Oklahoma will be C³ by 2020: All children will graduate from high school College, Career, and Citizen Ready by 2020. Amended: November 20, 2014
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State Contact for the ESEA Flexibility Request

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Position and Office: **Assistant State Superintendent, School Turnaround, C3 Schools, and School Choice**

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<tbody>
<tr>
<td>Janet C. Barresi</td>
<td><strong>(405) 521-4885</strong></td>
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Signature of the Chief State School Officer:

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The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.
By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled ESEA Flexibility Frequently Asked Questions enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State’s proficient level of academic achievement on the State’s assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.

2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.

3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.

4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.

5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement 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 a school in any of its priority and focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.

6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State’s priority and focus schools.
7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State’s reward schools.

8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.

9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.

10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State’s priority schools.

Optional Flexibility:

An SEA should check the box below only if it chooses to request a waiver of the following requirements:

The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (i.e., before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.
ASSURANCES

By submitting this application, the SEA assures that:

☒ 1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.

☒ 2. It will adopt English language proficiency (ELP) standards that correspond to the State’s college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)

☒ 3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State’s college- and career-ready standards. (Principle 1)

☒ 4. It will develop and administer ELP assessments aligned with the State’s ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)

☒ 5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)

☒ 6. 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 uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA’s differentiated recognition, accountability, and support system. (Principle 2)

☒ 7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools. (Principle 2)

☒ 8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later the deadline required under the State Fiscal Stabilization Fund. (Principle 3)
9. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)

10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.

11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).

12. Prior to submitting this request, it provided notice and information regarding the request to the public in the manner in which the State customarily provides such notice and information to the public (e.g., by publishing a notice in the newspaper; by posting information on its website) and has attached a copy of, or link to, that notice (Attachment 3).

13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

If the SEA selects Option A or B in section 3.A of its request, indicating that it has not yet developed and adopted all guidelines for teacher and principal evaluation and support systems, it must also assure that:

14. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2011–2012 school year. (Principle 3)
An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State’s Committee of Practitioners regarding the information set forth in the request and provide the following:

1. A description of how the SEA meaningfully engaged and solicited input on its request from teachers and their representatives.

The Oklahoma State Department of Education (State Education Agency [SEA]) has four primary methods of communicating and collaborating with teachers, administrators, and their representatives: (1) email listserves, electronic newsletters, and web postings, (2) videoconference network and webinars, (3) surveys, (4) focus groups and advisory committees, including the Regional Educators Advancing College, Career, and Citizen Readiness Higher (REAC3H) Network, which is the State’s communication network for initiative implementation (detailed in Overview Section and Section 1.B).

**Email listserves, electronic newsletters, and web postings:** The SEA operates a variety of email listserves specific to various content area teachers and supervisors, counselors, curriculum specialists, and administrators. The agency also uses govdelivery services to deliver electronic newsletters to email subscribers. In 2013, OSDE delivered 5,795,134 bulletins to 171,956 subscribers encompassing various audience groups. In addition, the SEA posts information and resources on the SEA’s web site. Beginning in the fall of 2009, the SEA has provided numerous communications to teachers, administrators, and their representatives regarding the adoption of the Oklahoma Academic Standards (OAS), which included the Common Core State Standards (CCSS) for English language arts and mathematics until the 2014-2015 school year, and the Teacher and Leader Effectiveness Evaluation System (TLE). In 2011, bilingual educators were given web links for the revised World-Class Instructional Design and Assessment (WIDA) Language Development Standards 2012 in order to provide comments on the realignment of the WIDA standards to the Oklahoma Academic Standards. Since the fall of 2011, the SEA used these methods to provide information to teachers, administrators, and their representatives regarding the State’s Differentiated Recognition, Accountability, and Support System as part of the State’s entire ESEA Flexibility Request (see Attachment 1: Notice to LEAs) as well as up-to-date information regarding implementation of the State’s A-F School Grading System. While these are primarily one-way communication tools, they do spur personal conversations between LEAs and the SEA. For example, one email listserve message caused several administrators to study the TLE in depth and to provide significant feedback to the TLE Commission. This feedback is reflected in the work detailed in Section 3.A of this request.

**Videoconference network and webinars:** The videoconference network and webinars provide two-way communication with teachers, administrators, and their representatives. Beginning in the fall of 2009, the SEA has used the statewide videoconference network to host collaborative sessions with teachers and their representatives regarding the adoption and implementation of OAS and TLE. Several webinar series – on topics such as data collection, TLE, improving student writing, and adoption of the state’s science standards – have proved invaluable in increasing participation of educators in two-way communication since they are able to participate without accounting for any school leave required by drive time. As an example, a series of webinars regarding the TLE system solicited input about the use of the TLE (Section 3.B) in particular as it relates to the State’s new Differentiated Recognition, Accountability, and Support System (Section 2.A). Teachers and administrators were primarily concerned about and provided input into how the new TLE Evaluation System would impact the school’s A-F Grade (detailed in Section 2.A). The confusion expressed by educators about this issue in particular prompted a requested amendment to 2.A, submitted in 2013.
Surveys: Online as well as paper surveys provide an opportunity for teachers, administrators, and their representatives to provide input in a confidential manner. In March 2010, the SEA used an online survey to solicit input from teachers and the public about the CCSS. The SEA has chosen to leave this survey open for ongoing input; by November 2011, 273 teachers and 109 administrators had provided comments about the quality of the standards through this survey. In September 2011, the SEA used an online survey to solicit input from teachers and the public about the TLE. By November 2011, 806 teachers and 173 administrators had provided comments about the elements of a valuable evaluation system through this survey. On October 28, 2011, the SEA hosted a Community Engagement Forum to receive input on the ESEA Flexibility Request, including a focus group of teachers and their representatives. Participants completed paper surveys as part of the event (see Attachment 2A: Summary of Survey Results). Many of the suggestions from these surveys were included in the State’s plan for components of the accountability system (Section 2.A), recognitions for successful schools (Section 2.C), and interventions for unsuccessful schools (Sections 2.D, 2.E, and 2.F). Since November 2011, regular survey opportunities have been provided to LEAs, teachers, administrators, and their representatives. Several of these are directly identified and results summarized throughout this Extension Request.

Focus Groups and Advisory Committees: The SEA has several standing focus groups and advisory committees composed of teachers and administrators as well as some focus groups and advisory committees that have been replaced or updated over the course of implementation of the state’s education reform initiatives. These include Academic Advisory, now known as REAC3H Checkpoint, which includes curriculum directors and assistant superintendents from LEAs; Curriculum Consortium, a former collaborative of curriculum directors and administrators focused on implementation of state academic content standards and curriculum mapping processes; Content Area Consortia, composed of content experts, instructional facilitators, and district administrators; Title III Part A Consortium; and the Title I Committee of Practitioners, to name a few.

State Superintendent Janet Barresi has engaged in a comprehensive listening tour across the State since taking office in January 2011. The listening tour site visits are focused on in-depth engagement with teachers, administrators, students, and parents. Site visits have been extremely effective in gathering information about the full spectrum of viewpoints, from anxieties to aspirations and from best practices to innovative strategies. Many of the suggestions provided during this listening tour have been implemented in Oklahoma’s ESEA Flexibility Request.

The REAC3H Network was designed in 2011 to provide training, collaboration, and partnerships throughout the State to facilitate the implementation of statewide initiatives, including state academic content standards and the TLE. As will be discussed in Section 1.B, the SEA’s Offices of Instruction, Educator Effectiveness, and Assessment developed Toolkits for use by LEAs in implementing the state academic content standards and TLE. After release of the first toolkit, REAC3H Network leaders provided suggestions for improvement and volunteered to serve on a Toolkit Development Committee. This is just one example of how teachers and administrators are providing guidance for the reform initiatives in Oklahoma.

Focus groups of teachers and administrators from the original 70 REAC3H Network Leadership Districts provided direct support to the development of the State’s ESEA Flexibility Request. Leadership Districts sent a total of 22 teachers and their representatives to provide input during the Community Engagement Forum (see Attachment 2B: Summary of Public Input from Community Engagement Forum). In addition, administrators from the lead districts were invited to participate in ESEA Working Groups that met face-to-face and electronically throughout the development of the request. The underlying structures as well as many of the specifics in Sections 2.A, 2.B, 2.C, 2.D, 2.E, 2.F, and 2.G are a direct result of these ESEA Working Groups.

Since approval of Oklahoma’s ESEA Flexibility Request, ongoing conversations with educators through focus
groups and advisory committees have provided insight and understanding about implementation; consequences, both intended and unintended; planning; accountability; and revision of the request as well as state legislation and regulation reflected in the request.

Public Comments: Additional comments from LEAs and the public regarding the ESEA Flexibility Request are provided in Attachment 2C: Public Comments. These messages informed the final touches on the initial request in November 2011, with public comments from additional Amendments and this Extension Request also provided in the attachments section.

Key Take Away: The beliefs, suggestions, and innovations of Oklahoma teachers and administrators have shaped Oklahoma’s commitment to college- and career-ready expectations for all students (Principle 1), as well as accountability, recognition, and support systems for teachers, leaders, schools, and districts (Principles 2 and 3).

2. A description of how the SEA meaningfully engaged and solicited input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes.

As mentioned in the previous section, the SEA hosted a Community Engagement Forum on the ESEA Flexibility Request on October 28, 2011 (see Attachments 3A: Invitation to the Community Engagement Forum, 3B: Agenda of the Forum, and 3C: Notice to the Public). In addition to the teachers, administrators, and their representatives that attended the forum, 14 other community members attended, including one student, several parents, and several representatives from community-based organizations, businesses, and Indian tribes. As part of the event, the SEA asked the participants to comment on the major components of the request and to complete a survey, providing direct input into the development of the ESEA Flexibility Request (see Attachments 2A: Summary of Survey Results and 2B: Summary of Public Input from Community Engagement Forum).

Community members have also responded to the online surveys discussed in the last section. Between March 2010 and November 2011, the SEA received input from 14 individuals who were not employees of public school districts regarding the state academic content standards through an online survey. In the fall of 2011, the SEA received input from 150 students, parents, business owners, government employees, representatives of philanthropic organizations, and other community members regarding the TLE through an online survey.

As stated above, many of the suggestions made through comments and survey responses were included in the State’s plan for components of the accountability system (Section 2.A), recognitions for successful schools (Section 2.C), and interventions for unsuccessful schools (Sections 2.D, 2.E, and 2.F).

Because of the low response rate to the Community Engagement Forum and the online surveys, the SEA has continued to reach out to the community. Executive staff members of the SEA have met with legislators, parent organizations, business representatives, and organizations representing students with disabilities and English Learners. Town hall meetings, round tables, State Superintendent listening tours, and State Superintendent site/community visits are designed to learn about the partnerships in successful schools and the needs of communities in struggling schools.

These meetings have resulted in feedback that has informed the ongoing development of the ESEA
For example, the Oklahoma Foundation for Excellence has agreed to offer STEM grants and other professional development opportunities in Priority and Focus Schools. Upon approval of the Request, the SEA continued to engage all stakeholders and education partners to ensure that the initiatives included in this Request were and continue to be implemented with fidelity and result in transparent communication, easily interpreted accountability reports, and increased student achievement.

Further, the SEA has ongoing collaboration with several stakeholder committees and advisory groups such as the Oklahoma Business and Education Coalition, P-20 Data Council, legislator advisory groups, State Superintendent’s Student Advisory Council, IDEA-B Advisory Panel, Teacher and Leader Effectiveness Commission, State System of Institutions of Higher Education, State System of Career and Technology Education Centers, and Oklahoma Intertribal Council. The SEA has engaged these groups throughout the past several years to discuss the adoption and implementation of statewide reform initiatives, which include the Achieving Classroom Excellence Act (ACE, detailed in the Overview Section), OAS, and TLE. Much of the work of these groups over the past several years, particularly the work of the TLE Commission, has provided direct and indirect input into this ESEA Flexibility Request.

