of all stakeholders are being met;
- Examine and analyze most recent school benchmark data to ensure the needs of all students are being met;
- Advise schools in scientifically researched based (SBR) strategies that are proven to promote improved practices;
- Create a SST report that assesses the current level of implementation and progress based on the Oklahoma Nine Essential Elements rubrics. The SST will also list strengths and challenges for the school site and make recommendations that are designed to reduce barriers to improving teaching and learning.
- For Priority Schools, reports will include evidence of implementation of the turnaround model.

Educational Leadership Coaching: School Support Team Leaders who work directly with SIG schools currently serve as Educational Leadership Coaches. The leaders are trained in leadership strategies and coaching by Dr. Karla Reiss, author of *Leadership Coaching for Educators* (2006). The Educational Leadership Coaches read the SIG applications and the SIG school improvement plans via the WISE Tool. Therefore, they know what the action plans are and what implementation steps should be evident. During site visits, the coaches monitor implementation of the plan and provide timely feedback. As an additional support, leaders provide coaching comments through the WISE Tool.

The Educational Leadership Coaches meet with the individual principals more frequently than the scheduled team visits, and follow up after each School Support Team visit and each report. In addition, Educational Leadership Coaches visit the schools at least once a month to work specifically with the principal to develop his or her leadership capacity. The coaches provide additional support by attending and facilitating Professional Learning Community (PLC) meetings, and completing classroom observations.

Mid-year and end-of-the-year surveys are completed by the Educational Leadership Coaches as another tool to gather feedback to make necessary changes as the SEA continues to improve its support and service to schools. Priority Schools will continue to be served by the Educational Leadership Coaches pending funding.

Oklahoma Data Review Model: The SEA is currently using a portion of SIG reserve funds to provide on-site data analysis to SIG schools. Data Facilitators formally monitor progress at least three times a year at each SIG school. The purpose of the Data Reviews is to analyze school benchmark assessment data at the student level in reading, mathematics, and other content areas and to analyze how performance relates to the state standards/CCSS. Other data to be reviewed may include student behavior and professional activities. The purpose of the Oklahoma Data Review is to develop timely action steps to be implemented at the district, school, and classroom level to improve teaching and learning. The goal is for the school leadership team to ensure that individual teachers have a focused summary of the Data Review in order to monitor progress of students, subgroups, and class groups.

The Office of School Support/School Improvement will continue to facilitate Data Reviews at each Priority School. Priority School staff in attendance will include the principal, school leadership team, content/grade level team leaders, parents, and students, when appropriate.

Focus Schools and Title I schools will be offered professional development in how to implement the Oklahoma Data Review Train-the-Trainer Model. The train-the-trainer model is designed to build the capacity at the district/school level to conduct the Data Reviews with district/school staff.

SIG Principals' Academy: During the summer of 2011, a SIG Principals' Academy was conducted by the Leadership and Learning Center. Presentations were focused on best practices. During the summer of 2012, another SIG Principals' Academy will allow principals to share challenges and successes and determine appropriate action steps. The Principals' Academy will expand to all Priority and Focus schools as funding is available.



Key Take Away for Section 2.G: The SEA provides significant resources for capacity building at the SEA, LEA, and school site levels. All capacity building efforts will be enhanced as the SEA provides targeted interventions to schools based on a Differentiated Recognition, Accountability, and Support System.

Tennessee

Principle 2: State-Developed Differentiated Recognition, Accountability, and Support

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A.i Provide a description of the SEA's differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA's plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA's differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Tennessee recognizes and supports the principle that the USED has an interest in ensuring that states implement effective accountability systems so that all children have the opportunity to succeed in school and in life. Through Race to the Top, we have created a framework and process for ensuring that all LEAs, schools and classrooms are focused on advancing student achievement for all children. Our current and proposed action steps further the principles outlined by the Council of Chief State School Officers in its recent recommendations for state accountability to the USED, and represent a system that is tight on top-line goals, supported by effective state policy and management, but driven by local innovation and execution.

Tennessee's accountability and reporting system is rooted in the following beliefs about federal, state and local responsibilities.

Federal: We believe that the USED has the responsibility to require states to maintain rigorous state-established top-line goals for both student achievement and for closing the gap between different sub-groups of students. The USED has the responsibility to monitor annual progress against these goals, and to report and highlight the progress of states against these goals. In the case of Tennessee, the USED also signs off on implementation of TDOE's Race to the Top plan, which includes most key reforms designed to improve state results. Additionally, through this waiver, the USED retains a significant accountability lever: the ability to withdraw the waiver from the state and return the state to the current federal mandates if the state fails to make progress against its goals.

State: We believe that the state has the responsibility to set all interim benchmark goals, to define our measurement system, and to report to the USED. While the federal government can and should require states to maintain rigorous state-established top-line goals, it is the state's responsibility to figure out the interim measures that will lead to achieving the top-line goals. The state also has the responsibility of defining the measurement tool, including how to measure growth in outcomes and reduce gaps in student achievement. Additionally, the state has the responsibility of signing off on LEA goals, measuring LEA and school-level progress every year (disaggregated by student sub-groups), and reporting LEA and

school results publicly. Because the state is responsible for ensuring the attainment of state-level goals, the state also has the duty to support LEAs that are failing to make progress against goals, and to intervene in the lowest-performing schools.

LEAs: We believe that LEAs should receive greater freedom and flexibility when they are successful, support when they demonstrate progress but are failing to reach ambitious goals, and intervention when their results regress or demonstrate growing gaps between groups of students. LEAs are responsible for setting achievement targets, subject to state approval, and for implementing the reforms needed to hit these targets. LEAs are responsible for managing their schools to ensure that they make progress against goals. When schools fail to make progress, LEAs have the obligation to work with the state to develop plans for improvement. When schools perform at the very bottom of the state performance curve, the state has the obligation to remove LEA oversight. In all other cases, though, the LEA has management responsibility, and maintains accountability for student growth and outcomes.

Outline of Tennessee's proposed accountability system

The core elements of the accountability plan TDOE proposes in place of the current NCLB provisions provides for the following:

- In place of the annual designation of AYP for LEAs and schools, a state accountability system requiring, in aggregate, significant growth in student achievement in core subjects, and cutting the achievement gap between different sub-groups of students.
- In place of an AYP structure that eventually designates most schools in the state eligible for state takeover, an accountability structure that identifies the top performing schools for recognition and creates meaningful, tailored interventions for the bottom 5 percent of schools in absolute performance and the 10 percent of schools with the largest achievement gaps state-wide.
- Flexibility in spending allowing LEAs to expand services for low-income students, and freedom that strongly encourages and rewards success by offering greater flexibility for schools and LEAs reaching ambitious targets.

Already, through Race to the Top, Tennessee has committed as a state to significantly raise student achievement levels and has created a process in which LEAs set student achievement growth goals in collaboration with TDOE. We propose to use that framework for an accountability system focused on increasing student achievement proficiency levels by a steady rate each year, while reducing achievement gaps by a significant but realistic level each year.

We also are guided by several key principles. First, through aligning our goals across all layers of the education system, we are better able to measure what works, provide information and resources from the state to LEAs, and position LEAs to operate with flexibility to innovate in the effort to achieve ambitious goals. We do not believe that direct state intervention in schools generally is an effective strategy for driving improvement (unless substantial changes in operations are made, as in the Achievement School District). We do believe that holding LEAs accountable for results, and providing information and resources, will help feed a continuous improvement cycle when goals are aligned.

Second, we premise our goals on growth against the current baseline. While the current AYP targets are predicated on every LEA reaching 100 percent proficiency at the same time, we believe these goals are both unrealistic and de-motivating. However, we do believe that all students, classes, schools and LEAs have equal capacity to improve against their current baseline. As a result, our goals call for each LEA to

have targets of advancing proficiency levels at a steady and ambitious rate over the next four years, and for our LEAs to ask all schools to do the same. Additionally, as described in Principle 3, our teacher and principal evaluation framework uses student growth through value-added scores, ensuring that across the state, we maintain a focus on advancing each child against the current baseline results. This focus on growth against our current performance level meets each child, teacher, principal and LEA superintendent in the right place and creates accountability that is fair but ambitious.

Third, we believe that the same standards should apply for all schools. When we identify the lowest performing schools in the state or the schools with the largest achievement gaps, we should apply those standards to all schools rather than just to Title I schools, and all schools should have access to targeted state support for improvement. While the majority of Tennessee's 1700 schools are Title I schools, we believe that the state should have meaningful accountability for all schools.

State accountability, LEA accountability, and school accountability

Through Race to the Top, Tennessee has committed to grow student achievement, high school graduation and post-secondary attendance rates across the state. This application for flexibility identifies overall goals for student achievement in grades 3-8 reading language arts and math and high school core subjects, as well as specific goals for 3rd grade and 7th grade, high school graduation and postsecondary going as approved by the State Board of Education. These goals reflect changes in the overall levels of proficiency identified in the original Race to the Top application due to increased rigor in the state's standards and assessments.

In particular, Tennessee has set the following top-line goals as critical barometers of our progress:

- Increase third grade reading language arts proficiency from 42 percent in 2009-10 to 60 percent by 2014-15.
- Increase seventh grade math proficiency from 29 percent in 2009-10 to 51 percent by 2014-15
- Increase graduation rates (while simultaneously increasing standards and requirements for graduation) from 82 percent in 2009-10 to 90 percent in 2014-15
- Increase post-secondary enrollment from 46 percent in 2009-10 to 51 percent in 2014-15[4]

LEAs are setting goals in these areas as well, reflecting growth that rolls up to the state's overall goals, and these goals reflect growth in proficiency levels at a rate of around 3 to 5 percent annually on average or approximately 20 percent over five years.

Tennessee, like all states, has a large achievement gap across different groups of students. We believe in the potential of all children and believe that these gaps can and must be closed. We also think that it is critically important to set goals that reflect the difficulty of simultaneously closing achievement gaps and growing achievement for all students. Through this application, we are proposing a measure that would ensure that all students grow achievement levels significantly, but that groups performing at the lowest levels currently (non-white students, economically disadvantaged students, students with disabilities and English Learners) grow proficiency levels faster than other students.

