

ELEMENTARY AND SECONDARY EDUCATION ACT (ESEA) FLEXIBILITY REQUEST

ADDITIONAL SUBMISSION A

December 1, 2011

As allowed by the U.S. Department of Education (USDE), the Oklahoma State Department of Education (State Education Agency [SEA]) is submitting additional information as clarification of Oklahoma’s *ESEA Flexibility Request*.

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## **Section 1.B (page 22) – Key Milestones**

Oklahoma has provided a timeline for statewide professional development to support the full implementation of college- and career-ready (CCR) standards, including the Common Core State Standards (CCSS). In the timeline provided, funding was listed as a significant obstacle. SEA leadership is currently reviewing professional development budgets and realigning professional development priorities to ensure that the most critical activities receive necessary funding. The four activities listed in Section 1.B – Hiring REAC<sup>3</sup>H Coaches; Providing Curriculum Mapping Software; Facilitating Collaboration between Higher Education Faculty and PK-12 Educators; and Facilitating Collaboration between Career and Technical Educators, Business Representatives, and PK-12 Educators – are the top professional development priorities for the State in terms of implementation of CCR standards.

The SEA expects to be able to provide necessary funding for all four activities and will have all budgets finalized in order to meet expected timelines; however, if full funding is not available, the SEA will assign fewer REAC<sup>3</sup>H Coaches to more schools during the transition to CCSS. Additional funding will be secured in the fiscal year beginning July 1, 2012, to implement the full range of statewide professional development activities outlined in this section.

## Section 2.A (page 30) – Timeline for Development of A-F School Grading System

Oklahoma is in the process of finalizing the development of the state’s A-F School Grading System. We are following the legal process to incorporate the system into Oklahoma’s Formal Rules. The timeline for completing the process is found in Table 1.

Table 1.

<b>Activity</b>	<b>Date</b>
Rule Impact Statement Filing	December 28, 2011
Publication in Oklahoma Register	January 17, 2012
Draft of Rules Released for Public Comment	January 18, 2012
Public Hearing	February 16, 2012
Approval by Oklahoma State Board of Education	March, 2012

## Section 2.A (page 30) – Definition of Terms

The current plan for determining reading and mathematics gains referenced in #2 and #3 of the A-F School Grading System will be calculated at the student level in the same manner as is described for the AMO gains, pending public comment as part of the permanent rule adoption process described in the previous section. This system is defined as follows.

The student learning gains in Mathematics are 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 8<sup>th</sup> Grade OCCT Math score is compared to the Algebra I EOI scores 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 on page 42 of the ESEA Flexibility Waiver Application. 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 scores. This number is converted to a standard score ranging from 20-80 points.

The student learning gains in Reading are 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 8<sup>th</sup> Grade OCCT Reading score is compared to the English II EOI scores 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 on page 42 of the ESEA Flexibility Waiver Application. The total number of reading points received for a site or district is summed and divided by the total number of students with two years of reading scores. This number is converted to a standard score ranging from 20-80 points.

The definitions will be finalized according to the timeline referenced in the previous section.

It is possible that Oklahoma will develop a model for calculating student learning gains based on scale scores upon implementation of a vertical scale for all statewide assessments. This would allow for growth to be documented within proficiency levels as well as between proficiency levels. The model would need to be validated and approved through the rule-making process before adoption as part of the A-F School Grading System.

## **Section 2.A (page 31); Section 2.C (page 46); Section 2.D (page 52); Section 2.E (page 60) – Identification of Reward, Priority, Focus, and Targeted Intervention Schools Using the A-F School Grading System**

Initial identification of Reward, Priority, Focus, and Targeted Intervention Schools is detailed in Sections 2.C, 2.D, 2.E, and 2.F, respectively. This identification will take place immediately upon approval of the *ESEA Flexibility Request*. Unless changes are required to the identification methodologies, the schools that will be identified based on 2011 data are listed in Appendix 9 of the *Request*.

Beginning in 2012, identification of Reward, Priority, Focus, and Targeted Intervention Schools will be based on the State's A-F School Grading System as explained in Sections 2.C, 2.D, 2.E, and 2.F; however, additional schools may be named as Reward, Priority, and Focus schools in order to ensure that the definitions provided by USDE are met as explained below.

**Reward Schools:** Schools that receive a School Grade of A or A+ will be identified as Reward Schools. In addition, any school that would be identified as a Reward School using the same methodology outlined for 2011 but using the most current data available will also be named as a Reward School.