The SDE secured a grant for the purpose of introducing OAS. During the 2013-2014 school year, events called Road Rallies were held in various regions across the state to make parents, families, community members and other stakeholders aware of key concepts and strategies. Practical opportunities for parents to be engaged in the process (i.e. sign up for emails, volunteer, engage in social media, share the Standards with others, etc.) were made available.

Participants also received an “easy to understand” road map handout that clearly conveyed the objectives of OAS.

In order to facilitate this ongoing outreach to educational partners across the state and the country, the SEA has hired an Executive Director of Parent and Community Engagement. The primary responsibilities of the Executive Director of Parent and Community Engagement include connecting community-based resources with local school districts and identifying the education stakeholders on a state level that can support implementation of the state education reform initiatives.

Of great importance is the ongoing collaboration between the State Superintendent and the legislature in development of the State’s educational reform agenda. This policy work is detailed in the Overview Section as the foundation of reform for the State’s ESEA Flexibility Request.

Key Take Away: The reforms outlined in this ESEA Flexibility Request have widespread support of a variety of stakeholders, indicating that the reforms are likely to be implemented with fidelity and fervor across the State. The beliefs, suggestions, and innovations of Oklahoma community leaders have shaped Oklahoma’s commitment to college- and career-ready expectations for all students (Principle 1), as well as accountability, recognition, and support systems for teachers, leaders, schools, and districts (Principles 2 and 3).
The Department encourages an SEA that receives approval to implement the flexibility to collaborate with the Department to evaluate at least one program, practice, or strategy the SEA or its LEAs implement under principle 1, 2, or 3. Upon receipt of approval of the flexibility, an interested SEA will need to nominate for evaluation a program, practice, or strategy the SEA or its LEAs will implement under principles 1, 2, or 3. The Department will work with the SEA to determine the feasibility and design of the evaluation and, if it is determined to be feasible and appropriate, will fund and conduct the evaluation in partnership with the SEA, ensuring that the implementation of the chosen program, practice, or strategy is consistent with the evaluation design.

☒ Check here if you are interested in collaborating with the Department in this evaluation, if your request for the flexibility is approved.
Oklahoma in 2011 arrived at a challenging and promising crossroads for its educational system. The work that began in 2011 continues on in 2014 and will brighten the future of Oklahoma children.

The challenge: Results indicated that Oklahoma’s students had fallen behind in the global competition for excellence (one study ranked Oklahoma among the worst 10 states in producing top-achieving math students), while remediation numbers for high school graduates entering college remained high. The promise: In 2011, Oklahoma finally turned the corner toward positive transformation with a commitment to rethink our approach to education, to restructure outdated and inefficient systems, and to enact real reforms.

Oklahoma can be a leader in education, but only if we are committed to new fundamentals for the 21st Century – and to an unambiguous goal. Superintendent Barresi has issued a call for the State: By the year 2020, each student graduating from an Oklahoma high school must be college, career, and citizen ready.

Building on the success of a slate of reforms passed by the State Legislature and signed into law in recent years, Oklahoma will win the competition for excellence. This ESEA waiver package has provided Oklahoma with the flexibility it needed to press forward with implementation of reforms in the 2011-2012, 2012-2013, and 2013-2014 school years, while giving schools room to grow for the 2014-2015 school year and beyond.

Oklahoma's reforms are briefly summarized here:

Reforms Emphasizing Literacy, Accountability, & Choice - State Superintendent Barresi, Governor Fallin, and Oklahoma’s State Legislature advanced a bold package of legislation in the 2011 session, which included ending social promotion after the third grade for children who are not reading proficiently at grade level, the implementation of an A-F report card on individual school performance, and an expanded menu of educational choices for parents. These reforms have assisted with identifying struggling schools and students in need of additional supports.

Achieving Classroom Excellence (ACE) - The Senior Class of 2012 was the first full class of students that were required to demonstrate mastery in college and career preparatory courses in order to graduate. State end of instruction (EOI) tests, college entrance tests, workforce training preparedness tests, and advanced coursework validation exams, such as Advanced Placement and International Baccalaureate exams, serve as high school exit criteria. The SDE has successfully continued the important work involved in the ACE program, with over 96% of all seniors meeting the graduation requirements in 2012 and 2013.

Data Drives Decisions - The SEA has begun the process of developing a comprehensive, user-friendly, accessible, and robust longitudinal data system that will drive decision-making in classrooms, schools,
districts, and the SEA. The system will meet federal reporting requirements; provide data necessary to implement the Teacher and Leader Effectiveness Evaluation System; allow data from districts and sites, testing companies and other various sources to be gathered, analyzed and calculated for the A-F Grading System and other needs; create district access to student level data; create a dashboard for current projects and progress; and establish a student information system for PK-12 education across the state. Bringing useful and timely student-level data into the hands of educators will allow them to be more efficient in facilitating optimal learning and better support student outcomes from Pre-K through postsecondary education and into the workforce.

High-Quality Digital Learning - Oklahoma is working toward fully embracing the “Ten Elements of High-Quality Digital Learning” unveiled by the bipartisan Digital Learning Council in 2010 and expanded in 2011 with the 72-point “Roadmap for Reform”. This effort will include an expansion of the supports available to schools in order to address the unique professional development needs for educators in online and blended learning environments, as well as creating new expectations for the integration of digital tools in all Oklahoma classrooms. The SEA’s most recent work towards this goal includes collecting information on device and bandwidth usage and readiness. A speed test was conducted to understand and improve broadband and connectivity in Oklahoma Schools. This information will be helpful as districts and the SEA move forward to set goals and work with other organizations for funding.

Oklahoma Academic Standards (OAS) – Oklahoma adopted the Oklahoma Academic Standards, which included the Common Core State Standards (CCSS) in English language arts and mathematics until the 2014-2015 school year. Beginning with the 2014-2015 school year, districts will teach the state academic content standards for English language arts and mathematics that were in place prior to June 2010, which are anchored in what it takes to be ready for college and careers. Oklahoma districts have transitioned to more rigorous content standards by developing their own curricula in line with these standards. The State is on track for a full implementation of college- and career-ready standards with aligned assessments by 2014-2015.

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.

An Effective Teacher in Every Classroom; An Effective Leader in Every School - Oklahoma has developed a new Teacher and Leader Effectiveness Evaluation System (TLE). The TLE combines multiple measures of effectiveness to identify areas of professional growth so that each child has an effective teacher every year and each teacher has a team of effective leaders throughout his or her career. The TLE promises to support all teachers and administrators toward continuous improvement of instructional practices and student outcomes.

REACH Network - To implement its broad slate of reforms, to introduce TLE, and to assist schools with the transition to OAS, the SEA has also created an informational network called Regional Educators Advancing College, Career, and Citizen Readiness Higher (REACH). The REACH Network was organized to provide teachers and administrators with professional development by conducting Regionals in 10 sections of the state, as needed. Trainers included State Directors of each subject area for OAS, with special sessions for administrators.

Oklahoma’s reform movement, in short, is an empowerment agenda. We are empowering students by
preparing them to be successful and informed citizens in the real world of the 21st Century. We are
empowering parents by providing them with easy-to-understand information about schools, by utilizing data
to drive decisions, and by expanding choice. And we are empowering educators through reforms like our
new TLE system – encouraging teachers and administrators to reach their full potential.

Oklahoma’s *ESEA Flexibility Request* reflects the intersection of these reforms, diverse constituencies across
the State, and the four waiver principles. The time is urgent. Oklahoma can turn its crisis into an
opportunity. With the flexibility provided by this ESEA waiver package, the State can usher in this
transformation all the more rapidly.

**Key Take Away:** Oklahoma sets its reform agenda as the foundation for this *ESEA Flexibility Request*, and the State acknowledges that any relaxation of its commitment to
these reforms would risk denial of the ESEA waiver package.
PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS

1A ADOPT COLLEGE-AND CAREER-READY STANDARDS

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
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<tbody>
<tr>
<td>☐ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.</td>
<td>☒ The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.</td>
</tr>
<tr>
<td>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</td>
<td>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</td>
</tr>
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<td></td>
<td>ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)</td>
</tr>
</tbody>
</table>
1.B TRANSITION TO COLLEGE-AND CAREER-READY STANDARDS

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of the document titled ESEA Flexibility Review Guidance, or to explain why one or more of those activities is not necessary to its plan.

2014-2015 Update:
The Oklahoma State Board of Education has adopted the Oklahoma Academic Standards (OAS) for curriculum and instruction in many content areas. In 2010, the Common Core State Standards (CCSS) were adopted for English language arts and mathematics and were incorporated into OAS until the 2014-2015 school year. In July 2014, the Priority Academic Student Skills (PASS) for English language arts and mathematics that were in place prior to June 2010 were reinstated as the OAS for those two subject areas (see Attachment 4: State Board Minutes from July 23, 2014). The PASS for English language arts and mathematics have been verified by the Oklahoma State Regents for Higher Education (OSRHE) as being college and career ready. (see Attachment 5: PASS Standards Certification Letter from Chancellor Glen Johnson and Attachment 16: PASS Standards Report). As will be discussed in 1.C, the state standards will be measured by aligned, high-quality assessments in 2014-2015.

The PASS for English language arts and mathematics will be taught in Oklahoma school districts until new state standards and aligned assessments for these two content areas can be developed and implemented through a statewide collaborative process. The process for standards development is expected to occur throughout the 2014-2015 and 2015-2016 school years, with aligned assessments to follow shortly thereafter. The requirement for developing and adopting new college- and career-ready standards for English language arts and mathematics was set forth by House Bill 3399 of 2014, requiring collaborative declarations of college- and career-readiness by the Oklahoma State Board of Education, the Oklahoma State Regents for Higher Education, the Oklahoma State Board of Career and Technology Education, and the Oklahoma Department of Commerce. Additionally, the law requires input from students, parents, educators, organizations representing students with disabilities and English language learners, higher education representatives, career technology education representatives, subject matter experts, community-based organizations, Native American tribal representatives, and business community representatives.

As you can see, two separate processes exist in the State of Oklahoma with regard to state academic content standards in English language arts and mathematics:
1. The OSRHE has reviewed the PASS standards, that are now part of OAS, and determined them to be college- and career-ready standards.
2. The OSBE is leading a process to develop new standards that are college- and career-ready standards for future implementation.

Oklahoma requests an extension of the ESEA Flexibility for the 2014-2015 school year as originally requested (see Attachment 32: Letter from State Superintendent Janet Barresi to Secretary Duncan and Assistant Secretary Delisle Regarding Extension Dated August 8, 2014) because of this guarantee that the State has and will continue to have college- and career-ready standards.
Historical Commitment

Since 1991, Oklahoma has had a fully-defined set of standards, originally known as the Priority Academic Student Skills (PASS), for grades one through twelve in the core content areas of English language arts (ELA), mathematics, physical education, science, social studies, the arts, and world languages. Standards for pre-kindergarten and kindergarten in all content areas except world languages were added in 2002. Local curricula must meet the broad array of ambitious goals set forth in the Oklahoma Administrative Code:

The curriculum translates the school’s statement of philosophy (and/or mission) and goals into learning objectives and activities. The core curriculum shall be designed to teach competencies for which students shall be tested. The curriculum shall be designed to prepare all students for employment and/or post secondary education. The school shall use varied measures to determine the extent to which individual students are achieving the goals and levels of competencies. The instructional program is designed to impart the knowledge and skills essential to function successfully in a democratic society. (210:35-3-61, effective 5-17-91)

As this passage makes clear, Oklahoma had made the commitment of setting college-, career-, and citizen-ready standards for our students 20 years prior to the adoption of the current state standards. By law, the SEA must review and revise the state content standards at a minimum of every six years, which perfectly situated Oklahoma to be ready for adoption of the CCSS in mathematics and English language arts in June 2010. Upon release of the CCSS, the State Board of Education initiated the process for formal adoption of the standards. The adoption process included a timeline of implementation for all CCSS content standards to be taught in each LEA not later than the 2013-2014 school year with assessments of the standards originally intended to follow in the 2014-2015 school year.