The current AYP measurement process has three main shortcomings in terms of LEA accountability. First, it sets standards for schools that are now generally unattainable. Second, it is a pass-fail system,

[4] Post-secondary enrollment is defined here as graduates of Tennessee public high schools enrolling in Tennessee public or private institutions only.

with little room for nuanced intervention depending on local needs. Third, the measurements used in the system are in many cases opaque, decreasing public understanding of LEA and school goals.

Through this proposal, we aim to measure LEA and school progress in a way that alleviates each of these issues.

LEA accountability

We believe that the most important state function vis-à-vis performance targets is to ensure that LEAs set appropriate goals, provide public, state-level reporting of progress against goals, and provide support to LEAs as they manage their progress locally. We believe that state intervention must be narrowly defined and targeted. Our experience through the past decade suggests that the state is ill-equipped to engage in detailed planning and management with hundreds of schools across the state, and is better positioned to support LEA management of school systems.

At the same time, TDOE can and should engage to support students in habitually failing schools. Additionally, the state can and should support school-level planning processes when LEAs are failing to improve student performance through their own management.

In the following section, we detail the assessments that we will use for state, LEA and school-level AMOs. These AMOs are predicated on the twin pillars of our accountability proposal: we will improve overall student achievement levels at an ambitious but achievable rate; and we will ensure that the students who are farthest behind grow the fastest.

We will ask each LEA to set goals under a category of Achievement measures and a category of Gap Closure measures that aggregate to our state-level goals in both categories. LEAs will then be measured through the following basic system:

- The state will publish the goals for each LEA, and for schools within the LEA.
- The state will report on progress against those goals.
- When LEAs hit the majority of their goals, the state will continue to support them and provide flexibility where possible to innovate.
- When LEAs miss half or more of their goals, the state will provide differentiated levels of intervention, depending on the LEA progress. LEAs that are making progress, but at a slower rate of growth than desired, will have a lower tier of intervention. LEAs that are moving backwards in achievement will have a higher level of intervention, including public identification on the list of LEAs in need of improvement, with increased state engagement and decreased LEA flexibility.
- Regarding gap closure AMOs specifically:
    - When LEAs reach their achievement gap closure goals (i.e., successfully show that the students with the greatest needs advance the fastest), the state will continue to support them and provide flexibility where possible.
    - When LEAs miss achievement gap goals, the state will provide differentiated levels of intervention. LEAs that are demonstrating increased student achievement, but are failing to reach gap-closure goals, will have a lower tier of intervention. LEAs in which any sub-group is moving backwards in student achievement in both elementary/middle school and high school levels will have a higher level of intervention, including public identification on the list of LEAs in need of improvement, with increased state engagement and decreased LEA flexibility.

- LEAs that meet both the aggregate student achievement goal and the gap reduction goal for a given year would be commended to an exemplary LEA list, freed from state goal-setting processes and reporting requirements for that year, and, where possible, granted increased latitude in funding flexibility.
- LEAs that improve in overall achievement and gap reduction but do not "achieve" across either or both Achievement and Gap Closure categories will have to submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE discussion and approval. This process will be developed by TDOE.

School accountability

In compliance with the rules of this application for regulatory relief, Tennessee proposes to have two types of school-level accountability: 1) absolute accountability for growth against current baselines; and 2) relative accountability in which schools are measured against their peers.

In absolute accountability for progress, Tennessee believes that the state role generally should be helping LEAs in goal-setting, publishing results for all schools, and providing transparent information for parents. State-to-school interventions should be limited to the system of relative accountability, where the state may engage (often in conjunction with LEAs) with priority, focus, and reward schools. Therefore, Tennessee's accountability for school growth is centered on the following activities.

- **Transparency:** To ensure transparency regarding Tennessee's accountability plan and student achievement, annually, TDOE will publish a report card grading all schools on an A, B, C, D, F scale. The report card will share information about student achievement scores in aggregate and by subgroup, trajectory of growth based on longitudinal data (value-added scores using Tennessee's TVAAS data), rates of participation in testing, and the size of all achievement gaps. TDOE already issues a report card for every school in the state. See Appendix 3 for current report card.
- **Absolute Performance Accountability (AMOs):** By holding LEAs accountable for LEA AMOs that are aggregated from school performance, we are creating a system where LEAs are responsible for and incented to identify and intervene with schools that are missing their AMOs. LEAs that are not achieving their goals overall are required to submit an LEA plan for improvement that specifies interventions the LEA will take with specific schools. Through LEA-led planning, and through transparent reporting of progress, the state will ensure progress in all schools for all children.
- **Relative Performance Accountability (Priority, Focus, and Reward schools):** Tennessee has demonstrated a strong commitment to turning around the state's lowest performing schools through the creation of the Achievement School District. In compliance with this application, Tennessee is also proposing additional processes to drive increased performance in chronically low performing schools and the schools with the largest achievement gaps in the state. Our focus at the state level will be measurement, public accounting, and targeting financial and planning resources to support improvement. Finally, Tennessee proposes to recognize and reward our top performing and fastest growth schools in the state. Details about each category are summarized below and detailed in subsequent sections.
    - *Priority:* Schools in the bottom 5 percent of overall performance across tested grades and subjects will face one of four interventions: (1) placement in the Achievement School District, (2) turnaround under the governance of an LEA innovation zone, (3) turnaround through one of the federal School Improvement Grant plans, subject to approval by the state; or (4) LEA-led school improvement planning processes, subject to

direct ASD intervention in the absence of improved results.

- *Focus:* Ten percent of schools with the largest achievement gaps, subgroup performance below a 5 percent proficiency threshold, or high schools with graduation rates less than 60 percent that are not already identified as priority schools, will be identified publicly and LEAs will need to submit a plan to TDOE for how to address achievement gaps in all their identified focus schools. LEAs will also have the opportunity to submit a more comprehensive proposal for a competitive grant that in most cases will address interventions specifically focused on improving the performance of English Learners and students with disabilities
- *Reward:* Schools in the top 5 percent of overall performance and schools in the top 5 percent of fastest growth – a total of 10 percent of schools in all – will be recognized publicly, receive financial rewards, and have more opportunities to serve as leaders across the state. Specifically, reward schools will have the opportunity to apply for a substantial competitive grant that will enable them to share best practices broadly.

Conclusion

The attached Appendix 4 depicts the overall accountability system and demonstrates the flow of LEA accountability and school accountability for student achievement results. Overall, we have created a system predicated on the general belief that LEAs are best positioned to manage schools against goals, and state intervention should happen in a limited way and only when LEAs are failing to make progress for groups of students or overall. Descriptions of the relative accountability system—Reward, Focus, and Priority Schools—are in the following sections.

This proposed accountability structure reinforces the goals, priorities, and plan outlined in the state's Race to the Top proposal and provides the flexibility and tailored interventions necessary to ensure that TDOE can significantly increase student achievement and reduce achievement gaps across the state.

Please note: The accountability system and other aspects of this waiver application are contingent upon the legislature passing the necessary changes in state law in the upcoming session. State legislators have been informed of the changes we are seeking, and understand that state laws incorporating elements of the current accountability system (e.g., definitions of AYP), need to be changed if the state is no longer subject to current ESEA accountability frameworks. TDOE staff members, led by the assistant commissioner for legislation and external affairs will work closely with legislators in the upcoming session to make the necessary changes to ensure that this system will be implemented in LEAs and schools no later than the 2012-13 school year.

Furthermore, once ESEA flexibility for Tennessee is approved, TDOE's FTTT office will work with the U.S. Department of Education Race to the Top office to propose a budget amendment to align some of the dollars allocated on turnaround work to the state's new accountability system.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	Option B
☐ The SEA only includes student	☒ If the SEA includes student achievement

achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools, it must: a. provide the percentage of students in the "all students" group that performed at the proficient level on the State's most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.

A) See Attachment 8

B) TDOE will focus our accountability assessments predominantly on reading/language arts and mathematics, with some exceptions for science.

Science assessments will be used when determining:

- **Priority school lists:** Biology I in High School (representing 20 percent weight calculation); TCAP Science in grades 3-8 (representing 33 percent weight in calculation)
- **Focus school lists:** TCAP Science in grades 3-8 (representing 33 percent weight in calculation)
- **Reward school lists:** Biology I in High School (representing 20 percent weight in calculation), TCAP Science in grades 3-8 (representing 33 percent weight in calculation)

We have decided to include a more comprehensive set of assessments that includes science for priority identification (and the corresponding reward identification based on the same methodology) because of the high stakes interventions associated with "Priority" and because we believe that including science both enhances the rigor of our assessment and encourages high achievement in all subject areas, particularly given the importance of science in guiding future job prospects for students. We have also included TCAP science in identifying focus lists because we believe it is important to include at least three areas of assessment for each grade level. High schools have graduation rates to consider in addition to Algebra and English; TCAP science provides a third category of assessment for grades 3-8. We have chosen not to include the social studies assessments, except in composite TVAAS scores, because the standards and cut scores have not been changed commensurate with the other assessments and there is therefore insufficient differentiation in outcomes.

2.B Set Ambitious but Achievable Annual Measurable Objectives

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A	**Option B**	**Option C**
☐ Set AMOs in annual equal increments toward a goal of reducing by half the percentage of students in the "all students" group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. iii. Provide a link to the State's report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the "all students" group and all

		subgroups. (Attachment 8)

Tennessee is focused on two primary measures in our accountability system: Raising absolute proficiency for all students and closing the achievement gap between groups of students. As such, we have developed an accountability system that holds LEAs and schools accountable to: (A) Achievement targets, and (B) achievement Gap Closure targets.

We determined achievement targets based on growing the number of students who are proficient or advanced on state assessments by approximately 3 to 5 percent each year, or 20 percent over a five year trajectory, using our Race to the Top measures and state board-approved benchmarks as the primary barometer. Additionally, we have set a target of closing achievement gaps for students in key under-performing sub-groups (non-white students, economically disadvantaged students, students with disabilities, and English Learners) by approximately 6 percent annually, or 50 percent over eight years. In effect, these targets satisfy a modified "Option A": in eight years, the percentage of students in the "all students" group and in each subgroup who are not proficient will be reduced by half. Additionally, in eight years, the achievement gap will also be halved. We believe that an eight-year timeline is ambitious but feasible, and we believe that LEAs and schools will manage aggressively against the benchmarks because they believe they are feasible.