**Priority Schools:** Schools that receive a School Grade of F will be identified as Priority Schools. In addition, any school that would be identified as a Priority School using the same methodologies outlined for 2011 (Category 1, Category 2, and Category 3) but using the most current data available will also be named as a Priority School.

**Focus Schools:** Schools that receive a School Grade of D, D+, or D- will be identified as Focus Schools. In addition, any schools that would be identified as a Focus School using the same methodologies outlined for 2011 (Method 3, Method 4, and Method 5) but using the most current data available will also be named as a Focus School.

**Targeted Intervention Schools:** Schools that receive a School Grade of C, C+, or C- will be identified as Targeted Intervention Schools.

## **Section 2.C (page 46) – Definition of Terms**

The gains for the High Progress Reward Schools were initially calculated differently from the gains calculated for the AMOs and proposed for the A-F School Grading System. The High Progress Reward School gains were calculated at the school level instead of the student level based on 2011 data. Students received 4 for Advanced, 3 for Proficient, 2 for Limited Knowledge, and 1 for Unsatisfactory Scores in each of Grades 3-8 OCCT Reading and Mathematics, Algebra I EOI, and English II EOI assessments. The points were summed and divided by the number of students taking each assessment to produce an index score. The index scores for each assessment given at the site were summed and divided by the number of content areas assessed. For example, if a site gave Algebra I and English II EOIs, the index scores from each of these two assessments were summed and divided by two. If a site gave all four assessments, the four index scores were summed and divided by four.

These index scores were calculated for the most recent three years for all of the sites in Oklahoma. The index score from three years ago was subtracted from the index score of the most recent year. These differences were rank ordered by gains. The top 10% were identified to be Reward Schools if there were positive gains between each of the years; the school had not received a School Improvement Grant; the school did not have achievement gaps between subgroups that were not closing; and, if a high school, the school was in the top 20% of schools with the largest gains in graduation rate over the last three years.

In the future, Reward Schools will be determined by the definition above based on the most current data available or by making an A or A+ in the A-F School Grading System. Making an A or an A+ will take into account high performance and the definition above will take into account high progress.

## **Section 2.D (page 52) – Capacity Determination**

District capacity for supporting Priority Schools will be determined based on evidence provided by LEAs to the SEA for committee review. The evidence will need to show that the LEA can implement the Turnaround Principles as defined in Section 2.D of the *ESEA Flexibility Request*. The following categories of information should be included in the LEA’s evidence.

### **GENERAL INDICATORS OF CAPACITY FOR SCHOOL IMPROVEMENT**

#### **Historical Data Analysis**

- Data for a period of five years:
  - School and district OCCT scores in reading/language arts
  - School and district OCCT scores in mathematics
  - School and district graduation rates
  - School and district dropout rates
  - School and district attendance rates
  - School and district suspension rates and behavior records
  - School and district teacher/principal attrition rates
  - School and district mobility rates
  - School and district enrollment data, including subgroups
- Historical analysis of data over a period of five years and evidence that historical data has been used to develop school-level interventions (data should include, but is not limited to, the categories listed above)
- A plan for developing school-level interventions for the upcoming school year based on historical and current data (data should include, but is not limited to, the categories listed above)

#### **District Expectations Communicated to All Stakeholders**

- Strategic, yet attainable, goals at the district and school level (including goals for each subgroup)
- A communication plan for involvement of all stakeholders in meeting annual goals
- Analysis of the percent of district’s annual goals that have been met each year for five years

#### **Academic Supports**

- District curriculum aligned to state standards
- School and classroom alignment to district curriculum expectations
- A plan for periodic progress monitoring in reading/language arts
- A plan for periodic progress monitoring in mathematics
- Periodic benchmark assessments aligned to state standards
- Use of periodic benchmark assessments and other student data to inform classroom instruction
- Timely, effective student interventions in classrooms
- Data system that collects, stores, and disseminates timely school- and student-level academic data
- Timely and equitable distribution of textbooks and instructional materials aligned to state standards
- Timely district interventions when a school is not making progress
- School board’s unified vision for school improvement

#### **Organizational Supports**

- Human resource policies that effectively recruit, hire, induct, and retain effective school personnel and release ineffective personnel in a timely manner
- Timeline to place certified personnel at the site when filling vacancies

- Equitable distribution of highly qualified and effective teachers
- Strategies for recruitment of teachers and administrators
- Information technology supports aligned with district/school academic goals
- Transportation aligned with district/school academic goals (District transportation ensures students are in school prior to start of school day. Bus schedules ensure students attend school in a timely manner.)
- Local, state, and federal funds aligned to subgroup academic goals
- Local, state, and federal funds use to purchase research-based programs, materials, and professional learning opportunities
- Special Education resources aligned with the needs of the students
- English Language Learner resources aligned with the needs of the students
- Plan for maintaining a safe and orderly environment