The State Board of Education approved the SEA’s participation as a monitoring state in the development of the Next Generation Science Standards. 2014 Update: In monitoring the development of the Next Generation Science Standards, Oklahoma determined that it was more appropriate to develop standards specific to the State; therefore, the SEA convened a group of K-12 Oklahoma educators and science experts to revise the Oklahoma Academic Standards for Science (OAS-Science). These standards were formally adopted in the spring of 2014, allowing for a transition period for developing curriculum and instruction, with aligned assessments administered in the 2016-2017 school year.

The SEA was a member of the Social Studies Assessment, Curriculum, and Instruction collaborative, which was organized by the Council of Chief State School Officers (CCSSO) to develop state standards for social studies in partnership with the National Council for Social Studies and 14 other content organizations. 2014 Update: As changes were made to the consortium, Oklahoma determined that it was more appropriate to develop standards specific to the State; therefore, the SEA convened a group of Oklahoma educators and social studies experts to revise the Oklahoma Academic Standards for Social Studies in Fall/Winter 2011-2012. On March 29, 2012, the Oklahoma State Board of Education adopted the Social Studies standards. The Governor of Oklahoma signed them into law.

As host of the 2010 International Creativity Forum, the State understands that the promotion of multiple modes of thinking not only supports artistry, but develops problem-solving skills, engaged citizens, and entrepreneurship. The arts are a vital part of Oklahoma’s core curriculum. The SEA has sent a representative to participate in discussions of the State Education Agency Directors of Arts Education and the National Coalition for Core Arts Standards as the collaborative begins exploration of a multi-state fine arts framework. 2014 Update: Oklahoma Academic Standards for Fine Arts Standards were revised in the Spring of 2013 by a committee of Oklahoma educators and fine arts experts. The Oklahoma State Board of Education adopted the Fine Arts standards on July 25, 2013. The Fine Arts standards were codified
and signed by the Governor of Oklahoma in the Spring of 2014.

As our State implements the OAS, our generational commitment to the 1991 Administrative Code can serve as a legacy to remind us that college-, career-, and citizen-ready learning standards have long been at the core of what Oklahomans expect for their children.

**Raising the Rigor of State Academic Content Standards through the American Diploma Project and the Achieving Classroom Excellence Act of 2005 (as amended)**

Within the last ten years, Oklahoma’s standards reform efforts have intensified. In order to better understand why Oklahoma adopted OAS, as well as to appreciate the State’s commitment to the full implementation of college- and career-ready expectations for all students, a brief background of the State’s recent actions is helpful.

In 2002, the State’s education leaders – including the Oklahoma Business and Education Coalition (OBEC), the Oklahoma State Regents for Higher Education (Regents), the SEA, and the governor – invited Achieve, Inc. to review the PASS standards and assessments in ELA and mathematics, for the purpose of comparing them against the best standards from states across the United States and from other nations, as well as the ACT. As a result of the review, Achieve recommended that Oklahoma raise the rigor of its standards and assessments, and in response, Oklahoma moved to strengthen the PASS standards and the state assessments (http://www.achieve.org/node/276).

Two years later, Achieve released the American Diploma Project (ADP) College- and Career-Ready (CCR) Benchmarks and policy recommendations designed to ensure that all students acquire the knowledge and skills necessary to be prepared for success after high school.

In June 2005, the Oklahoma legislature adopted sweeping reforms through the Achieving Classroom Excellence Act (ACE) that reflected the college- and career-readiness goals of the ADP agenda. This landmark legislation established a set of courses as the default curriculum for high school graduation. The courses were designed to prepare all students for success in work and postsecondary education, beginning with students who entered ninth grade in 2006-2007 (anticipated graduating class of 2010). Four credits of English, three credits of mathematics, three credits of science with a laboratory component, three credits of social studies, two credits of a foreign language or computer science, and two credits of fine arts are included in the CCR courses. The mathematics requirements were designed so that students complete courses through at least the level of Algebra II.

During the same time period, Oklahoma’s education leaders joined Achieve’s American Diploma Project (ADP) network to collaborate with other states also working to implement the ADP college- and career-readiness agenda. Leaders across the country embraced the rigor of the “specific content and skills that graduates must have mastered by the time they leave high school if they expect to succeed in postsecondary education or in high-growth jobs” (http://www.achieve.org/node/604).

In February 2006, an Oklahoma team participated in the ADP Alignment Institute for English Language Arts (ELA) and Mathematics Benchmarks to build on the State’s earlier alignment work with Achieve and to provide a foundation of rigorous content for the new courses and assessments required under ACE. With minor adjustment to its ELA standards, Oklahoma received an Affirmation of Alignment of the ADP Benchmarks and Oklahoma’s standards from Achieve. An action plan for implementing the benchmarks was approved by the Oklahoma State Board of Education in March 2006. Additional changes
were made to the mathematics standards in 2007 to better reflect CCR expectations. The subsequent ADP Quality Final Review found both Oklahoma’s ELA and Mathematics standards to be well aligned to the ADP College and Career Readiness benchmarks.

In a 2008 report, “Out of Many, One; Toward Rigorous Common Core Standards From the Ground Up,” Achieve suggested that college- and career-ready standards in a significant number of states had converged to the point that common state standards were possible (http://www.achieve.org/commoncore). Within a year, 48 states and the District of Columbia agreed to work together to develop common college- and career-ready standards for English language arts and mathematics. Oklahoma served as a state reviewer of drafts of the new standards and adopted the final English language arts and mathematics standards in June 2010.

For more than a decade, Oklahoma has remained fully committed to raising the bar for all students to the college- and career-readiness level in English language arts and mathematics. In addition, Oklahoma has collaborated with other states to establish college and career readiness as the norm through the ADP Network and ACE.

Oklahoma Academic Standards Implementation

Transitioning to OAS has been a multi-year, multi-phased process. Oklahoma has used a variety of resources and supports to inform the development of its own multi-year implementation plan. Immediately upon adoption of the standards in 2010, the State’s four-year implementation plan was launched. In Oklahoma, “full implementation” was intended to include administration of assessments based on OAS in the 2014-2015 school year. Full implementation of curriculum and instruction aligned to the OAS was completed by June 2014, just as new legislation reintroduced the PASS for English language arts and mathematics as the OAS for the 2014-2015 school year.

The success of the OAS in Oklahoma depends on the effectiveness of this plan in bringing the following new expectations to the classroom level and in supporting all students as they prepare to graduate from high school college, career, and citizen ready:

- The initial efforts focused on getting the word out – communicating with key stakeholders and educating educators about what the standards are and how they build upon and raise the expectations established during the initial implementation of PASS.
- The second phase of implementation focused on aligning instructional materials and providing technical assistance/professional development to teachers so that they were able to teach the new standards to their students. Integrated into phase two was the transition to the state assessments that will measure student mastery of OAS.
- The third phase involves providing ongoing professional development and support, while aligning the State’s student information system and accountability system with the expectations contained in standards and measured by state assessments.
- The fourth phase focuses on strengthening relationships across education sectors to ensure that the full education system in Oklahoma is well aligned with OAS expectations embedded throughout. In addition, reinforcing implementation with technical assistance from each education sector will allow Oklahoma to accomplish more than if implementation were the sole
responsibility of the SEA.

- The fifth phase will be to measure and evaluate the State’s progress in delivering a rigorous and well-rounded education to all students. Students will enter kindergarten ready to learn, making progress and staying on track until they graduate college, career, and citizen ready.

**Phase One**
The first goal for the initial year of adoption (2010-2011) focused on educating key stakeholders, including PK-12 educators, Career and Technical educators, Higher Education faculty, and SEA leadership and staff about the new English language arts and mathematics standards and how they differ from previous expectations.

Following is a list of representative professional development efforts designed to create awareness and build consensus through presentations, meetings, videoconferences, and regional conferences:

- **July 2010 State Superintendent’s Leadership Conference presentations**: Two sessions at a conference of 1,500 attendees provided an overview of the standards and the implementation timeline. Audience: PK-12 superintendents, assistant superintendents, curriculum directors, federal programs directors, teacher leaders.

- **July 2010 State Superintendent’s Mathematics Academy “Working on Common Ground”**: Keynote presentations at two academies highlighted the shifts in mathematics instruction imminent with adoption of the standards. Audience: 600 PK-12 mathematics educators.

- **Fall 2010 Common Core State Standards videoconferences**: Overviews and frequently asked questions. Audience: PK-12 educators at ten regional videoconference centers.

- **December 2010 and August 2011 First-Year Superintendents training**: English language arts and mathematics standards overview sessions. Audience: 100 first-year superintendents.

- **Winter 2010 Oklahoma Regents for Higher Education Committee on Instruction presentation**: Overview and discussion with Deans of Arts and Sciences for Oklahoma comprehensive and regional two- and four-year colleges. Audience: 45 deans and assistant deans.

- **April 2011 Oklahoma State Department of Education all-employee training**: Overview and frequently asked questions. Audience: 250 agency employees.

- **June 2011 Oklahoma PASSages Regional Curriculum Conferences keynotes and CCSS strand**: Keynote addresses and dedicated CCSS classroom strategies breakout strand at each of six regional conferences. Audience: 1,000 PK-12 educators.


- **August 2011 State Superintendent’s Master Teachers Project Summer Institute**: Three-day summer institute for Title II commended program to build teacher leadership. Keynote and content-specific training for standards implementation; members return to districts to conduct study groups throughout school year. Audience: 120 Master Teacher members.

- **October 2011 Oklahoma CareerTech presentation**: Overview and frequently asked questions. Audience: 50 Career Technology Center superintendents, assistant superintendents, and professional development directors.

- **Ongoing from September 2010 Regular Agenda Updates Mathematics State Consortium and Language Arts State Consortium**: Monthly meetings for mathematics and ELA district leaders provide more current information on standards and allow for advisory input. Audience: 25 PK-12 curriculum specialists and directors.

**Phase Two**
The second goal for the initial year of adoption (2010-2011) focused on providing technical assistance to districts as they moved toward full implementation. Two important technical assistance initiatives were
launched in fall 2010 to support the work of standards implementation. (1) Both educator-led and independently-conducted alignment studies were directed by the SEA in order to assist LEAs in understanding the similarities and differences in PASS ELA and Mathematics standards and OAS ELA and mathematics standards. (2) A webpage was developed to house information and resources specific to the standards.

- **October 2010 PASS/CCSS Alignment Institute:** 200 mathematics and English language arts K-12 educators, as well as representatives from business, higher education, and the community met for two days to align the Oklahoma state PASS standards with the CCSS, using the alignment tool and protocol developed by Achieve. Results were posted on the SEA’s website and educators were notified through the SEA’s various listserves.

- **Surveys of Enacted Curriculum (SEC):** The SEA contracted with the Wisconsin Center for Education Research to conduct an alignment study of PASS with CCSS using the SEC model. The study gives LEAs information regarding the relative emphasis within each set of standards of particular concepts and skills, as well as the depth to which these concepts should be taught. The study results were linked to the SEA’s website [http://www.seconline.org](http://www.seconline.org).