An explanation of our AMOs is detailed below. Please refer to Appendix 5 to see the numeric targets for the State AMOs.

(A) Achievement Targets

At the 3-8 grade levels[5] we have set Achievement AMOs for percent of students who are proficient or advanced[6] in:

- 3rd grade Math
- 3rd grade RLA
- 7th grade Math
- 7th grade RLA
- 3-8 grades aggregated for Math
- 3-8 grades aggregated for RLA

At the high school level we have set Achievement AMOs for percent of students who are proficient or advanced in:

- End-of-course exam for Algebra I[7]

[5] Assessments are not currently administered in kindergarten, first grade, or second grade.

[6] Tennessee state assessments measure proficiency on four levels: (1) Advanced, (2) Proficient, (3) Basic, and (4) Below Basic

[7] We have developed higher level Algebra II and English III exams (that more closely correspond to college- and career- ready standards) but do not yet have baseline data from which we are able to assess and develop AMO

- End-of-course exam for English II[8]Graduation rates

TDOE, in collaboration with LEAs and other stakeholders, determined this set of Achievement measures based on alignment with our Race to the Top goals. We will continue to measure and report out on all Race to the Top goals, which also include college going and credit accumulation goals (see full list at: http://www.tn.gov/firsttothetop/goals.html), but determined a more narrow set of achievement AMOs so that LEAs and schools would be able to focus on state assessments administered at the school level. Understanding that AMOs drive behavior, we have also decided to add aggregate grades 3-8 Math and RLA measures to mitigate an over-emphasis on 3rd and 7th grades.

Following the principles of our current state-wide, state board-approved student achievement goals, we have determined that approximately 3 to 5 percent annual growth in proficiency levels across all subjects and grade levels struck the right balance between what is ambitious and achievable. These goals are consistent with our current Race to the Top plan and with our LEA-level goals in core subject areas. Additionally, we have asked for input from stakeholders in the state and from research experts. This process is briefly described below:

- TDOE convened approximately 20 internal and external stakeholders (including representatives from the Tennessee Higher Education Commission, Tennessee State Board of Education, Governor Haslam's office) as an AMO setting committee. Participants were given baseline data for each of the new AMOs, as well as information regarding the previously established First to the Top AMOs. Participants were given the guidelines to determine goals at the intersection of ambition and attainability.
- The AMO setting committee's proposed growth targets were vetted by research conducted on the achievement gains made by other states. The Center for Education Policy (CEP) has conducted several national studies examining the types of gains experienced on state assessments. One such study (*State Test Score Trends Through 2008-09, Part 1: Rising Scores on State Tests and NAEP* - September 2010) found that between 2005 and 2009 median average yearly gains on state reading tests were 0.8 and 1.8 percentage points for 4th and 8th grade, respectively. Median average yearly gains on state math tests were 1.3 and 1.8 percentage points for 4th and 8th grade. Additionally, another CEP report (*State Test Score Trends Through 2008-09, Part 5: Progress Lags in High School, Especially for Advanced Achievers* - October 2011) analyzing high school achievement tests found that between 2002 and 2009, 55 percent of the 38 states analyzed saw gains between 0.1 and 1.9 percentage points in reading, while 53 percent saw the same percentage point gains in math. Report Card data for a number of other Race to the Top state recipients was analyzed for the 3 most recent years' data and average yearly gains were between 1 and 2 percentage points. Together this research provides strong support for the ambitiousness of Tennessee's AMOs

targets that we can ensure are ambitious and achievable. However, we do intend to add AMOs for these assessments for the 2012-13 school year when sufficient data is available, based on our 2011-12 baseline.

[8] Ibid

and annual progress of 3 to 5 percent growth.

We will also allow provisions for safe harbor based on growth, as demonstrated by Tennessee's value-added growth measure (TVAAS). Safe harbor aligns with the emphasis we have placed on TVAAS in teacher and principal evaluations (and the focus on growing every student, every year), while enabling the primary achievement goals that we have set to align with Race to the Top goals (and the focus on growing school and LEA performance). Additionally, Tennessee has many small, rural LEAs and schools, and the use of proficiency targets alone can lead to data that skews based on shifts in individual student cohorts. Using value-added growth as a safe harbor protects LEAs and schools that advance student performance for individual students.

(B) Achievement Gap Closure targets

We have also determined a state goal to achieve at least a 6 percent annual reduction (and 50 percent reduction over eight years) in the achievement gap between student sub-groups: White and Non-White students; Economically disadvantaged (ED) and non-ED students; English learners (ELs) and non-ELs; and students with disabilities (SWD) and non-SWD.

At the 3-8 grade levels, we have based achievement gap closure targets for 3-8 aggregate math and 3-8 aggregate reading. At the high school level, we have based achievement gap closure targets on Algebra I and English II exams (and will add Algebra II and English III when we have baseline data across the state at the conclusion of the 2011-12 year). We believe that this is a manageable set of assessments that provide a solid demonstration of the degree of achievement gaps in a school and LEA.

It is important to note that our achievement gap closure goals also satisfy the requirement set forth in this waiver application to establish subgroup-level AMOs. The combination of school- and LEA- wide achievement targets in the range of 3 to 5 percent annual growth and 6 percent annual gap closure targets imply subgroup level achievement targets (as exhibited in Appendix 5), that in effect require subgroups that are farther behind to make greater rates of annual progress. We will continue to measure progress of each sub-group against AMO targets, but we nonetheless think it is important to focus on gap closure AMOs rather than subgroup achievement AMOs because:

- While we acknowledge that sub-groups are performing at different rates of proficiency today, we believe communicating different expectations of proficiency for different subgroups at the state level sends the wrong message.
- At the same time, while we aspire towards one day being able to set the same proficiency targets for all subgroups, doing so today would ignore the pervasive achievement gaps that currently exist. Setting the same target for all sub-groups is unrealistic in a framework focused on consistent growth against baselines, and therein, also sends the wrong message.
- We believe that communicating a gap closure measure, in conjunction with achievement measures, focuses the communication on the right messages: we believe all schools and LEAs should realize an ambitious and achievable annual growth rate of approximately 3 to 5

percent across different measures and that this should be done while closing achievement gaps.

For both sets of AMO targets, we are asking LEAs and schools to grow at the same rate in terms of an increase in percentage of proficient and advanced students each year (for Achievement targets) and a decrease in achievement gaps between sub-groups of students (for Gap Closure targets), but for LEAs and schools that are further behind in overall performance or in the size of their achievement gaps, this will represent a faster rate of growth against their baselines. For example, an LEA that currently has 20 percent of its students scoring proficient or advanced on the aggregate 3-8 math measure currently, and sets an AMO of 24 percent in that category, would be aiming for an increase of 4 percent that actually represents 20 percent growth over its baseline. In contrast, an LEA that currently has 64 percent of its students proficient/advanced in the same category with an AMO of 68 percent would be aiming for the same increase in percentage proficient/advanced, but that increase represents only 6.25 percent growth over its baseline. The LEA that is further behind must grow at a faster rate (20 percent vs. 6.25 percent) to achieve the same percentage increase in proficient/advanced. The same principle holds true for LEAs and schools that have larger achievement gaps in trying to achieve their Gap Closure AMOs.

Consequences of failing AMOs

Setting targets that strike an honest balance between ambitious and achievable means that even high-functioning schools will not achieve every target. Therefore, we believe the ability to allow schools and LEAs to miss some AMOs without being identified as "failing" is important.

As described above, we consider Achievement measures and Gap Closure measures as two distinct categories of AMOs. We will assess LEAs and schools based on whether they "achieve" or "miss" the Achievement category (aggregated) and whether they "achieve" or "miss" the Gap Closure category (aggregated).

To "achieve" in the Achievement category, an LEA/school must achieve more targets than it misses. If an LEA misses half or more targets (because all students improved in achievement but did not improve enough or because students' achievement declined), then this would constitute a "miss".

To "achieve" in the Gap Closure category, an LEA/school must:

- Achieve more targets than it misses
- An LEA must not widen achievement gaps because the same subgroup declined in achievement in 3 or more gap target areas (3-8 Math, 3-8 RLA, Algebra I, and English II)[9] , or because subgroups declined in achievement in half or more targets[10]

[9] For example: an LEA must not widen its gap between Economically Disadvantaged students and Non-ED students because ED students declined in achievement in 3-8 Math, 3-8 RLA, or some combination of moving backwards in 2 or more High School measures

Missing either of the above stipulations would result in a "miss" in the Gap Closure category.

Every LEA and school will be evaluated based on the combination of "achieve"/"miss" for Achievement and Gap Closure. However, in line with TDOE's overarching philosophy that the state can best intervene at the LEA level, TDOE will only engage directly with LEAs. TDOE will expect LEAs to engage meaningfully with their schools (and will support LEAs in this endeavor as necessary).

TDOE's interventions with LEAs are outlined as follows:

If an LEA …	**Then, it will:**
Achieves both Achievement and Gap Closure categories	• Be commended to an exemplary LEA list • Be allowed to maintain plans at the LEA level without approval from the state • Be granted increased latitude in funding flexibility (where possible)
Misses Achievement but Achieves Gap Closure	***If achievement declined in half or more targets; OR declined in either 3-8 math, 3-8 RLA, or the majority of HS targets:*** • LEA will be placed on public list of LEAs in need of improvement • LEA must meet with TDOE to support the creation of an aggressive plan for corrective action ***In all other cases:*** • LEA must submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE approval
Achieves on Achievement but Misses Gap Closure	***If gaps widened because the same subgroup had achievement declines in a majority of its gap target areas, or because subgroups declined in achievement in half or more targets :*** • LEA placed on public list of LEAs in need of improvement • LEA must meet with TDOE to support the creation of an aggressive plan for corrective action ***In all other cases:*** • LEA must submit a detailed analysis of the results along with plans for the coming year to achieve goals, subject to TDOE approval
Misses both Achievement and Gap Closure categories	• Be placed on public list of LEAs in need of improvement (for all students and sub-group achievement failures) • Meet with TDOE officials in-person to support the creation of an aggressive plan for corrective action

Please refer to Appendix 4 for a visual representation of AMO failure and consequences. Please also note the safe harbor provisions as well as other assessment standards below.