## **INDICATORS OF CAPACITY SPECIFIC TO TURNAROUND PRINCIPLES**

### **Strong Leadership**

- Details of how performance of a current principal or a new principal (with a proven track record for turning around schools) will be reviewed for hiring, retention, or dismissal
- Details of how principals will be given operational flexibility in the areas of scheduling, staffing, curriculum, and budget

### **Effective Teachers**

- Details of how the performance of current teachers or new teachers (with proven track record for success in challenging schools) will be reviewed for hiring, retention, or dismissal
- Policy for preventing ineffective teachers to transfer to the school

### **Extended Learning Time**

- Plan for extended learning time (beyond the regular school day) for student learning and teacher collaboration

### **Research-Based Instruction**

- Strong instructional program that is research-based, rigorous, and aligned with state standards

### **Use of Data**

- Time for principals and teachers to analyze data to inform instruction for continuous improvement

### **School Environment**

- Strong support for school safety and discipline, addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs

### **Family and Community Engagement**

- Strong ongoing family and community engagement

## Section 2.D (page 53) – Requirements for Priority Schools

As stated in Section 2.D, LEAs with identified Priority Schools will be required to implement the Turnaround Principles defined in this ESEA waiver package. LEAs that are unable to demonstrate capacity to do so 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 the C3S. Implementation of Turnaround Principles in the C3S is defined in Section 2.D.

LEAs that are able to demonstrate capacity to implement the Turnaround Principles will retain control of the school. Implementation of Turnaround Principles in Schools *not* in the C3S is defined below.

**Implementation of Turnaround Principles in Schools not in the C3S:** For those Priority Schools in LEAs that have demonstrated capacity to implement the Turnaround Principles, the LEAs must operate the schools according to the following Turnaround Principles:

- The LEA 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.
- In conjunction with the LEA, 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.
- 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.
- 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 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.

## Section 2.D (page 52) and Section 2.E (page 61) – Title I Eligible Schools

All local education agencies with designated Title I, or Title I eligible **Priority Schools**, will be held accountable for ensuring those schools are fully supported by applying the long standing principle of ‘best use’ of all funding resources; such as, state and local funds, and especially, Title I, Part A program funds. The Title I, Part A funds should target and support intervention strategies that are aligned to the principles included in the Turnaround Principles. With this in mind, LEAs are strongly encouraged to consider all Title I Priority and Title I eligible Priority sites within their district for receiving Title I funds. Specifically, the SEA strongly encourages LEAs to support with Title I funds those Title I eligible Priority sites that have never been served with Title I funds. This can be accomplished by requiring that the district perform an intensive review of each site’s needs assessment, numbers of students from low-income families, student assessment data, school attendance data, graduation rate, numbers of highly qualified teachers, viable curriculum and a curriculum aligned to CCSS. By reviewing the needs assessment and all data pertinent to the reason the school has been identified as a Priority School, the LEA, along with the site principal, will be able to make highly informed decisions regarding how that site will best utilize Title I program funds. These Priority sites that have never participated in receiving federal program funds may begin operating as Title I Schoolwide sites according to procedures established by the Office of Federal Programs.

All local education agencies with designated Title I, or Title I eligible **Focus Schools**, will be held accountable for ensuring those schools are fully supported by applying the long standing principle of ‘best use’ of all funding resources; such as, state and local funds, and especially, Title I, Part A program funds. The Title I, Part A funds should target and support intervention strategies that are best suited for the school. With this in mind, LEAs are strongly encouraged to consider all Title I Focus and Title I eligible Focus sites within their district for receiving Title I funds. Specifically, the SEA strongly encourages LEAs to support with Title I funds those Title I eligible Focus sites that have never been served with Title I funds. This can be accomplished by requiring that the district perform an intensive review of each site’s needs assessment, numbers of students from low-income families, student assessment data, school attendance data, graduation rate, numbers of highly qualified teachers, viable curriculum and a curriculum aligned to CCSS. By reviewing the needs assessment and all data pertinent to the reason the school has been identified as a Focus School, the LEA, along with the site principal, will be able to make highly informed decisions regarding how that site will best utilize Title I program funds. If a Title I eligible Focus School that has never participated in receiving federal program funds implements interventions consistent with the Turnaround Principles, the Title I eligible school may begin operating as Title I Schoolwide site according to procedures established by the Office of Federal Programs.