- **OAS Webpage:** A page on the SEA’s website has been established to provide educators and other stakeholders with important information and technical assistance for implementing OAS. The page includes:
  - The English Language Arts and Mathematics Standards and Appendices;
  - Oklahoma adoption rules and implementation timeline information;
  - Presentations and videos for public use;
  - Multiple links to teacher, administrator, and parent resources for assistance in developing curriculum, improving classroom practice, and helping students at home; and
  - Templates and guiding questions for District 3-year Transition Plans, required for every Oklahoma district to develop and submit to local board of education. [http://ok.gov/sde/oklahoma-academic-standards](http://ok.gov/sde/oklahoma-academic-standards)

The SEA’s plans for providing the professional development required for such efforts to be successful are described in **Phase Three**.

**Phase Three**

**REAC3H Network:** To further reinforce the SEA’s relationship with the LEAs, Oklahoma launched the REAC3H Network in August 2011, comprising 70 volunteer districts throughout Oklahoma who agreed to serve as coordinating agents for professional development, capacity-building efforts, and feedback from parents and local community members. The REAC3H Network was originally designed to advance the transition to college- and career-ready standards on multiple fronts throughout the 2011-2014 timeframe to full implementation of OAS. To provide additional support to coordinating districts, the SEA integrated existing partnerships with the state system of Higher Education and the Career and Technical Education system into the REAC3H Network.

In 2011-2012 and 2012-2013, each REAC3H coordinating district served by doing the following:

- Developing a detailed regional plan for implementing new standards with assigned districts;
- Identifying a training timeline and delivery methods;
- Developing partnerships to coordinate a training network;
- Enlisting local higher education institutions and CareerTech to support REAC3H activities;
- Describing how capacity-building would look in area served;
- Hosting regular meetings based on SEA guidelines;
- Providing SEA-developed training on new standards and other related topics;
- Disseminating professional development (tools, resources, model curricula, etc.) to area districts;
- Collecting data on implementation effectiveness;
• Submitting annual report on REAC3H activities, participation, and implementation; and
• Defining other appropriate responsibilities.

The SEA was responsible for “leading the leaders.” Defined roles of SEA include the following:
• Organizing and hosting three network summits per year;
• Developing and delivering “train-the-trainers” professional development, via videoconferences and webinars;
• Developing and distributing professional toolkits for trainer and district use. Each toolkit to include suggested agenda, PowerPoint presentation, follow-up activities, and resources.
  Toolkit #1 Making the Case for the Common Core – an Overview
  Toolkit #2 Aligning School Curriculum to the Common Core
  Toolkit #3 Changing Instruction for the Common Core
  Toolkit #4 Developing Effective Teachers and Leaders for the Common Core
• Providing technical support;
• Seeking incentives for REAC3H Network coordinating districts, including grant opportunities and pilot programs; and
• Other services to be determined.

The REAC3H Network’s greatest asset was the synergy created through local ownership of professional development and instructional practice. Early feedback indicated that LEAs were designing systems of support for transitioning to OAS based on local needs.

2013-2014 Update: The REAC3H Network was incredibly beneficial in assisting educators with the transition to Oklahoma’s OAS and using data to inform instruction; however, in some areas of the state, coordinating districts were unable to provide services to other districts. In the interest of continually improving systems, the REAC3H Network was reorganized for the 2013-2014 school year. The umbrella of REAC3H continued to focus on communication and collaboration networks within the state with the intention of expanding to provide opportunities for educators of all types to connect with one another and critical information sources. The focus shifted from providing training to administrators only toward providing training to teachers as well. With the reorganization, fewer districts were identified as coordinating districts, and OSDE took on direct responsibility for providing training on OAS and other state initiatives in each of 10 regions, while using the coordinating districts (approximately 3 districts in each region) to support ongoing collaboration within each region.

In order to support this change in focus, the OSDE hired additional staff and reorganized the duties of existing staff to provide direct training to teachers. The new approach increased state contact with district personnel from three annual summits, open only to coordinating districts, to 21 regional training sessions available to all districts in addition to one annual summit for educators statewide. OSDE REAC3H Regional professional development sessions ensured all educators had a clear perspective on the instructional shifts associated with the OAS standards in ELA and mathematics. Additionally, instructional leadership, literacy, social studies, science, the arts, and world languages were represented with specific breakouts in regional sessions (See Attachment 17: REAC3H Regional Professional Development).

2014-2015 Update: The SEA Office of Instruction staff will continue to support the work of implementing OAS by providing the content for our statewide summer professional development conference and regional trainings as needed, and by working with external partners, higher education institutions, and cadres of educational leaders who provide training throughout the state.

State Longitudinal Data System (SLDS): This request outlines Oklahoma’s approach to accountability in support of OAS and college, career, and citizen readiness for all students, but it is worth stressing that
work is underway to enhance the SEA’s student information system. With a stronger data system linked with other education agencies, Oklahoma will be able to produce a complete picture of a student's progress from Pre-K through high school graduation and into college, training programs, and the workforce as the State implements the OAS and state assessments.

At the formation of the REAC3H Network in the fall of 2011, to support the drafting and implementation of Oklahoma’s first State Longitudinal Data System (SLDS) grant, the SDE formed an advisory committee of district superintendents and data leads from across the state. The purpose of the advisory committee is to engage with districts, learn their perspective on data and data systems, and align the SEA Office of Student Information priorities with district needs. The primary goal of the SEA Office of Student Information is to get timely, quality and actionable data into the hands of teachers and other local stakeholders who can help improve classroom learning and student outcomes. The second is to strengthen data collection and reporting in order to reduce local data burdens and expand the SEA’s ability to analyze data and evaluate programs. Ultimately, the SEA’s SLDS must support the agency’s mission to ensure that each student graduates college, career and citizen ready by 2020.

The complexity of issues before the district advisory committee has grown since its formation. In early 2013, the committee formed three workgroups to dig into specific data issues with the SEA: accountability data, data use, and data governance. The accountability data workgroup serves as a resource to the SEA around issues involving the processes, data and systems involved in the review, correction and certification of student level data used in the state’s A-F Report Card and other accountability projects. The data use workgroup districts and their local community partner organizations are piloting the SEA’s new Ed-Fi Dashboards (in development for use in the 2014-15 school year); the Ed-Fi Pilot includes an implementation strategy that will connect the SEA with teachers and other local personnel who will become the Ed-Fi’s main end-users. The data governance workgroup provides the district perspective on data-related matters, such as the availability, usability, integrity, and security of data. Each of these workgroups supply the growing number of LEA end-users who help guide the work of the SEA Office of Student Information.

Oklahoma’s SLDS grant projects are aimed at a wide array of stakeholders beyond local school personnel described in the paragraph above; stakeholders will include parents, students, the SEA itself, state policymakers and the general public. The SLDS Evaluation deliverable will gather input and – once the new SDLS web portal and analytical tools are completed – feedback related to not only the performance of the system, but also user acceptance and adoption.

**Phase Four**

**REAC3H Coaches:** To build on the success of the REAC3H Network, the SEA partnered with our state Career and Technical Education system and the state system of Higher Education to house REAC3H Coaches in each region of the State. The SEA hired 60 REAC3H Coaches as part of the statewide professional development plan outlined below to assist with implementation of literacy standards at the district, building, and classroom level. Coaches provided assistance on instructional strategies for teachers as well as instructional leadership for principals and district leaders. This assistance included specific training on instructional strategies designed for effectiveness in teaching ELs and students with disabilities. Taking a multi-perspective approach to learning across the State enabled the SEA to provide more robust and more permanent support to districts through the implementation process and beyond.

**Summer Convenings:** During the summer of 2013, convenings of Oklahoma educators were held. Nearly 90 Oklahoma educators worked for two weeks to develop resources for all levels of ELA and mathematics education. Products included assessment guidance, instructional resources, lesson plans, curriculum maps, pacing guides, and numerous resources that led to the development of ELAOKteachers.com and
OKMathTeachers.com. In 2014, additional convenings were held for ELA, mathematics, and science educators to again develop resources to support educators in their implementation of OAS.

**PD On Your Plan (PDOYP):** In 2013, Oklahoma used the Cross-State Learning Collaborative Affiliates grant to catapult PDOYP from thought phase to full implementation. PDOYP delivers research-based strategies for effective instruction through a variety of web-based technologies. PDOYP provides professional learning experiences – often referred to as professional development (PD) – in a format that teachers and administrators can access conveniently during their planning periods, team meetings, before or after school, or even from home.

Bringing together staff from multiple offices at the SEA, classroom teachers, administrators, curriculum experts, higher education faculty, and other stakeholders, PDOYP explores best practices for improving the effectiveness of educators as they implement OAS and other statewide initiatives. PDOYP models authentic blended learning for educators, providing material for cooperative learning among both on-site and virtual professional learning communities. PDOYP breaks the mold of traditional professional development, overcoming site and district barriers such as geography, communication, department size, and available resources. (See Attachment 30: PD On Your Plan.)

**Phase Five**

The SEA has committed to the goal of graduating each student from an Oklahoma high school **college, career, and citizen ready** by 2020 (C3). To reach this goal, the SEA itself must think anew about how it operates and provides supports to the LEAs and classroom teachers. To help develop a systematic approach that supports the C3 goal, the SEA contracted with the U.S. Education Delivery Institute to help the department transform from being a compliance organization into a service organization, capable of providing the level and type of timely assistance schools need to teach its students at the level required by OAS and as measured by state assessments. The SEA has built an Office of Policy Implementation to ensure that the department successfully makes this transition and provides the supports required for OAS implementation as reflected in improved outcomes for students – including ultimately graduating college, career, and citizen ready.

The goals of the SEA require close alignment of data collections, student performance, and policy. The set of data indicators required for the A-F School Grading System, Teacher and Leader Effectiveness, and local decision making will refine the P20 vision for Oklahoma and define the short and long term goals for the SLDS. The data systems within the SEA and across P20 education agencies must meet these needs, but in turn the efficiencies achieved by coordinating and synching of indicators across these needs will reinforce these reforms while clarifying accountability for districts, schools, teachers, parents, students, legislators, the business community, the media, and all those interested in the success of PK-12 students in Oklahoma specifically against OAS and state assessments, but also more generally in their success after they graduate from high school as they continue their education and training, and as they begin their careers.

**Key Milestones**

The following page includes a timeline for statewide professional development to support the full implementation of OAS, Oklahoma’s college- and career-ready (CCR) standards. In the timeline, funding was once listed as a significant obstacle. SEA leadership revised professional development budgets and realigned professional development priorities to ensure that the most critical activities received necessary funding. The five activities listed in the timeline – Hiring REACH Coaches; Facilitating Collaboration...
between Higher Education Faculty and PK-12 Educators; Facilitating Collaboration between Career and Technical Educators, Business Representatives, and PK-12 Educators; Strengthening Support to Teachers through REACH; and PD On Your Plan – are the top professional development priorities for the State in terms of implementation of OAS.
<table>
<thead>
<tr>
<th>Key Milestone or Activity</th>
<th>Detailed Timeline</th>
<th>Party or Parties Responsible</th>
<th>Resources (e.g., staff time, additional funding)</th>
<th>Significant Obstacles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hire REAC3H Coaches to Provide Professional Development for OAS Literacy Implementation across the State</td>
<td>First hired in 2012</td>
<td>Executive Director of Literacy</td>
<td>Funding for coaches’ salaries</td>
<td></td>
</tr>
<tr>
<td>Facilitate Collaboration Between Higher Education Faculty and PK-12 Educators around College Readiness Expectations</td>
<td>Beginning May 2012</td>
<td>Assistant State Superintendent, Office of Educator Effectiveness</td>
<td>Staff Time</td>
<td>Travel, Substitute, and Stipend Costs</td>
</tr>
<tr>
<td>Facilitate Collaboration Between Career and Technical Educators, Business Representatives, and PK-12 Educators around Career Readiness Expectations</td>
<td>Beginning May 2012</td>
<td>Assistant State Superintendent, Office of Educator Effectiveness</td>
<td>Staff Time</td>
<td>Travel, Substitute, and Stipend Costs</td>
</tr>
<tr>
<td>Strengthening Support to Teachers through REAC3H</td>
<td>Reorganization: July 2013</td>
<td>Director of District OutREAC3H</td>
<td>Staff Time</td>
<td>Funding</td>
</tr>
<tr>
<td></td>
<td>Assistant State Superintendent, Office of Policy Implementation</td>
<td></td>
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<td></td>
<td>SEA Staff</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>PD on Your Plan</td>
<td>Pilot: 2013-2014</td>
<td>Assistant State Superintendent, Office of Instruction</td>
<td>Staff Time</td>
<td>Availability of Technology in LEAs</td>
</tr>
</tbody>
</table>
Increasing Access to College and Career Preparatory Courses

Since 2005, Oklahoma has funded up to six credit hours per semester of dual or concurrent enrollment for high school seniors who meet academic requirements. In 2009, the Oklahoma state legislature mandated that LEAs award either academic or elective high school credit, as appropriate, for concurrent courses in order to meet graduation requirements.