Process for setting LEA and school AMOs

Upon state board approval of the proposed state AMOs, TDOE will engage with LEAs to determine LEA targets based on the same general philosophy: approximately 3 to 5 percent annual growth for all students beginning with LEA-specific 2010-11 baselines and 6 percent annual gap closure across subgroups. LEAs will similarly engage with schools to establish school level AMOs. An LEA's school-level AMOs will, in aggregate, meet or exceed the LEA level AMOs; LEA-level AMOs will, in aggregate, meet or exceed State-level AMOs.

Please refer to Attachment 8 to review a copy of the average statewide proficiency based on assessments administered in the 2010-11 school year in reading language arts and math for the "all students" group and all subgroups; or to Appendix 5 which outlines TDOE's proposed statewide AMOs.

Assessment standards

Note: assessments will have to fulfill the following standards (for all systems of accountability):

N-Count

For purposes of accountability, TDOE will use an N count of 30 because the prior N count of 45 masks many subgroups at a school level. A sample size or N count of 30 or greater is commonly used to ensure a greater probability that the sampling distribution of the mean will be approximately normally distributed and the results of the analysis can be inferred to the general population.[11] For example, New Jersey uses an N count of 30 for accountability, and Colorado uses an N count of 20 or less, depending on the measure. Research on NCLB N counts (conducted in 2005) demonstrates that a total of 26 states established N counts of 30 or less for subgroup accountability[12].

For purposes of transparency and reporting, TDOE will continue to report data for students in a LEA or school group, with a minimum number of 10.

Participation Rate

- Schools or LEAs must have at least a 95 percent participation rate in the required TCAP accountability tests for all students and for each student subgroup;
- If a school does not meet this participation rate, the school will automatically fail both its

[11] Marion et. al. "Making Valid and Reliable Decisions in Determining Adequate Yearly Progress." Series: *Implementing the State Accountability System Requirements Under The No Child Left Behind Act of 2001*. ASR-CAS Joint Study Group on Adequate Yearly Progress. Council of Chief State School Officers. December 2002.

[12] Porter et. al. "The Effects of State Decisions About NCLB Yearly Progress Targets." Educational Measurement: Issues and Practice. 2005.

achievement and gap closure measures

If a school or LEA meets or exceeds the minimum number of students in a required subgroup and meets the 95 percent participation rate requirement, then that school or LEA must meet annual performance objectives set by the State with the application of a 95 percent confidence interval.

Tennessee determined participation rates for the first time in Spring 2003. Only schools and LEAs that meet the 95 percent participation rate for all students and each subgroup meet AYP requirements unless the size of the subgroup does not meet the minimum number set for participation rate purposes (30). To meet this requirement, the State will use the most current year, the most current two years, or the most current three years of participation rate data.

Schools are responsible for completing answer sheets for any student enrolled in grades and subjects included in the assessment program. The participation rate for all students and required subgroups are determined by the number of students participating in the assessment divided by the number of students enrolled (as indicated by the number of answer sheets). Only students who have a significant medical emergency may be exempted from testing and not counted in the participation rate calculation. Students with invalid assessment scores are counted only in the denominator of the participation rate calculation and are not counted in the numerator. These data are randomly audited for accuracy.

Test Taker Scores

The State will include scores from every student enrolled and tested (every test taker (ETT)) in the school or LEA at the time of assessment administration whether or not enrolled for a full academic year.

Safe Harbor

We propose to have two safe harbor provisions: 1) student growth results from Tennessee Value Added Assessment System (TVAAS); and 2) reduction of the percent below proficient.

TDOE proposes to utilize our student growth results from TVAAS to align with the emphasis we have placed on TVAAS in teacher and principal evaluations (and the focus on growing every student, every year). Additionally, Tennessee has many small, rural LEAs and schools, and the use of proficiency targets alone can lead to identification based on shifts in individual student cohorts. Using value-added growth as a safe harbor provision protects LEAs and schools that advance individual students' performance.

We will also maintain our current provision for safe harbor allowing that a school or LEA may achieve a goal if the percentage of below proficient students (either all students or a particular subgroup depending on the measure) declines by 10 percent from the previous year, 19 percent from two years previously, or 27 percent from three years previously.

English Learners

The State will continue to provide English Learners who are in their first year in a U.S. school an option that may exempt them from one administration of the reading/language arts subtest. Their participation in the TCAP assessments is included in the participation rate but not in the

accountability determination.

Students who are identified as English learners and monitored for two years after they test proficient (Transition 1 and Transition 2 or Monitored Former Limited English Proficient (MFLEP)) are not counted in the EL subgroup to meet the minimum N, but their scores are counted in that subgroup when the minimum N count is achieved by a school or LEA.

Students With Disabilities

Tennessee will continue to permit LEAs to exceed the 1 percent cap on the number of proficient and advanced scores based on the alternate achievement standards that can be included in AYP calculations if the LEA establishes that the incidence of students with the most significant disabilities, as defined by the State, exceeds the limit and if the LEA documents circumstances that explain the higher percentage. Without approval requesting the extension of the 1 percent cap, proficient scores exceeding this cap must be changed to below proficient for accountability purposes. The scores for students with disabilities who take the modified achievement standards assessment will be included in the assessment data in the accountability system so long as the number of those proficient and advanced scores does not exceed 2 percent of all students in the grades assessed at the LEA and State levels.

2.C Reward Schools

2.C.i Describe the SEA's methodology for identifying highest-performing and high-progress schools as reward schools.

TDOE will identify Reward Schools annually based on highest overall proficiency and/or highest overall progress.

To ensure that the State looks at all schools, regardless of their Title I status, we have included all schools in the pool from which we identify Reward Schools. We have also set a target to identify 10 percent of Tennessee schools that exhibit high proficiency and/or high progress based on TVAAS. We believe that highlighting a large number of schools (169 schools, equivalent to 10 percent of all schools) will increase motivation – both for schools to attain and maintain high levels of proficiency as well as for schools that may be starting from much lower levels of proficiency but have the most opportunity to make substantial gains. Whereas the priority and focus lists allow us to identify schools that face additional challenges and to provide resources to have schools better overcome those challenges, we view the reward list as an opportunity to recognize a large number of schools that achieved different types of success.

We have identified two categories of Reward schools, each category representing 5 percent of All Schools for a total of 10 percent:

Achievement-based Reward Schools (5 percent):

- Represent the 5 percent with the highest overall achievement based on percent proficient or

advanced proficiency levels across assessments in school
    - High schools will be assessed based on an equally weighted composite[13] of:
        - Graduation rates
        - End-of-course Algebra I (Percent proficient and advanced)
        - End-of-course English I (Percent proficient and advanced)
        - End-of-course English II (Percent proficient and advanced)
        - End-of-course Biology I (Percent proficient and advanced)
    - Elementary/Middle schools will be assessed based on a TCAP aggregate, which includes and equally weights:
        - Math (Percent proficient and advanced)
        - Reading/Language Arts (Percent proficient and advanced)
        - Science (Percent proficient and advanced)
- Within-school gaps must be smaller than the state median, or if they are larger than the state median they must be narrowing[14]

Progress-based Reward Schools (5 percent):

- Represent the 5 percent of schools with the highest growth based on TVAAS value-added scores
    - Elementary/Middle schools will be assessed based on TVAAS growth composite index scores, which include TCAP Math, Science, RLA, Social Studies (and Algebra I if taken at the Middle school level)
    - High schools will be assessed based on TVAAS growth composite index scores, which include Algebra I, Biology I, U.S. History, English I, and English II
- Within-school gaps must be smaller than the state median, or if they are larger than the state median they must be narrowing [15]

Schools that serve some portion of both high school grades and elementary/middle grades, will be assessed as both school types.

Please refer to Appendix 6 for a step by step outline of TDOE's reward identification methodology.

2.C.ii Provide the SEA's list of reward schools in Table 2.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

TDOE compiled feedback from LEA personnel about how the State and LEAs can acknowledge high

[13] We have developed higher level Algebra II and English III which we will include when we have sufficient data.
[14] This analysis is based on the "gap index" we describe in focus schools; The USED states: "A school may not be classified as a 'highest-performing' school if there are significant achievement gaps across subgroups that are not closing in the school" and "A school may not be classified as a 'high-progress school' if there are significant achievement gaps across subgroups that are not closing in the school." (US Department of Education, *ESEA Flexibility*, September 23, 2011)
[15] Ibid

performing schools at the Federal Programs Directors' Conference we hosted in October 2011. We have also gathered feedback on this subject through a meeting with the Superintendents' Study Council, and a webinar hosted with superintendents from all 136 LEAs across the state. Three resounding themes emerged, from which we have designed our reward system.

1. Meaningful public recognition and honoring:
The annual list of Reward schools will be posted on TDOE's website, the state report card, and publicized through media outlets across the state. Letters of acknowledgement will also be sent to LEAs listing their reward schools and highlighting ways the LEAs can publicize and reward their high performing schools.

2. Financial rewards:
Beyond public recognition, TDOE will also provide financial rewards. TDOE will create a competitive grant process for reward schools to share their best practices with other schools which we expect will strengthen their existing programs. Each school, with the approval of its LEA, will be eligible to apply for funds. Financial rewards will allow the school to create a thorough description of their instructional improvement program and provide funds for publication, travel and visitation. Grant decisions will be based on innovation and opportunities for scalability.

3. Leadership opportunities among schools:
Reward schools will also be honored as leaders across the state. We believe that the designation of being a Reward school is an opportunity to serve as a key strategic partner in the work to raise achievement levels across the state; the best way to drive improvement across all schools is by leveraging the thinking, best practices, and credibility of those schools that are already doing a great job.

To this end, Reward schools will be asked to consider serving as Ambassadors to other schools, meaning a Reward school would: analyze its best practices; share best practices with neighboring schools by hosting visiting staff or conducting school visits to other schools; create mentorship opportunities between its staff and neighboring schools' staff. TDOE will provide the necessary financial and other resources to support Reward schools to carry out these additional functions.

We anticipate that we will be able to allocate approximately $2 million toward reward schools annually beginning in 2012-13.[16]

2.D PRIORITY SCHOOLS

2.D.i Describe the SEA's methodology for identifying a number of lowest-performing schools equal to at least five percent of the State's Title I schools as priority schools.

[16] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

Priority schools will be identified every 3 years based on an evaluation of all Schools' (expanding beyond just Title I schools) 3-year achievement data. Schools must have a minimum of two years of data (i.e. they must have been in operation for 2 years) to be considered.

In order to identify the bottom 5 percent of schools in overall achievement, we will consider the performance of all students on the following state assessments.

High schools will be assessed based on an equally weighted composite[17] of:

- Graduation rates[18]
- End-of-course Algebra I (Percent proficient and advanced)
- End-of-course English I (Percent proficient and advanced)
- End-of-course English II (Percent proficient and advanced)
- End-of-course Biology I (Percent proficient and advanced)

Elementary/Middle schools will be assessed based on a TCAP aggregate, which includes and equally weights:

- Math (Percent proficient and advanced)
- Reading/Language Arts (Percent proficient and advanced)
- Science (Percent proficient and advanced)

Schools that serve some portion of both high school grades and elementary/middle grades, will be assessed as both school types.

Because Title I schools predominate in the bottom five percent of all schools, expanding the "Priority" mandate to identify five percent of all Schools results in a greater number of Title I schools identified as Priority. In the draft Priority list submitted with this application based on current data, we have identified a total of 85 priority schools all of which are Title I schools, representing nearly 8 percent of all Title I schools. While the decision to include all schools requires greater state intervention and support covering a greater number of schools, we believe this is the right thing to do because it ensures: (1) all schools are held to the same standards, and (2) more of the lowest performing schools get the additional support they need to be successful.

Please refer to Appendix 7 for a step by step outline of TDOE's priority identification methodology.

2.D.ii Provide the SEA's list of priority schools in Table 2.

[17] We have developed higher level Algebra II and English III which we will include when we have sufficient data.

[18] To mitigate unintended consequences from using graduation rate as an indicator by itself, we have included graduation rates as part of the composite measure for high schools. Any high school with a graduation rate of less than 60 percent that is not identified through this priority methodology is automatically included on the focus list, as is mandated by the ESEA flexibility application guidance.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

In the short-term, identified priority schools will face one of four types of interventions:

1) Enter the TDOE-run Achievement School District (ASD)
2) Enter an LEA-run "innovation zone" (that affords schools flexibilities similar to those provided by the ASD) that an LEA has applied to create and that TDOE has approved
3) Apply and be approved by TDOE to adopt one of four SIG turnaround models
4) Undergo LEA-led school improvement planning processes, subject to direct ASD intervention in the absence of improved results.

By 2014-15, the bottom five percent of schools will all be served through one of the first three categories. Each of the first three categories, as described below, meets the U.S. Department of Education's turnaround principles for interventions, including:

- Strong leadership by reviewing principals and providing operational flexibility
- Strong instruction by reviewing teachers and providing professional development
- Flexibility to redesign learning time and instructional program
- Focus on data and on school environment
- Ongoing community engagement

Over time, as the ASD expands capacity and as LEAs establish effective innovation zones, we envision all priority schools to be served by one of these channels.

The Achievement School District

Overview of the Organization

In January 2010 the Tennessee legislature enacted the First to the Top Act – the most sweeping education law passed in Tennessee in over two decades. Among the most notable components of this new, bipartisan legislation was the creation of The Achievement School District ("ASD" or "the district"), a wholly new division of the State's Department of Education. The ASD is a key component of Tennessee's strategy to address the persistently poor performance of some of its schools. Modeled after the Recovery School District in Louisiana, the ASD has the ability to take over and operate persistently poor performing schools, or to authorize charter schools.

Further affirmation of Tennessee's bold vision for reforming public education for its schoolchildren followed in the form of two substantial federal grants. First, in March 2010, Tennessee was named as one of only two states to receive a grant award in the first round of the federal Race to the Top competition. Next, in August, and in partnership with Louisiana's Recovery School District and New Schools For New Orleans, Tennessee's Department of Education was awarded $30 million in the highly competitive Investing in Innovation (i3) federal grant program designed to support and expand high-quality charter schools.

ASD Design

The primary functions of the ASD fall into five categories: oversight, facilitation, human capital, operations and support. Below is a table that shows the kinds of activities that fall under each category. This list is not exhaustive, but is meant to illustrate the ASD's main oversight and facilitation functions (occurring at the state-level) and human capital, operations, and support functions (at the school level).

State Level Work

Oversight	*Facilitation*
• Identify schools to enter the ASD • Select intervention strategies (charter or direct-run) • Hold all schools accountable for results and, when necessary, for compliance	• Develop policy • Oversee public affairs

School Level Work

Human Capital	*Operations*	*Support*
• Employ teachers and leaders to work in ASD schools • Administer HR programs • Oversee performance management systems	• Transportation • Food Service • Technology • Maintenance • Purchasing	• Instructional Services • Professional Development • Grants Administration

Per the table above, the ASD will employ two primary intervention strategies to dramatically increase student achievement – (1) convert the school into a charter school, or (2) replace the LEA and manage the daily operations of the school.

Charter Conversions. The ASD will use best-in class charter operators to transform schools wherever possible. In this scenario, the ASD's role will be to:

- Identify, recruit and cultivate highly effective charter management organizations, both home-grown and nationally recognized, to turnaround schools as a first option.
- Grant flexibility in exchange for a high degree of accountability for outcomes
- Provide transition support via i3 funding to ensure the charter operator has ample planning time and support for a successful school launch
- Evaluate performance every 2 years leading to a robust renewal process

Direct-run Conversions. In addition to authorizing high-quality charter operators, the ASD will scale up priority interventions by also directly running great schools. In this scenario, the ASD's role will be to:

- Invest heavily in recruiting and in human capital management in order to secure a highly effective school staff
- Hire the turnaround team (principal and lead teachers) at least six months in advance to allow for a robust induction program.
- Employ charter-like flexibility and autonomy over hiring, budget, schedule, and program.
- Maintain tight control over scope and sequence, assessments, professional development, and performance management.

Among the identified priority schools, the ASD will determine which schools to absorb based on two factors: (1) student achievement growth, and (2) feeder pattern analysis. Priority schools that are geographically clustered with the worst growth will be the first contenders for an ASD conversion outlined above.

School Support Team. The ASD will support its charters and direct-runs schools through a lean and flexible school support team. The approach to building the school support team will be:

- Outsource all functions that non-ASD entities can perform well
- Maximum flexibility and authority in staffing
- Utilize exceptional generalists who can shift to different roles at different times
- Invest in key capacity ahead of growth

Stakeholder Engagement. The ASD is committed to open, honest engagement with stakeholders. The ASD role in engaging communities through the turnaround process will be:

- Listen and learn even as we share our convictions and expectations
- Empower communities to provide input at all stages of the turnaround process (e.g. school identification, charter operator selection, principal/teacher hiring)

To this end, the ASD has already hosted community forums at four ASD-eligible schools this year, gathering input from hundreds of parents and community members.

Schools will enter the ASD for a period of at least five years with return of the management of the school subject to both the school and the home-LEA meeting performance goals.

Consistent with state law, the use of the full per-pupil funding, facilities and transportation services for all students within the school would be accessible to the ASD.

ASD Autonomy

In order for the ASD to optimize its ability to successfully improve student achievement in the Priority Schools, it must operate as a nimble, service-oriented organization that moves resources quickly in order to support the turnaround efforts in its charter and direct-run schools. The additional autonomy the ASD requires are as follows:

Funding. The ASD must control the local, state, and federal funding attributable to each school placed in its jurisdiction, and must have the same authority to seek, expend, manage, and retain funding as that of an LEA .

Facilities. The ASD must have the right to use any school building and all facilities and property otherwise part of the school and recognized as part of the facilities or assets of the school prior to its placement in the ASD.

People. In the ASD direct-run schools, the employees of the school may be deemed employees of the ASD. The ASD must have the authority to select, hire, and assign staff to positions in the school as needed to support the highest-possible quality faculty in the school. All existing staff within and ASD school will be required to re-apply for a position with the ASD. The ASD must have the same salary autonomy and flexibility afforded to any LEA.

Procurement. The ASD must have the same authority and autonomy afforded to any LEA under state law regarding the procurement of goods and services. This includes but is not limited to personal,

professional, consulting, and social services; and the procurement and/or leasing of property.

Current Status of ASD

Since winning the Race to the Top award in March 2010, the Tennessee Department of Education has been moving ahead with its ambitious reform agenda. Year 1 of the grant was designated as a planning year for the ASD and one in which low performing schools and LEAs are being assessed for entry into the new District.

The election of a new Governor on November 2, 2010, and the subsequent state-level leadership transition resulted in a large portion of the planning year occurring with the Superintendent position open. On April 5, 2011 Governor Haslam swore in Kevin Huffman as the Commissioner of Education. A month later, Commissioner Huffman hired Chris Barbic to serve as the first superintendent of the Achievement School District. Barbic started in this new role on August 1, 2011.

Prior to serving as Superintendent, Barbic founded YES Prep Public Schools, a Houston-based charter management organization (CMO) that exists to increase the number of low-income Houstonians who graduate from a four-year college prepared to compete in the global marketplace and committed to improving disadvantaged communities. Barbic led YES Prep for thirteen years and grew it from a single campus serving 300 students to a charter management organization of ten schools on track to serve 10,000 low-income students in Houston. YES Prep is often recognized as one of the highest-performing CMOs in the country and has served as a model for preparing low-income students for success in the collegiate environment.

Over the course of the last three months, the ASD team has been working on the following:

Co-Managing 5 Campuses. The ASD is currently working jointly with four Memphis City Schools and one Hamilton County School (Chattanooga) to influence decisions about staff, academics, non-academics, culture, and budget/finance. In this role, the ASD is providing "coordinated" supports and services to schools and helping the co-managed schools make smart choices with their SIG resources. The ASD is closely monitoring the schools' progress in order to determine whether or not each school is a candidate for charter or direct-run conversion.