Oklahoma schools offer Advanced Placement (AP) and International Baccalaureate (IB) programs. Schools have annually increased AP participation and scores of 3, 4, and 5 for all students and for traditionally underserved subgroups of students. In order to improve the chances of success in AP, IB, and advanced coursework for traditionally underserved subgroups of students, the SEA's Office of Instruction promotes the growth of Advancement Via Individual Determination (AVID) programs by building awareness, arranging training, and supporting an AVID page on the SEA website.

In order to expand opportunities for students to take advanced courses in small and rural schools, the Oklahoma legislature mandated that LEAs offer supplemental online courses for students beginning in the 2011-2012 school year. Additionally, Oklahoma plans to become a leader in digital learning opportunities for students at all grade levels, including virtual school for PK-12, by fully embracing the 72-point “Roadmap for Reform” developed by the Digital Learning Council.

For decades, Oklahoma has been known as a leader in Career and Technical Education (CTE). The State’s CTE system (CareerTech) offers career-training programs as well as academies designed to prepare students for high-level college programs focused in Science, Technology, Engineering, and Mathematics (STEM) careers. These academies include Biomedical, Aerospace, Pre-Engineering, and Biotechnology. Many of the academies and course programs offered through the CTE system allow students to earn high school and college credit while obtaining a career certification.

Addressing the Success of English Learners, Students with Disabilities, and Low-Achieving Students

Oklahoma requires that all students are provided an education that will enable them to be college, career, and citizen ready upon graduation from high school. Oklahoma currently assists English Learners (ELs), students with disabilities, and low-achieving students by offering research-based remedial or developmental programs, as well as programs designed to accelerate student learning, implemented by an effective teacher. Additionally, a counselor is available in all schools to help with motivation, social skills, study skills, goal setting, and any mental health issues that might arise. Programs are designed to connect curriculum, instruction, and assessments that are parallel to the academic goals for all students. Multiple professional development opportunities are provided to assist with training of administrators, teachers, and counselors.

Oklahoma’s State Personnel Development Grant (OK SPDG) is promoting a multi-tiered system of academic and behavior support (a blended model of Positive Behavioral Interventions and Supports [PBIS] and Response to Intervention [RtI]), which provides a framework for using child-specific data to identify and address specific academic and behavior needs of all students. It is a framework developed to address areas of weakness that needs to be addressed through specific interventions. This framework is also used with our RSA Early Literacy initiatives.

English Learners: Oklahoma’s goal is to ensure that English Learners and immigrant children and youth meet the same challenging state academic content and student academic achievement standards as all other children. The foundation of Oklahoma’s program rests upon the World-Class Instructional Design and
Assessment (WIDA) English Language Development (ELD) Standards, which have recently been aligned to the CCSS. The WIDA ELD Standards, an augmentation of the WIDA English Language Proficiency (ELP) Standards, outline uniform underlying cognitive functions and grade-level topical vocabulary across the levels of language proficiency. WIDA’s Grade Level CAN DO Descriptors serve as a companion piece to the WIDA ELD Standards. The Grade Level CAN DO Descriptors are a standards-based resource tool, outlining expectations for ELs for each of the language domains and each of the five levels of English language proficiency. Both the WIDA ELD Standards and the Grade Level CAN DO Descriptors are essential components of Oklahoma’s Professional Development Plan for administrators, counselors, content area teachers, paraprofessionals, and English as a Second Language (ESL) or bilingual education specialists. These tools assist all educators in differentiating, scaffolding, and accelerating instruction for ELs.

Because accelerating the learning of ELs and immigrant students and closing the achievement gap is an Oklahoma priority, Oklahoma developed the Language Instruction Educational Plan (LIEP) and recommends this plan to be completed by a team consisting of the ESL specialist and content area teacher(s) for each EL student in Oklahoma. Beginning with school year 2012-2013, all Priority Schools, Focus Schools, and Targeted Intervention Schools with low achievement among their EL students must complete the LIEP for each student that qualifies for EL status that has demonstrated low achievement. Updated yearly and shared with the parent, a complete LIEP contains ELP placement test data, ACCESS for ELs Test data, state testing data, program placement information, and individual language learning goals tied to the WIDA ELD Standards and the CAN DO Descriptors. In addition to an annual update, the LIEP team will perform quarterly evaluations of each student’s progress in meeting outlined language development goals. The LIEP will serve as the companion piece to the LEA’s Language Instruction Program Delivery Plan (also known as the LEA’s Lau Plan) designed by staff and stakeholders.

The SEA plans to implement two acceleration strategies in schools across the state: (1) Advancement Via Individual Determination (AVID). AVID provides support that is often beneficial to EL students and works with them and their families to prepare them for success in college and careers. Part of that preparation includes their enrollment in Pre-Advanced Placement (Pre-AP) classes in middle school and high school as well as Advanced Placement (AP) classes during high school. (2) Native Speakers Classes. Because proficiency in one’s native language will increase proficiency in English, schools with high Hispanic student populations will be targeted to expand or create Spanish for Native Speakers classes that will lead into AP Spanish Language and AP Spanish Literature classes. Similarly, other Native Speakers classes will be encouraged across the state, including Cherokee, Vietnamese, Hmong, and Chinese (Mandarin).

Professional development for all educators of ELs and immigrant students is the next essential component of Oklahoma’s program. The SEA has designed a professional development plan broken down by topic and month. Professional development is made available regionally to all educators. Most recently, the SEA has begun offering an EL Data Digging Workshop, which assists LEAs in goal setting, program design, and data analysis. In addition to group workshops, professional development is also offered through webinars, peer-to-peer chats, Delicious, Twitter, Edmodo, videoconferences, and on-site technical assistance. Currently, all Title III schools are required to offer on-site, high-quality, research-based professional development related to the teaching and learning of English Learners and annually report to the SEA the number of professional development offerings and attendees. Beginning with the 2012-2013 school year, each Priority School, Focus School, and Targeted Intervention School with low achievement among its EL students will have to offer professional development in the following areas: interventions for language learners, identification and exit criteria, connection of data to program services, and accelerated learning.

A Language Instruction Program Delivery Plan should be developed by each LEAs with ELs; it is required of LEAs with at least one Priority School, Focus School, or Targeted Intervention School that has low achievement among its EL students. LEAs must establish a team for the purpose of conducting a district
needs assessment to gain input from all stakeholders, including staff, parents, and community members. The LEA’s district needs assessment informs the design of the Language Instruction Program Delivery Plan, which is evaluated on an annual basis. The Language Instruction Program Delivery Plan includes the following areas: interventions for language learners, identification and exit criteria, connection of data to program services, and accelerated learning.

**Students with Disabilities:** Accelerating learning of students with disabilities and closing the achievement gap is an Oklahoma priority. The SEA is working with LEAs to accelerate student learning experiences so that all students with disabilities, including those who participate in the Oklahoma Alternate Assessment Program (OAAP), are able to meet the expectations of the Oklahoma Academic Standards, which include Essential Elements. The SEA’s Office of Special Education Services will promote systems change in the content and delivery of professional development for educators and parents directed at ensuring better academic and social outcomes for all Oklahoma’s students with disabilities.

The SEA has undergone restructuring of personnel and programs that will integrate special education initiatives into the current transition plan for OAS. All programs outlined for the transition of OAS will have a representative from the SEA Office of Special Education Services to ensure that students with disabilities have access to accelerated programs and opportunities to decrease the achievement gaps. The collaboration between offices within the SEA will provide opportunities to deliver essential training to LEAs and schools that will decrease the achievement gap in all subgroups.

Students with disabilities are expected to be taught in the least restrictive environment and to have access to the same curriculum as all other students. The SEA monitors implementation of the federal requirements included in the Individuals with Disabilities Education Act (IDEA). As a result of the monitoring, each district is provided a district data profile that identifies how they are performing with regard to each of the indicators outlined in Oklahoma’s State Performance Plan. The information from the district data profiles provide valuable information to assist in making decisions on assessment, instruction, graduation, and dropout rates. Access to this type of data will provide the SEA and LEA the opportunity to develop programs and provide targeted professional development to assist educators in decreasing the achievement gap.

The SEA provides training and support to educators and parents in developing Individualized Education Programs (IEPs) based on grade level standards to improve student outcomes. The SEA has launched an online option for LEAs to submit IEPs for statewide, district, and site data analysis. This will assist in further data analysis of student IEP goals, the environments in which students receive instruction, accommodations and modifications, types of assessment, and assessment results. This will assist educators in understanding patterns of students who take the general assessments and alternate assessments and in providing transitional interventions that will lead students toward higher achievement on state assessments and alternate assessments in the future. Supports, personnel, accommodations, and modifications are used in general and special education classes, along with differentiated instruction, to provide access to the curriculum for all students. Additionally, an accommodation manual specific to Oklahoma assists district personnel in selecting appropriate accommodations to be utilized for student assessments. The SEA provides resources, training, and professional development from national experts to ensure educators have the tools needed to assist with this population. The SEA partners with outside agencies to support access to the curriculum, even for students with the most significant cognitive disabilities. Annual professional development is offered to all educators in areas such as collaborative teaching, accommodations, and Universal Design for Learning (UDL).

Oklahoma has implemented an alternate assessment based on alternate achievement standards for students with significant cognitive disabilities. Educators are also provided a criteria checklist for the identification of the appropriate assessment. Oklahoma is updating guidance documents and training materials to provide suggestions and activities aligned to OAS. Oklahoma is also participating in the Dynamic Learning Maps
(DLM), a consortium funded to assist states in developing assessments in English language arts and mathematics for students with the most significant cognitive disabilities.

**Low Achieving Students:** Although the OK SPDG’s main goal is to improve academic and social outcomes for students with disabilities, the grant will provide educators with tools and supports to assist all students who need interventions for academics and/or behaviors in accessing the curriculum. The grant will also assist in implementing statewide initiatives for early literacy and implementation of OAS.

Oklahoma was a pioneer in the creation of a statewide system to serve low-achieving students through the creation of its Statewide Alternative Education Academy System. Currently, Oklahoma invests more than $14.8 million annually to support 240 Alternative Education Academies serving approximately 10,000 students in Grades 6-12. In partnership with the University of Oklahoma, the SEA has implemented the K20alt project to deliver high-quality professional development through the design of model lessons, as well as teacher coaching, and an online professional learning community. Activities are specifically focused on areas of weakness for low-achieving students, as well as instructional strategies aligned with OAS.