Building the Launch Plan. The ASD spent the first two months building out a launch plan. The launch plan includes:

- Guiding principles
- Goals
- Growth scenarios
- Strategic Priorities
- Potential risks
- Monthly planning calendar (18 months out)
- Workforce and organizational development plan
- Budget template
- Stakeholder engagement framework

Building Capacity. The workforce plan mentioned above is driving the staffing plan for the ASD. While

the ASD will be a lean and nimble support office, it must have the capacity to effectively authorize and manage the charter and direct-run conversions. During the course of the first three months, the ASD has hired a Chief Strategy Officer, a Charter Portfolio Director, and a Data Director.

Engaging the Community. A key strategic priority is open and honest communication with the community. The ASD team has met with dozens of stakeholders and has held four community forums in Memphis to gather input on the four co-managed schools.

Launching the Charter and i3 Application Process. The charter application for 2012-13 charter conversions began on August 1st and the ASD team in conjunction with leading teacher education organizations has been working to evaluate both the charter and i3 applications. The first round of charters and i3 award recipients will be announced in mid-November.

ASD Exit Criteria

The default is return school to local control in 5 years contingent upon the following:

(1) A majority of parents do not vote to keep school in ASD (i.e. "parent trigger" not activated); and
(2) Commissioner's discretion/evaluation of LEA's ability to ensure ASD-like context for school. This will be evaluated based on the LEA's ability to:
    - Attract and support partners: match schools to models and improvement strategies/partners
    - Coordinate school support: reduce or eliminate unnecessary interference from LEA and state; clear path to promised autonomies for schools.
    - Foster human capital: attract talent from both inside and outside the LEA by crafting incentives and favorable conditions
    - Provide monitoring and oversight over school performance: collect, analyze, and disseminate data (e.g. issuing school report cards, designing progress metrics).
    - Secure resources: Coordinate with other state and LEA offices (e.g., grants management) to be sure turnaround schools receive priority.

While certain ASD schools may improve student achievement and no longer be in the bottom 5 percent (priority school), these schools will remain in the ASD for the minimum of five years. In addition, new schools that fall into the bottom 5 percent will be eligible for the ASD charter conversion or direct-run options.

LEA Innovation Zones

Given the difficult nature of turnaround work and our focused commitment on quality in all we pursue, we do not plan to rapidly scale the ASD. In current plans, the ASD will charter and direct-run approximately 35 schools in its third year (2014-15). This represents less than half of the Priority Schools. And while the ASD was established as an exception because we also believe the very lowest-performing schools will not improve with business as usual, we also believe that, whenever possible, LEAs should be the point of intervention with failing schools.

In addition to the ASD, we believe that LEAs can establish innovation zones that have similar flexibilities to the state-run ASD, and that will allow for greater local innovation when conducting turnarounds in the worst schools. LEAs must capitalize on the urgency of persistently failing schools to develop an innovative, service-oriented model of school support.

An LEA Innovation Zone achieves this by

- Streamlining supports from multiple offices rather than creating additional bureaucracy
- Creating a framework for low-performing schools based on opting-in to high-potential reforms rather than a punitive framework
- Ensuring that low-performing schools are prioritized in not only talk but also action
- Protecting school and Lead Partner level authority to deliver results

An LEA Innovation Zones represents a powerful mechanism to turnaround Priority schools because the Innovation Zones (1) create local and sustainable capacity to engage in meaningful turnaround of Priority Schools, and (2) ensure close coordination and collaboration between the LEA and the ASD.

The legislation creating the ASD calls for the Priority School to be given back to local control after five years. Creating an LEA innovation zone creates capacity within the LEA to successfully build upon the turnaround strategies implemented by the ASD and ensure the long-term sustainability of student achievement gains at the campus level once the school is returned to the LEA. Ramping up both the ASD and LEA innovation zone will require close coordination and collaboration between TDOE and the LEA. This coordination will ensure TDOE and LEA capacity are being deployed in the most effective and efficient manner possible.

TDOE will approve and support the creation of LEA-directed innovation zones. TDOE will flow federal and state funding ear-marked for priority schools to the LEA if the LEA has: (1) developed a clear, realistic plan for developing an innovation zone, and (2) demonstrated evidence that the LEA will be able to afford the innovation zone the necessary flexibility to be effective (e.g. new policies adopted by school boards). TDOE will provide organizational support by clearly defining the expectations of roles and responsibilities of an LEA innovation zone, and by allocating state resources to help LEAs create an operating structure in line with these expectations for all stakeholders (outlined below).

We believe that creating incentives for other LEAs across the State to create a similar type of innovation zone is a great example of an additional role TDOE can play to effectively turn around Priority Schools. Below is an explanation of the roles and responsibilities of the various stakeholders in creating the LEA innovation zone.

<u>Requirements of the LEA</u>

- *Structure:* Establish an Innovation zone office
- *Build Management Capacity:* The LEA innovation zone requires sufficient management flexibility to undertake the work successfully. Hire (internally or externally) a leader for the innovation zone office with the authority to hire his/her staff, with at a minimum, one full-time employee per priority school and one full-time data analyst for the office
- *Provide Governing Autonomy:* Allow schools, under governance of the innovation zone office, to have autonomy over financial, programmatic, staffing, and time allocation decisions. The Innovation Zone must be directly linked to and empowered by the superintendent to implement time-critical initiatives quickly.

<u>Requirements of the School Board:</u>

- *Provide Governing Autonomy:* Pass policy, as necessary, to allow schools, under governance of the innovation zone office, to have autonomy over financial, programmatic, staffing, and time

allocation decisions

Requirements of the Innovation Zone office:

- *Foster Human Capital:*
  - Attract talent from both inside and outside of the LEA by crafting incentives and favorable conditions (e.g., allow principals to build their own teams; provide specialized training for principals; develop clear recruitment incentives and selection criteria/processes for turnaround teachers; performance contracts for teachers with hiring and dismissal flexibility)
  - Liaise with other partners working on developing human capital
- *Monitoring and Oversight:* Directly oversee the priority schools absorbed by the Innovation zone in LEA
  - Hold schools accountable for student achievement based on data analysis; establishing and monitoring against goals, benchmarks, and timelines for student achievement
  - Hold LEA support services (e.g. transportation, budget, facilities) that serve priority schools accountable for effective and efficient delivery based on metrics the innovation zone will establish
  - Provide transparency and access to key stakeholders
- *Service-oriented support:* Organize as a comprehensive, service-oriented unit that can serve clusters of priority schools (addressing feeder patterns within LEAs).
  - Communicate with LEA to establish priority in delivery of support services (e.g. contracts, management, technology)
  - Secure direct access to the superintendent
  - Administer SIG and other grants
  - Pursue outside funding opportunities
- *LEA leverage:* The innovation zone should be developed as a LEA platform to afford flexibility, autonomy, and accountability to specific schools that are unlikely to succeed under business-as-usual.
  - Over time, the innovation zone should plan to scale in a similar fashion as the ASD. In order to build a strong foundation, growth will be limited in the first few years to a count of schools that can be managed effectively and comprehensively.
  - We expect that scale-up of an LEA innovation zone would be similar to the scale-up of the ASD: approximately six schools in the first year. An LEA innovation zone must propose and TDOE must approve the number of schools an innovation zone can absorb each year. This decision will be based on past success.
- *Build management capacity:* Hire (internally or externally) a leader for each school with the authority to hire his/her staff
- *Provide Technical Assistance:* Directly or through external partners (as decided and monitored by the Innovation Zone) to assist school strategic planning, stakeholder engagement, and execution of interventions

Requirements of Priority schools absorbed by the Innovation Zone:

- *Operate with Managerial Autonomy:* school leadership will make decisions around financial, programmatic, staff and time allocation
- *Accountability:* school leadership will be held accountable on the managerial decisions that have been made based on the net impact on student achievement

Requirements of TDOE:

- *Provide financial support:* Federal and state funding for a priority school will be channeled directly to the LEA innovation zone for the priority schools that the innovation zone absorbs
- *Provide management support:* Dedicate state resources to LEA innovation zones
- *Accountability:* Monitor progress annually through AMOs and on-site visits by state officials

Consequences of Failure

- If in 2 years, the school's student achievement does not improve, then the school will be absorbed the ASD
- LEA innovation zones that have slower rates of improvement across schools compared to the ASD will lose the right to expand into new schools, until achievement growth in their existing schools improves to ASD levels

LEA/School-led SIG Turnaround

Corresponding to SIG turnaround funding and interventions today, LEAs can apply to TDOE for their priority schools that are not absorbed by the ASD or LEA Innovation zones to adopt one of four federal interventions: (1) turnaround model, (2) transformation model, (3) closure, or (4) restart. These school plans must address each of the areas identified in the ESEA Flexibility Guidance for Priority schools.

LEAs must complete the SIG application, specifying the federal model proposed for each school and describing in detail how the robust and dramatic interventions will be implemented. TDOE will evaluate each application based on its comprehensiveness and feasibility; the State intends to only grant funds to realistic, effective plans. LEAs with TDOE approved school plans will receive SIG funding to implement the turnaround.

Consequences of Failure

- If in 2 years, the school's student achievement does not improve, then the school will be absorbed by the ASD or by an LEA innovation zone

LEA-led school improvement

To ensure success, the ASD and LEA innovation zones must scale thoughtfully and with measured growth. To ensure SIG turnaround applications are meaningful and truly competitive, school plans that do not meet a high bar for efficacy and feasibility should not be approved. As the ASD and LEA-led innovation zones scale, some schools in the bottom five percent of performance that do not receive SIG funding will require another type of intervention. TDOE will rely on LEAs to manage and closely monitor school improvement in these schools until either the ASD or an effective LEA innovation zone is able to absorb them.

All priority schools that fall into this fourth category will be absorbed either by the ASD or an LEA innovation zone by 2014-15. However, in the event that a school on this list is able to achieve its AMOs for 2 years in a row on its own, thereby showing substantial growth in results, it will be released from "priority" with no more aggressive intervention.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround

principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA's choice of timeline.

We have identified a draft list of 85 schools based on 5 percent of 1,687 schools, and we anticipate that our final list determined in the summer of 2012 (which will include 2011-12 data) will have a similar number. We will serve this first cohort of priority schools using a combination of the four interventions outlined above.

Beginning in 2012-13 school year, we anticipate that the ASD will have the capacity to manage approximately 6 schools – 3 schools through direct ASD run operations and 3 schools through charter organizations. We will also work with the LEAs with identified priority schools (there are 3 LEAs identified in the draft lists submitted with this application but there may be more when we re-run the final list next summer 2012) to either establish innovation zones or, in the case of LEAs that already have some version of an innovation zone, make necessary refinements to their current structures to ensure that they will offer similar flexibilities to schools as the ASD. We anticipate that, at a minimum, 3 LEAs will decide to adopt innovation zones that meet the requirements outlined above and that they will be able to each operate 3 schools, in line with what the ASD will also be able to direct run in the first year. Of the remaining approximately 70 schools, we anticipate that the majority will apply for SIG turnaround grants and that through our competitive screening process some portion will gain approval. If we estimate that roughly half will begin SIG turnarounds, then the remaining 35 schools will be managed directly through LEA-led turnarounds.

In 2013-14, we anticipate that the ASD will scale and have capacity for an additional 12 schools (through a combination of direct-run and charter). Similarly, we anticipate that LEA innovation zones will also scale and have capacity for an additional 9 schools collectively. The capacity for 25 new schools to have access to more comprehensive interventions either through the ASD or through their LEA innovation zones will be filled by 25 schools that were being managed directly through the lower-level LEA-led turnaround intervention. The decision around which schools would be handed off from the LEA to the ASD or the LEA-innovation zone would be made based in part through collaborative conversations between the ASD and the LEA.

After the end of the 2013-14 school year and before the start of the 2014-15 school year, all priority schools will be evaluated on academic progress. If in 2 years, any LEA innovation school's student achievement does not improve, then the school will be absorbed by the ASD. If any LEA innovation zone has slower rates of improvement across schools overall compared to the ASD, then the LEA innovation zone will lose the right to expand into new schools until achievement growth in their existing schools improves to ASD levels. If in 2 years, any SIG turnaround school's achievement does not improve sufficiently, then the school will be absorbed by either the ASD or by an LEA innovation zone that is able to expand into new schools. If in 2 years, a school in LEA-led turnaround does not appear to be making enough progress to get off the priority list for the 2nd cohort (to be identified in the fall of 2014 and inducted beginning in the 2015-16 school year), then it will be absorbed by either the ASD or by an LEA innovation zone that is able to expand into new schools.

To demonstrate how progress across the four groups of schools may work, we have an approximate timeline below. Under any scenario, we will have no schools in the LEA-led turnaround category by 2014-15.

Illustrative: 85 Schools – approximate anticipated timeline

	2012-13	Change	2013-14	Change	2014-15
ASD	6 schools	+ 12	18 schools	+17	35 schools
LEA Innovation zones	9 schools	+ 9	18 schools	+12 - 2	28 schools
SIG turnarounds	35 schools		35 schools	- 13	22 schools
LEA-led turnaround	35 schools	- 21	14 schools	- 14	0 schools

Note: an increase in schools in the ASD or LEA Innovation zones corresponds to increased capacity. A decrease in schools in LEA innovation zones corresponds with schools that are absorbed by the ASD; a decrease in schools in SIG turnaround or LEA-led turnaround corresponds with schools that are absorbed by the ASD or effective LEA innovation zones.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

Schools will exit "priority" status when:

- Three years later, a school is not identified in the next "priority" list that is identified by TDOE; or
- A school passes its achievement AMOs two years in a row

However, priority schools that enter specific interventions will be required to fulfill the entire length of the intervention:

- ASD: five-year minimum requirement (see ASD section above for full exit criteria description)
- LEA Innovation zone: to be determined by each LEA
- SIG turnaround: 36-month intervention

2.E FOCUS SCHOOLS

2.E.i Describe the SEA's methodology for identifying a number of low-performing schools equal to at least 10 percent of the State's Title I schools as "focus schools."

We have identified focus schools based on any of the following three pathways, as mandated in this waiver application:

1. High schools with a three-year average graduation rate less than 60 percent that have not otherwise been identified as "Priority" (automatic)
2. Schools with any sub-group(s) with less than 5 percent composite "proficient or advanced" performance on the Math, RLA, and Science portions of the TCAP exam for grades three through eight; or composite "proficient, advanced, or graduated" performance on Algebra and English assessments and graduation rates in high school, and have not been identified as Priority (automatic)
3. Schools with the largest within-school gaps between the highest-achieving subgroup and the lowest achieving subgroup (highest gaps to threshold of up to 10 percent of schools in the state)

1. Graduation rate:
After identifying our priority list, we automatically included any high school with a graduation rate less than 60 percent. In the draft list we submitted with this waiver application, we identified 1 school through this pathway.

2. Sub-group performance below threshold:
We determined a composite threshold of 5 percent, because state intervention is necessary in a school with severely low academic achievement. In the draft list we submitted with this waiver application, we identified 26 schools through this pathway.

3. Gap analysis:
There are many ways we explored defining a "gap" but we ultimately decided that Tennessee's focus school list should reflect schools that have the largest and most pervasive achievement gaps. Furthermore, we decided that there would be two forms of "safe harbor": (1) if a school has reduced its achievement gaps by 6 percent annually (equivalent to the annual gap closure AMO), or (2) if all subgroups are performing at or above the state subgroup median.

To determine "largest" gaps, we accounted for both the degree of a gap between complementary sub-groups (e.g. 40 percent gap between White and Non-White students), and the percent of the school population size in the underperforming group (e.g. Non-White students are the under-performing subgroup and comprise 50 percent of the student body).

To determine "most pervasive" gaps, we looked at the pervasiveness of a gap between the same sub-groups across assessments and high school graduation rates; we considered the gaps between multiple sets of complementary subgroups; and we also used three years of data to capture pervasiveness of gaps over time.

We assessed gaps between the following four sets of complementary sub-groups:

- White vs. Non-White[19]
- Economically Disadvantaged (ED) vs. Non-ED
- English learners (EL) vs. Non-EL
- Students with disabilities (SWD) and Non-SWD

At the high school level for our draft list submitted with this application, we assessed achievement gaps based on an equally weighted composite of:

- Graduation rates
- End-of-course Algebra I (Percent proficient and advanced)
- End-of-course English II (Percent proficient and advanced)

For grades three through eight, we assessed achievement gaps based on an equally weighted composite of the TCAP, including:

- Math (Percent proficient and advanced)
- Reading/Language Arts (Percent proficient and advanced)
- Science (Percent proficient and advanced)

To ensure that small population sizes would not skew the analysis, we established that any sub-group cohort with an N less than 30 would be suppressed.

We identified 142 schools based on the achievement gap pathway, reaching a total of 169 focus schools, which represent 10 percent of all schools in the state.

Please refer to Appendix 8 for a detailed step-by-step explanation of our methodology.

2.E.ii Provide the SEA's list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA's focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Interventions

All focus schools will have their names published in a list distributed to the public on the state's website and will have a "focus" designation on the school report card. All LEAs that have focus schools must submit a LEA-wide plan for how the LEA will manage achievement gap closure initiatives at the LEA level and for every identified focus school. In order to ensure these plans will be effective, TDOE's nine field service centers (FSCs) will work with LEAs to identify schools with that have common characteristics to the LEAs' focus schools but are achieving much better results, in order to

[19] "Non-white" is a composite that includes: African American, Hispanic, Native American, Asian, and Hawaiian Pacific Islander. It is important to note that Asian and Hawaiian Pacific Islander students tend to outperform white students across assessments and thus can have the effect of skewing the non-white category. However, because Asian and Hawaiian Pacific Islander students represent a very small percentage of the student body (less than 2 percent aggregated) , we have decided to keep them among the "non-white" category for simplicity in the focus school analysis.

learn from the higher-performing schools. FSCs will seek to identify schools at the same level (e.g., elementary schools with other elementary schools) and similar needs, so that the plans that the LEAs design and implement will have the greatest possible chance of success. Moreover, TDOE and the FSCs will look for initiatives that have proven effective among Reward schools that have successfully made strides in closing achievement gaps in similarly situated sub-groups.

Additionally, all LEAs with focus schools will have the opportunity to apply for a competitive grant put forth by TDOE. In order to be competitive a LEA must develop plans to take on a some of the following initiatives:

- Time on Task
- Extended school day
- Cultural competency education
- Co-teaching opportunities
- Family support/community services
- Root cause analysis
- Feeder patterns within LEA
- Inter-school strategic staffing of school leaders and teachers
- Intra-school strategic staffing of teachers

Grants of approximately $100,000 per school will be offered to LEAs with focus schools on a competitive basis. TDOE will fund these competitive grants from a combination of Title I, Part A, 1003 (a) school improvement funds, Race to the Top funds, and/or state funds to approximately 100 focus schools.[20] Interventions are anticipated to be implemented over a two year period.

For focus schools where the gaps widen or little progress is being made, TDOE officials will meet in-person with the LEA to review their improvement plans and to assist with plan revisions, if needed. Improvement plans must be approved by TDOE.

Timeline
Focus schools will be identified once every 3 years, in line with priority identification. The first identification will occur in summer 2012. Competitive grants may be allocated for the maximum grant award period of the funding source.

2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

Schools will exit "focus" status when:

- Three years later, a school is not identified in the next "focus" list that is identified by TDOE; or
- A school passes its gap closure AMOs two years in a row

[20] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA's list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

LEA Name	School Name	School NCES ID #	REWARD SCHOOL	PRIORITY SCHOOL	FOCUS SCHOOL
See Attachment 9 for Tennessee's List of Reward, Priority, and Focus Schools					
TOTAL # of Schools:					

Total # of Title I schools in the State: __1120_____
Total # of Title I-participating high schools in the State with graduation rates less than 60%: ___9_____

Key	
Reward School Criteria: **A.** Highest-performing school **B.** High-progress school **Priority School Criteria:** **C.** Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the "all students" group **D.** Title I-participating or Title I-eligible high school with graduation	**Focus School Criteria:** **F.** Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate **G.** Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate **H.** A Title I-participating high school with graduation rate less than

rate less than 60% over a number of years **E.** Tier I or Tier II SIG school implementing a school intervention model	60% over a number of years that is not identified as a priority school

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

2.F Describe how the SEA's differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA's new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Incentives

We believe that transparency through state reporting and local management through district control will continue to be the primary drivers of action for local schools. However, unlike the accountability system under NCLB where 80 percent of Tennessee schools would be "failing" this year, the differentiated system we are proposing will return meaning to transparent reporting.