The SEA’s Parent and Community Engagement team oversees implementation of 21st Century Community Learning Centers Grants and, previously, Learn and Serve America Grants. Both programs are designed to support children in reaching high levels of curriculum expectations through well-rounded approaches to education, including community service, arts in education, enrichment, and content connections to real world experiences. Both grant programs are supporting implementation of OAS in local schools.

All LEAs are currently required to set aside a minimum of 1 percent, up to a maximum of 5 percent, of their Title I, Part A funds in order to specifically serve students who are identified as homeless. To help support the academic needs of homeless students, schools can provide additional tutoring and supplemental educational materials as well as pay for class and testing fees. Tutoring supports will assist homeless students in accessing and achieving OAS.

In light of OAS and the future of computer-based General Educational Development (GED) testing, the SEA’s Adult Education Team aligned adult education standards to OAS in English language arts and mathematics, the integration of more technology-based curriculum, and professional development opportunities focused on teacher effectiveness. In July 2014, the Adult Education Team transferred to the Oklahoma Department of Career and Technology Education in order to streamline the supports available to adult learners, seeking basic education skills as well as career development skills.

**Third Grade Reading:** Oklahoma has screened all kindergarten, first, second, and third grade students for indicators of being at risk of reading below grade level since 1998. Funding appropriated for interventions and remediation of identified first through third grade students has been set at up to $180 per pupil for programs during the school year and up to $400 per pupil for third grade summer reading academies. Students unable to read at third grade level after summer academy remediation could be recommended for retention.

In 2011, new legislation passed requiring that Oklahoma students entering first grade in school year 2011-2012 be retained if they are reading below grade level on the state reading assessment by the end of their third grade year, effective 2013-14. All K-3 students identified as being at risk of reading below grade level, as determined by one of the State approved formative reading assessments, will be placed on an academic progress plan of reading improvement. Students will receive individualized remediation and intensive interventions designed to help them achieve reading proficiency as described in OAS. All districts will provide identified students with reading initiative interventions, including, but not limited to, in-school and after-school differentiated instruction, Saturday school, and summer school. Students who are identified for
retention in the 2013-2014 school year will be provided an accelerated reading program intended to remediate the student during an altered instructional day. The law provides for “good cause” exemptions in certain instances, but the intention of the legislation and the SEA’s subsequent guidance is to end social promotion for students who are not achieving at acceptable levels in reading, as described in OAS. Professional development in the use of scientifically based reading research (SBRR) strategies is now an allowable expenditure of Reading Sufficiency funds, and funding for kindergarten interventions will be proposed in the 2012 legislative session.

Teacher and Principal Preparation Programs

The Oklahoma State Regents for Higher Education (Regents) has partnered with the SEA to coordinate efforts between the PK-12 system and institutions of higher education across the State. This partnership focuses on expectations for students entering college as well as for graduates from teacher and principal preparation programs. The relationships developed have enhanced educator preparation with discussions about OAS, TLE, and other state education initiatives.

The Oklahoma Commission for Teacher Preparation (OCTP) oversees educator preparation programs and teacher and leader certification examinations. The Commission is working diligently with all colleges of education to understand and implement reforms necessary to align with OAS.

The SEA representative to the Oklahoma Association of Colleges of Teacher Education (OACTE) provides regular information to the Association members and receives feedback from the members regarding implementation strategies. Additional training for the OACTE members, who are deans or directors of Oklahoma’s teacher and administrator preparation programs, related to implementation of OAS in English language arts and mathematics was provided on January 13, 2012. At this meeting, the Association members discussed how the new standards would impact their work and how they would ensure that all new teachers would be able to teach curriculum aligned to more rigorous standards. In addition, they discussed how colleges of education would support practicing teachers and administrators through ongoing professional development related to OAS.

The SEA provides leadership and guidance to support teachers- and principals-in-training as well as in their entry years. The SEA conducts principal academies for new principals as well as principals in Priority, Targeted Intervention, and Focus Schools; conducts first-year superintendent training; and provides leadership coaches to principals in struggling schools. Through the 60 REAC3H Coaches and the former program known as the State Superintendent's Master Teachers Project, the SEA developed teacher leaders in all regions of the State focused on implementation of the standards, with an emphasis on literacy. The REAC3H Coaches modeled lessons for and facilitated collaboration between educators in all regions of the state.

Recently, the SEA partnered with OCTP and the Regents to develop standards, curriculum, and certification tests for Elementary Math Specialists that target implementation of the math standards in elementary schools and for Gifted Education that target implementation of strategies to accelerate and differentiate learning experiences for gifted and talented students.

In 2013, the SEA established a role within the Office of Educator Effectiveness to serve as liaison between the SEA and institutions of higher education as well as between the SEA and Career and Technology Centers. This role has further enhanced the ongoing relationship between agencies and institutions and increased consistency and alignment of goals.
Transition of State Assessments to Align with College- and Career-Ready Expectations

The SEA’s Office of Accountability and Assessments, under the direction of the State Board of Education and the State’s ACE legislation, has addressed raising the rigor of our assessments. For grades 3-8 Math and Reading, the performance standards (or cut scores) were reviewed and the rigor increased in June of 2009. Comparisons were made between the proficient cut scores on the National Assessment of Educational Progress (NAEP) and the State’s previous cut score, so that committees of teachers could begin closing the gap between what had been expected of students previously and how students scored on the sampling of the NAEP test. These standards settings resulted in significantly raising the rigor of the tests, which caused a drop in the level of student proficiency by as much as 15%-29% on each assessment.

In accordance with the State’s ACE legislation, our seven end-of-instruction tests (EOIs) were reviewed, realigned, and recalibrated with a three-year phase-in of rigorous cut scores. Algebra I was the first to begin this process in 2007; followed by English III, Algebra II, and Geometry in 2008; and finally, English II, Biology I, and U.S. History in 2010. The rigor of the EOIs was addressed through item development, and the cut scores were set with rigorous expectations during performance standard setting. CCR standards were addressed during these performance standards setting sessions, and a study was conducted to compare our students’ scores on these tests and on the ACT. The Algebra II EOI, which is the math EOI that is most closely linked with college readiness, had a proficiency rate of 54% in its first year; after 3 years, the proficiency rate has increased to 66%, indicating that students are now mastering higher-level mathematics in alignment with state Algebra II content standards and assessments.

In 2011-2012, the State began transitioning our Oklahoma Core Curriculum Tests (OCCT) to bridge to more rigorous state assessments. Grades 3-8 mathematics and reading assessments included five field test items per subject aligned to the OAS, which included one constructed response item on each reading form. The State also moved Grade 7 mathematics and reading tests online in spring 2012 and then added Grade 6 mathematics and reading online in spring 2013. These four tests were added to an already successful online delivery of Oklahoma’s seven End-of-Instruction tests, Grade 7 geography, and Grade 8 mathematics and reading. These computer-delivered tests present tremendous opportunities to develop innovative assessment items that allow students to demonstrate their abilities more fully. These items enable students to show how they arrived at an answer, and the items allow scoring with a range of possible point values, rather than simply scoring answers as only right or wrong. In spring 2012, Grades 5 and 8 participated in a field test writing prompt linked to a passage and aligned to the writing standards of the OAS.

Beginning in 2012, Oklahoma offered educator item writing workshops facilitated by our testing vendor. This two-day workshop helped administrators, curriculum directors, and other instructional leaders explore the implications the OAS have on English language arts and mathematics content and curriculum as well as classroom instruction and assessment. Participants were led through item writing exercises linked to the OAS. The State also developed an accessible, academically-sound educator item bank and OAS-aligned benchmark assessments to support instruction and development of OAS skills. The bank provides opportunities for students to practice and engage in OAS-aligned Grades 3-8 and high school English language arts and mathematics performance tasks. Teachers have the opportunity to learn how to score and provide feedback according to the new standards.

Likewise, the State implemented the same field testing of OAS-aligned items with our online End-of-Instruction tests in Algebra I, Algebra II, Geometry, English II, and English III beginning in 2012-2013, in anticipation of more rigorous state assessments in the 2014-2015 school year.
Further, Oklahoma is a participant in the WIDA Enhanced Assessment Grant. This grant will build a comprehensive and balanced technology-based assessment system for ELs. The assessment system will be anchored in WIDA's ELD Standards that are aligned with the OAS, informed by rigorous, ongoing research, and supported by comprehensive professional development and outreach. WIDA will maintain its consortium approach to decision-making about the design and direction of the project and will involve the expertise of partners such as the Center for Applied Linguistics, UCLA, WestEd, Data Recognition Corporation, and MetriTech, Inc. The system will include a summative test, an on-demand diagnostic (screener) test, classroom benchmark assessments, and formative assessment resources.

**Key Take Away for Section 1.B:** Oklahoma knows that college-, career-, and citizen-ready (C3) expectations must be set for all students; that all students must be given access and supports in order to achieve C3 expectations; and that high-quality assessments must measure each student’s progress toward meeting C3 expectations. Oklahoma is committed to full implementation of college and career ready standards through OAS, college and career ready assessments, and an array of student supports, especially for those students who traditionally are underserved in advanced courses and college and career preparatory programs.
Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐ The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition.</td>
<td>☐ The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered 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.</td>
<td>√ The SEA has developed and begun annually administering 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.</td>
</tr>
<tr>
<td>i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)</td>
<td>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.</td>
<td>i. Attach evidence that the 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)</td>
</tr>
</tbody>
</table>
As a part of its regular practice, Oklahoma’s SEA commissioned independent studies to measure the alignment of Priority Academic Student Skills (PASS) standards and objectives to the grades 3-8 Oklahoma Core Curriculum Tests (OCCT) and the high school OCCT-End of Instruction (EOI) assessments.

Attachment 7 includes the following documentation in support of this claim:

7A: Comments from Oklahoma’s Technical Advisory Committee
7B: June 30, 2006, letter from USDE approving Oklahoma’s assessment system
7C: January 15, 2009, letter from USDE updating Oklahoma’s status on some NCLB cornerstones, including Oklahoma’s assessment system
7D: Webb Alignment Study – December 2011
7E: WestEd Alignment Study – June 2010

Dr. Norman Webb completed the grades 3-8 OCCT alignment study of Reading, Mathematics and Science in December of 2011. WestEd completed the high school EOI alignment study in June of 2010. Both groups used the Webb Alignment Process, which is one of the three common methods of performing independent alignment studies. This process was developed by Norman Webb from the University of Wisconsin and provides a reliable set of procedures and criteria for conducting alignment analysis studies, which combine qualitative expert judgments and quantified coding and analysis of standards and assessments. The product of the analysis is a set of statistics for each standard and grade on the degree of intersection, or alignment, between the content embedded in state content standards and the content in state assessments. The Webb model has been used in alignment studies in many states for more than a decade.

Following the training process, four to six reviewers, including teachers and content specialists, individually identify the content standard objectives that match each assessment item. They first determine the ‘depth of knowledge’ required by each objective or benchmark of the content standards being analyzed, and code each using one of four levels of knowledge: (a) recall, (b) skill/concept, (c) strategic thinking, (d) extended thinking. Operational definitions and labels vary somewhat by subject. Second, reviewers determine the objective or benchmark represented by each item or task on the state assessment being reviewed, and they rate the level of knowledge necessary for a student to successfully complete the item or task. The results for each reviewer are entered into a spreadsheet by tracking the corresponding objectives for each item and if the level of knowledge of the item is below, at, or above the level of knowledge of the corresponding objective. The content ratings and codes are statistically analyzed across the reviewers to produce statistics and tabular reports on four criteria of alignment for each standard: 1) categorical concurrence, 2) depth-of-knowledge consistency, 3) range of knowledge correspondence, and 4) balance of representation.