All schools and LEAs will continue to receive an annual report card with full transparency on:

- Progress against AMOs
- School status as Reward, Priority, or Focus
- Achievement data by assessment, by sub-group performance
- Growth data by sub-group performance
- Participation and Graduation rates
- School environment
- School profile

To help the public synthesize transparency across multiple types of data, all schools will also receive a letter A-F grade (in addition to the public lists of reward, priority, and focus schools and the public lists for exemplary LEAs and LEAs in need of improvement). Letter grades will have the most impact differentiating schools that are not priority, focus, or reward, and differentiating schools within LEAs that have been designated exemplary or in-need-of-improvement. We believe that making data fully available and providing a clear synthesis of the implications of the data will enable school communities to better understand the state of their schools and the levers for improvement.

Tennessee provides letter grades in our report card today (see Appendix 3). Upon approval of this waiver application, we intend to re-align our grading system with this new differentiated accountability system. The school report card will continue to be managed by TDOE's Office of Accountability.

Support

TDOE will maintain a statewide system of support through our 9 regional field service centers (FSCs). FSC staff serve a mission critical role as a conduit between TDOE and LEAs. They provide LEAs with a range of support, including data analysis and training to help LEAs assess root causes of achievement challenges (which will be increasingly important under this new accountability system) as well as support implementing new statewide initiatives aimed at improving performance broadly (including teacher and principal evaluations and common core transitioning).

The most effective way TDOE can drive school improvement broadly, through all principles under this

waiver, is to enhance support to LEAs through the FSCs. We intend to maximize support to LEAs by reducing our reliance on external vendors and building capacity in-house, particularly in field service centers. Increasing the number of regional staff will ensure that LEAs have more individual support; doing so in house will ensure that the support provided is always high quality. TDOE will place a particular focus in building FSC capacity in: technical assistance, data support, and content area specialists (e.g., English Learners, students with disabilities, K-8 Math, etc.).

Because a significant piece of our new accountability proposal relies on district management, we intend to drive most of our support for Title I schools through differentiated support for districts. As described earlier in this section, we intend to provide significant latitude for districts that are both increasing achievement and reducing achievement gaps at ambitious levels. We will provide school improvement planning support for districts that are making progress but not reaching goals. And we will provide significant school planning supports for districts that are moving backwards. Essentially, in districts that do not demonstrate the capacity to increase achievement and reduce gaps, TDOE will use internal staff to engage directly with school planning. In districts that are making progress, we intend to use our FSCs to support the districts in managing their school improvement planning locally.

Increasing FSC capacity will benefit all LEAs and their school improvement planning, but LEAs that have been identified "in need of improvement" (due to missing Achievement AMOs, Gap Closure AMOs, or both) will receive varying degrees of additional attention. FSC staff will be more deeply engaged in supporting LEAs to develop differentiated plans for schools based on their characteristics and challenges. TDOE will ultimately sign off on the school improvement plans for all LEAs "in need of improvement".

2.G Build SEA, LEA, and School Capacity to Improve Student Learning

2.G Describe the SEA's process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:

i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;

ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and

iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA's differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).

Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

We are excited by the opportunity to build significant, sustainable capacity in LEAs, and in doing this,

to substantially enhance LEA support for schools. Throughout this application we have reiterated our philosophy of holding LEAs accountable on behalf of their schools and of working through LEAs to support schools. We believe that the main path to success in the state is by supporting LEAs and building their capacity, rather than through punishment and intervention. In this section, we seek to add credence to this philosophy by outlining the additional resources we will commit to schools through LEAs.

TDOE will allocate a substantial pool of funding toward Priority and Focus schools, beginning with approximately $40 million in School Improvement Grant (SIG) funding in 2012, the majority of which we anticipate flowing through LEAs (see Appendix 9 for an outline of timeline and resources).[21] This funding will enable LEAs to build up LEA staff capacity, to invest in robust data systems, and to develop rigorous and innovative school improvement plans that are not constrained by current budgets. The impact of this funding will have spillover effects for all schools in an LEA. A portion of this funding will also enable TDOE to build up state staff capacity to monitor LEA and school progress, and to support LEAs (particularly in TDOE's regional field service centers) with technical and operational assistance.

Specifically, TDOE will support LEAs responsible for priority and focus schools by creating financial incentives for implementation and providing monitoring and technical assistance resources:

Support for Implementation

Priority schools

We will distribute approximately $40 million[22] for priority schools in the next year, and anticipate allocating further resources in the next few years. This funding will be used to: strengthen the ASD, incent LEAs to build LEA innovation zones, and support realistic, innovative SIG plans that are not constrained by current budgets.

In order to ensure that priority interventions are successfully implemented, it is imperative that the foundations for the ASD and the LEA innovation are firmly established and that SIG turnarounds continue to be funded sufficiently. We believe that targeted investment in the ASD and LEA innovation zones will enable them to scale more quickly and ultimately absorb all schools that are not succeeding in other LEA-led turnarounds.

Although interventions will look different depending on whether a school is being managed by the ASD, an LEA innovation zone, or an LEA either through a SIG turnaround process of an LEA-led turnaround, all funded interventions will guided by USED's "turnaround principles":

- *Provide strong leadership*
  - Both the ASD and LEA innovation zones have the mandate to appoint new school leaders and grant them operational and financial flexibility

[21] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

[22] Once ESEA flexibility for Tennessee is approved, the state will propose an amendment to its Race to the Top plan to align some of the dollars allocated on turnaround work to the state's new accountability system. Any dollar figures cited are contingent upon: the continuation of SIG funding, Race to the Top approval, and/or the reallocation of other state funds.

- SIG turnaround grantees are required to review the performance of the current principal and to replace the principal as necessary
- LEAs leading school turnarounds will be encouraged to make leadership changes to avoid the risk of having a school absorbed the ASD in later years

- *Ensure teachers are effective and able to improve instruction*
  - Both the ASD and LEA innovation zone school leaders have the ability to create favorable conditions to maintain and develop current staff and to attract new talent
  - SIG turnaround grantees are required to review the performance of the current staff and to make changes as necessary
  - LEAs leading school turnarounds will be encouraged to make staffing changes to avoid the risk of having a school absorbed the ASD in later years
- *Redesigning the school day, week, or year*
  - Both the ASD and LEA innovation zone school leaders have the authority to redesign the school day as needed
  - SIG turnaround grantees are required to review the design of the class schedule and to make changes as necessary
  - LEAs leading school turnarounds will be encouraged to consider schedule redesign to avoid the risk of having a school absorbed the ASD in later years
- *Strengthen the school's instructional program*
  - Both the ASD and LEA innovation zone school leaders have authority over programmatic decisions
  - SIG turnaround grantees are required to review the school's instructional program and to make changes as necessary
  - LEAs leading school turnarounds will be encouraged to consider instructional changes to avoid the risk of having a school absorbed the ASD in later years
- *Use data to inform instruction and continuous improvement*
  - Both the ASD and LEA innovation zone will have allocated data specialists who will be responsible for analyzing data to develop instructional strategies
  - SIG turnaround grantees are required to demonstrate the use of data in decision-making
  - LEAs leading school turnarounds will receive support from TDOE FSCs to conduct data analysis
- *Establish a safe and supportive school environment*
  - All priority schools will be monitored through FSC field visits on school environment factors
- *Provide ongoing mechanisms for family and community engagement*
  - All priority schools will be monitored through FSC field visits on family and community engagement initiatives

<u>Focus schools</u>

We believe that the attention and public accountability for particularly large achievement gaps alone can kick start a school into effective action. To inspire ingenuity and innovation, TDOE will also support a competitive grant process where approximately 100 schools will receive $100,000 to invest specifically in initiatives targeted at closing the achievement gap (anticipating approximately $10 million to be spent on focus schools), pending U.S. Department of Education's approval of a Race to the Top budget amendment. This will allow schools to hire additional support to extend learning time, fund community services that will positively impact students, propose and test innovative

solutions for solving the achievement gap challenges specific to the school, or undertake other targeted initiatives.

Monitoring and Technical Assistance

Priority schools

There are 85 priority schools across 3 LEAs. Because of the clustering of priority schools, TDOE can provide concentrated LEA monitoring and technical assistance. Specifically, TDOE will allocate one full-time employee to any LEA with 5 or more priority schools. This will ensure that TDOE will have dedicated staff to not only monitor LEAs and schools based on clear goals and interim benchmarks (as we do today), but to engage in more thorough and time intensive monitoring activities that require staff members to spend more time on site, working collaboratively with LEA staff and schools. Greater TDOE staff time allocated on site will also increase accountability of LEAs and schools as TDOE staff will be able to better understand the challenges and possibilities in a given school and LEA.

Focus schools

There are 169 focus schools across over 60 LEAs. Because of the dispersion of focus schools, it makes sense for TDOE to work with LEAs to determine a system for monitoring focus schools' progress, where clear goals and interim benchmarks would be mutually agreed upon between TDOE and the LEA, and the LEA would be held responsible for monitoring and reporting progress. If progress is insufficient, TDOE will provide additional technical assistance to LEAs through FSC staff with expertise in strategies for improving achievement for specific subgroups of students. LEAs that received funding for focus schools through the competitive grant process will have set a timeline for results in their application. If there is insufficient progress in these focus schools, TDOE has the right to revoke the grant.

TDOE will vet and approve LEA selections for any external providers they choose to support priority or focus interventions. The ASD is already vetting all charter applicants through a rigorous new process from the National Association of Charter School Authorizers (NACSA). To get a sense of the rigor applied through this process, in the first round of this process only 3 charter organizations were advanced out of 8 applicants. Similarly, TDOE intends to create other rigorous review mechanisms to assess any external providers selected by LEAs and funded by SIG or Race to the Top funds. All external providers must be signed off on by TDOE.

More broadly, all LEAs in Tennessee will have the authority to decide if and how they wish to provide public school choice and choice-related transportation to students attending Title I schools. LEAs may also provide extended learning time or targeted remediation services that specifically address the student's individual academic needs. TDOE will continue to provide an approved list of external providers for LEAs that continue to use supplemental education services (SES) funding.