These alignment studies are point-in-time documents that provided the SEA with information on where the assessments were well aligned with the standards and identifying areas where the alignment between the assessments and the standards could be improved.

Findings:

Dr. Webb’s preliminary report for the grades 3-8 OCCT concludes, “Overall, the alignment relationship for all studies was strong to very strong and clearly demonstrates that the OCCT assessments were aligned well to the respective Oklahoma PASS standards and objectives” (page 4).

WestEd’s alignment findings taken from the Executive Summary for the EOI assessment alignment study
are quoted below.

**Mathematics**

The Algebra I and Algebra II tests met all criteria for all standards. The Geometry test met all criteria for all standards except in Depth-of-Knowledge Consistency, which was not met for Standard 1.

**English**

The English II test met all criteria for all standards except in Categorical Concurrence, which was not met for Standard 10.4, in Depth-of-Knowledge Consistency, which was weakly met for Standard 10.3, and in Balance of Representation, which was weakly met for Standard 10.2. The English III test met all criteria for all standards except in Range of Knowledge, which was not met for Standards 11.1 and 11.4.

**Science**

The Biology I test met all criteria for all content standards except in Depth-of-Knowledge Consistency, which was weakly met for Standards B.2, B.3, and B.4. The Biology I test met all criteria for all process standards except in Depth-of-Knowledge Consistency, which was weakly met for Standard PS.4, and not met for Standard PS.5.

Following receipt of each of the alignment studies, the SEA worked with its assessment vendors and the technical advisory committee to systematically review and address the findings of the studies by implementing thoughtful and appropriate adjustments to the assessments.
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 across the State;
- Student growth measures;
- Opportunities to earn bonus points by demonstrating success in College, Career, and Citizen readiness indicators, such as AP and IB participation and performance, performance on the SAT and ACT, completion of Algebra I at the 8th Grade level, and student performance on national industry certification tests; and
- Performance in core content areas (math, reading, science, social studies, and writing).

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 (and revised in 2013 and 2014), the Oklahoma legislature adopted an A-F School Grading System to hold all schools 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 current 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:
- Fifty percent (50%) on student test scores, including achievement on all criterion-referenced tests and end-of-instruction tests administered in the State;
- Twenty-five percent (25%) on student learning gains in reading and mathematics as measured by criterion-referenced tests and the Algebra I and English II end-of-instruction tests;
- Twenty-five percent (25%) on improvement of the lowest twenty-fifth percentile of students in the school in reading and mathematics on the criterion-referenced tests and the Algebra I and English II end-of-instruction tests; and
- Up to ten (10) bonus points on whole school achievement, which shall include:
  - For schools comprised of high school grades:
    a. The four-year adjusted cohort graduation rate of the school,
    b. 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,
    c. Postsecondary readiness of students as measured by the SAT or the ACT,
    d. The four-year adjusted cohort graduation rate of students who scored at Limited Knowledge or Unsatisfactory on the eighth-grade criterion-referenced tests in reading and mathematics,
    e. The percentage of students completing the State’s college and career preparatory curriculum (as measured by successful completion of at least six end-of-instruction tests), and
    f. The year-to-year growth in three of the five previous components;
  - For schools comprised of middle school grades:
    a. The attendance rate of the school,
    b. The drop-out rate of the school,
    c. The participation of students in honors, pre-Advanced Placement, or high school level courses (for example, 8th Grade students successfully completing Algebra I and scoring Proficient or Advanced on the Algebra I End of Instruction test);
  - For schools comprised of elementary school grades:
    a. The attendance rate of the school.

Timeline for Development of A-F School Grading System: Administrative rules were written and adopted by the Oklahoma State Board of Education 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 Oklahoma Legislature and Governor approved these rules in spring 2012, making them final. When 70 O.S. § 1210.545 was amended in the Summer of 2013, emergency rules were written and adopted by the State Board of Education to implement the changes required by the amendment for the 2013 report card. The process to implement permanent rules followed immediately thereafter. Oklahoma followed the legal process to incorporate the amendment into Oklahoma’s Formal Rules. The timeline for completing implementation of the most recent permanent rules is below.

<table>
<thead>
<tr>
<th>ACTIVITY</th>
<th>DATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rule Impact Statement Filing</td>
<td>October 15, 2013</td>
</tr>
<tr>
<td>Publication in Oklahoma Register</td>
<td>October 15, 2013</td>
</tr>
<tr>
<td>Draft of Rules Released for Public Comment</td>
<td>October 15, 2013</td>
</tr>
<tr>
<td>Public Hearing</td>
<td>November 18, 2013</td>
</tr>
<tr>
<td>Approval by Oklahoma State Board of Education</td>
<td>December 19, 2013</td>
</tr>
<tr>
<td>Approval by Oklahoma Legislature and Governor</td>
<td>Submitted for approval on December 19, 2013</td>
</tr>
</tbody>
</table>
The SEA explored best practices and consulted with state legislators, teachers, administrators, educator associations, interested organizations, and other states that have implemented A-F School Grading Systems, or comparable differentiated accountability systems, throughout the process of developing rules appropriate to Oklahoma. In addition, the SEA ran preliminary simulations of various aspects of the A-F School Grading System data to assess potential impact.

The rules adopted by the Oklahoma State Board of Education for the State’s A-F School Grading System on December 19, 2013 can be found in Attachment 19. These rules include details for implementation of the components listed in law.

Please note that these rules do not necessarily apply to other components of the waiver request, such as the State’s AMOs, which are overviewed later in this section and described in detail in Section 2.B.

Details that can be found in Attachment 19 include:

- For Component 1: Student Achievement (50% of overall grade)
  - Includes all Oklahoma State Testing Program (OSTP) exams administered during the most recent school year: Oklahoma Core Curriculum Tests (OCCT), End-of-Instructions Exams (EOI), and Oklahoma Alternate Assessment Program (OAAP) and
  - There must be at least ten (10) valid test scores from ten (10) unique students before a performance index is reported.
  - All students are included in the Performance Component except:
    a. “Second Opportunity EOI Test Takers,”
    b. Students not designated as “Full Academic Year (FAY),” and
    c. Students identified as “Other Placement” (Other Placement: A student placed by state or court order in a facility within a district other than the student’s original district of residence, or a student placed in a healthcare facility in a district other than the student’s original district of residence).
  - Middle school students (i.e., grades 6 – 8) who take EOIs will be included for both the middle school they are enrolled in for the current year’s report card and for their future high school the year they enroll in 9th grade.
  - The Performance Index Formula is:
    Number of Proficient or Advanced scores ÷ Total Number of Valid Scores = Performance Index.
    - The school receives a Performance Letter Grade based on the performance index:
      a. 90 or above = “A”
      b. 80-89 = “B”
      c. 70-79 = “C”
      d. 60-69 = “D”
      e. below 60 = “F”

- For Component 2: Student Growth (50% of overall grade),
  - Growth is divided into two sub-components:
    a. All students in a school worth twenty-five percent (25%) of the final grade and
    b. The bottom twenty-five percent of students in a school worth twenty-five percent (25%) of the final grade.
  - It includes OSTP Reading and Math exams only (Grades 3-8 OCCT/ OAAP Reading and Mathematics, Algebra I EOI/ OAAP, and English II EOI/ OAAP).
- Students identified in Component 1 are paired with a previous test score to evaluate growth.
- Scores are paired with similar versions of the exam. For example, an alternate exam (OAAP) to another alternate exam (OAAP), not an alternate exam (OAAP) to a general exam (OCCT).
- A Point is awarded if a student meets one of the following criteria:
  a. The student has a performance level of “proficient” or “advanced” on both exams.
  b. The student improves at least one performance level from the previous test score to the current test score.
  c. The student increases his or her scale score (OPI score) on the current exam compared to the prior exam. The increase must be greater than or equal to the average increase for the state on that specific exam.
- The Overall Student Growth Index Formula is:
  Points ÷ Total Number of Exams = Growth Index.
- The school receives an Overall Growth Letter Grade based on the Overall Student Growth Index:
  a. 90 or above = “A”
  b. 80-89 = “B”
  c. 70-79 = “C”
  d. 60-69 = “D”
  e. below 60 = “F”
- The Bottom 25% Percent Growth sub-component is calculated in the same way as the Overall Student Growth sub-component using the bottom 25% of students (based on the previous test score) identified in the Overall Student Growth sub-component.

* For the Bonus Points Component (up to 10 extra bonus points)
  - Schools are identified as Elementary if the highest grade served is 6th Grade or lower, Middle School/Junior High if the highest grade served is 7th Grade - 10th Grade, and High School if the highest grade served is 11th Grade - 12th Grade.
  - Each individual bonus category is all-or-nothing
  - Elementary Bonus Points
    a. Elementary sites earn all of their bonus points through attendance.
  - Middle School/Junior High Bonus Points
    a. Attendance accounts for 60% of the total bonus points available.
    b. Dropout rate accounts for 20% of the total bonus points available.
    c. Advanced coursework* (i.e., honors, Pre-AP, and high school level classes) accounts for 20% of the total bonus points available.
  - High School Bonus Points
    a. The four-year adjusted cohort graduation rate accounts for 50% of the total bonus points available.
    b. Participation or performance in advanced coursework* (i.e. Advanced Placement (AP), International Baccalaureate (IB), Advanced International Certificate of Education (AICE), concurrent college enrollment, and industry certification courses) accounts for 10% of the total bonus points available.
    c. College entrance exam participation or performance (ACT or SAT) accounts for 10% of the total bonus points available.
    d. The four-year adjusted cohort graduation rate of low achieving eighth grade students accounts for 10% of the total bonus points available.
    e. The percentage of graduates who pass 6 out of 7 EOIs accounts for 10% of the
f. Year-to-year growth in three out of the five previous categories accounts for 10% of the total bonus points available.

(*) Since advanced coursework is included in Oklahoma’s A-F School Grading System, the SEA is working with districts to provide greater access to advanced coursework at all levels. Examples of the strategies and activities that are being utilized include the following:

a. Requiring all LEAs to offer supplemental online courses (such as AP courses that the school cannot afford to offer because of low participation rates);
b. Encouraging LEAs to offer full-time virtual programming when educationally appropriate;
c. Requiring all LEAs to offer College and Career Ready Curriculum Course Offerings;
d. Encouraging LEAs to offer College and Career Ready Curriculum Course Offerings to middle school students for high school credit;
e. Requiring LEAs to give high school credit to any middle school student who completes a high school level course; and
f. Encouraging the expansion of AP/IB course offerings, supporting College Board’s equity and access policies, providing more professional development for AP and Pre-AP teachers, and encouraging the use of AVID and other programs that support students to complete advanced coursework.

- If a school does not test 95% of eligible students enrolled, the school’s overall letter grade will be reduced by one whole letter grade. For example, if a school gets an “A” in every area but only tested 94% of the students, the overall letter grade of “A” will be reduced to a “B”. Schools assessing less than ninety percent (90%) of eligible students will result in the school earning an overall letter grade of F.

- The formula for the Final Report Card Index is:

\[(\text{Student Performance Index} \times .5) + (\text{Overall Student Growth Index} \times .25) + (\text{Bottom 25\% Growth Index} \times .25) + (\text{Bonus Points}) = \text{Final Report Card Index.}\]

- The school receives a Final Letter Grade based on the Final Index:

  a. 97 and above = “A+”
  b. 93 – 96 = “A”
  c. 90 – 92 = “A-“
  d. 87 – 89 = “B+”
  e. 83 – 86 = “B”
  f. 80 – 82 = “B-“
  g. 77 – 79 = “C+”
  h. 73 – 76 = “C”
  i. 70 – 72 = “C-“
  j. 67 – 69 = “D+”
  k. 63 – 66 = “D”
  l. 60 – 62 = “D-“
  m. 59 and below = “F”

The A-F Report Card Technical Manual is available as Attachment 20. This comprehensive document explains in detail how each aspect of the report card is calculated, including:

- How schools will receive credit for graduation rate based on a four-year adjusted cohort rate;
- How results from all assessments administered in the State will be incorporated 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 bonus point factors (such as graduation rate) will be calculated to ensure that the outcome of the A-F School Grading System will result in improved instructional practices and options for students.

The four-year adjusted cohort graduation rate will comprise 50% of the Bonus Point Component of the report card that is allocated to measures other than current-year test scores in schools designated as high schools. Furthermore, high schools can earn an additional 10% of their bonus point allotment by ensuring that low performing eighth graders graduate in four years. Thus, on-time graduation accounts for a total of 60% of the Bonus Point component for high schools and is an important focus of the A-F School Grading System.

Dropouts are included as 20% of the Bonus Point Component of the report card for middle schools that is allocated to measures other than test scores. Sites will lose points for students who drop out of school. As the four-year adjusted cohort graduation rate already incorporates dropouts for high schools, dropouts are only included as a unique component for middle report cards.

The Final Letter Grade for each school 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.

(†) Since the four-year adjusted cohort graduation rate is included in the A-F School Grading System as a bonus point component, Oklahoma has determined to incorporate an additional accountability trigger related to graduation rate for both Priority and Targeted Intervention designations as well as incentives and supports to all Title I schools (Sections 2.D and 2.F).

Recognitions and Interventions

As opposed to the Accountability System that was 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 C³ 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 C³ expectations (Section 2.D);
- Schools with achievement gaps or graduation rate gaps between subgroups of students will be required to implement interventions focused on the needs of those subgroups while pushing for
higher C³ expectations among the highest performing students (Section 2.E);

- Schools with low achievement or below acceptable graduation rates 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: C³ by 2020 (Sections 2.F and 2.G).

**Identification of Reward, Priority, Focus, and Targeted Intervention Schools**

**Using the A-F School Grading System**

Initial identification in 2011 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, and Targeted Intervention Schools will be based on the State’s A-F School Grading System as explained in Sections 2.C, 2.D, and 2.F; however, additional schools may be named as Reward and Priority schools in order to ensure that the definitions provided by USDE are met as explained below. Focus schools will be determined based on the methodologies described in Section 2.E and will not be based on the State’s A-F School Grading System in future years. See Attachment 21 for a visual representation of these classifications.

**Reward Schools:** Schools that receive a School Grade of A (including A+ and A-) will be identified as Reward Schools unless they are also identified as Priority or Focus schools. In addition, any school that would be identified as a High-Performing or High-Progress Reward School using the same methodology outlined for 2011 but using the most current data available will also be named as a Reward School, unless they are also identified as a Priority or Focus school.

**Priority Schools:** Schools that receive a School Grade of F will be identified as Priority Schools. SIG Schools (Category 3) and high schools with a graduation rate below 60% for three consecutive years, using the most current data available (Category 2), will be identified as Priority Schools. Beginning in 2014, any school with a graduation rate of 50% or less in any given year will be identified as a Priority School. If the number of Title I schools that are identified as Priority Schools via these methods is not equal to or greater than 5% of the total number of Title I schools, any school that would be identified as a Priority School using the same methodologies outlined for 2011 (Category 1) but using the most current data available will also be named as a Priority School, as needed to meet the minimum number of identified schools.

**Targeted Intervention Schools:** Schools that receive a School Grade of D (including D+ and D-) and high schools that have a graduate rate of 50%-60% in any given year that have not already been identified as Priority, Focus, or Reward Schools will be identified as Targeted Intervention Schools.

**Focus Schools:** Schools that are not identified as Priority 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 be named as a Focus School.
Comparison of Students Served by Former (Adequate Yearly Progress) and New (A-F School Grading) Accountability System

The intention of Oklahoma’s ESEA Flexibility Request is to meet the needs of more students under the new A-F School Grading Accountability System than were previously served using the former AYP Accountability System. Under the former accountability system, Oklahoma had a uniform minimum N-size of 30 for All Students and each student subgroup beginning in 2008. Schools that did not make AYP in particular subgroups were identified for School Improvement, Corrective Action, or Restructuring, if the school had at least 30 students in that particular subgroup. Schools focused their attention on serving students in these subgroup populations, sometimes to the detriment of struggling students that were not in low-performing subgroups. Schools with less than 30 students in a subgroup were not held accountable for making AYP. Based on data from the 2010-2011 school year, schools that were identified for School Improvement, Corrective Action, or Restructuring in 2011 had student enrollments in subgroups for which the school was identified as shown in the table below. Comparatively, under the A-F School Grading System, implemented in the 2012-2013 school year (using data from the 2011-2012 year), ALL SCHOOLS were held accountable for reading and mathematics performance of the bottom 25% of students, regardless of the students’ race, ethnicity, socio-economic status, or any other subgroup criteria as long as the school had at least 30 valid test scores, which could be as few as 15 students. The combining of these subgroups to consider all students in the bottom 25% will hold schools accountable for more students since they will not have to meet the threshold (N=30) for each subgroup. The number of students in tested grades in the bottom 25% of students for the 2011-2012 school year is provided in the table below.

<table>
<thead>
<tr>
<th>Subgroup</th>
<th>Adequate Yearly Progress (Tested Grades)</th>
<th>Bottom 25% of Students in A-F School Grading (Tested Grades)</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td>11,978 (39.8%)</td>
<td>28,225 (40.6%)</td>
</tr>
<tr>
<td>Hispanic</td>
<td>7,309 (24.3%)</td>
<td>12,484 (17.9%)</td>
</tr>
<tr>
<td>Multiple Races</td>
<td>128 (0.4%)</td>
<td>3,728 (5.4%)</td>
</tr>
<tr>
<td>Asian/Pacific Islander</td>
<td>0 (0.0%)</td>
<td>893 (1.3%)</td>
</tr>
<tr>
<td>Black</td>
<td>5,776 (19.2%)</td>
<td>11,272 (16.2%)</td>
</tr>
<tr>
<td>American Indian</td>
<td>4,869 (16.2%)</td>
<td>12,989 (18.7%)</td>
</tr>
<tr>
<td>IEP</td>
<td>8,864 (29.5%)</td>
<td>12,559 (18.0%)</td>
</tr>
<tr>
<td>English Language Learner</td>
<td>5,167 (17.2%)</td>
<td>7,922 (11.4%)</td>
</tr>
<tr>
<td>Migrant</td>
<td>0 (0.0%)</td>
<td>108 (0.2%)</td>
</tr>
<tr>
<td>Economically Disadvantaged</td>
<td>24,349 (81.0%)</td>
<td>49,671 (75.8%)</td>
</tr>
<tr>
<td>TOTAL STUDENTS*</td>
<td>30,060</td>
<td>69,591</td>
</tr>
</tbody>
</table>

*Please note that each student can be included in multiple subgroups.

With the amendment to the A – F Grading System in 2013, the minimum required sample size was reduced to ten (10) unique students, resulting in an even greater number of students in each subgroup being accounted for in the bottom 25%.
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 (C3); 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.

<table>
<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.</td>
<td>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:</td>
</tr>
<tr>
<td></td>
<td>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</td>
</tr>
<tr>
<td></td>
<td>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.</td>
</tr>
</tbody>
</table>

At the time of submission of the initial ESEA Flexibility Request, the State’s newly adopted A-F School Grading System had not been implemented. Implementation began with the 2012-2013 school year (using data from the 2011-2012 school year); therefore, initial identifications of Reward, Priority, and Focus Schools were based on the methodology described in Sections 2.C, 2.D, and 2.E. Identification of Reward and Priority Schools in subsequent years is based on the A-F School Grading System as explained at the end of each section. In addition, any school that would be identified as a Reward, Priority, or Focus School using the same methodologies outlined for 2011 but using the most current data available will also be named in future years, if necessary. Moreover, Oklahoma will be identifying additional schools for Targeted Intervention as described in 2.F both for initial identification and in subsequent years.

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 High Performance Reward Schools, with reading and mathematics assessments weighted more heavily as discussed in Section 2.C, and the State will use results from assessments in reading and mathematics to identify High Progress Reward Schools 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 and Priority Schools beginning in the 2012-2013 school year as described in Sections 2.C and 2.D. Results from each of the content areas assessed through the Oklahoma School Testing Program (OSTP), including the OCCT, EOI, and OAAP assessments, 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 (C3). 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]). Forty percent (40.3%) of students with disabilities take the general mathematics state assessments, Oklahoma Core Curriculum Tests and End of Instruction Tests. Thirty-four percent (34.5%) of students with disabilities take the general reading state assessments, Oklahoma Core Curriculum Tests and End of Instruction Tests. 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

Results for the “all students” group for the State from the 2010-2011 School Year are listed below.

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<th># Tested</th>
<th>Combined Percent Proficient</th>
<th># Advanced</th>
<th>% Advanced</th>
<th># Proficient/Satisfactory</th>
<th>% Proficient/Satisfactory</th>
<th># Limited Knowledge</th>
<th>% Limited Knowledge</th>
<th># Unsatisfactory</th>
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<td># Limited Knowledge</td>
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<td>9%</td>
<td>315</td>
<td>69%</td>
<td>74</td>
<td>16%</td>
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<td>40,657</td>
<td>7,455</td>
<td>18%</td>
<td>29,052</td>
<td>71%</td>
<td>3,154</td>
<td>8%</td>
<td>996</td>
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<td>531</td>
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<td>2,370</td>
<td>79%</td>
<td>70</td>
<td>2%</td>
<td>26</td>
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</tr>
<tr>
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<td>81</td>
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<td>240</td>
<td>54%</td>
<td>103</td>
<td>23%</td>
<td>21</td>
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<td>58%</td>
<td>9,609</td>
<td>22%</td>
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<td>OAAP</td>
<td>454</td>
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<td>236</td>
<td>52%</td>
<td>79</td>
<td>17%</td>
<td>22</td>
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<td>TOTAL</td>
<td>44,031</td>
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<td>14%</td>
<td>25,300</td>
<td>57%</td>
<td>9,688</td>
<td>22%</td>
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<td>18,312</td>
<td>48%</td>
<td>5,274</td>
<td>14%</td>
<td>2,287</td>
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<td>4,389</td>
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<td>42%</td>
<td>2,261</td>
<td>52%</td>
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<td>6%</td>
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<td>0%</td>
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<td>632</td>
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<td>49%</td>
<td>119</td>
<td>19%</td>
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<td>43,381</td>
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<td>41%</td>
<td>5,871</td>
<td>19%</td>
<td>4,626</td>
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<td>OAAP</td>
<td>54</td>
<td>9</td>
<td>17%</td>
<td>19</td>
<td>35%</td>
<td>15</td>
<td>28%</td>
<td>11</td>
<td>20%</td>
</tr>
<tr>
<td></td>
<td>TOTAL</td>
<td>30,990</td>
<td>7,900</td>
<td>25%</td>
<td>12,567</td>
<td>41%</td>
<td>5,886</td>
<td>19%</td>
<td>4,637</td>
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<td>44%</td>
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<tr>
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<td>OMAAP</td>
<td>3,835</td>
<td>1,463</td>
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<td>1,367</td>
<td>36%</td>
<td>946</td>
<td>25%</td>
<td>59</td>
<td>2%</td>
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<tr>
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<td>OAAP</td>
<td>541</td>
<td>55</td>
<td>10%</td>
<td>333</td>
<td>62%</td>
<td>116</td>
<td>21%</td>
<td>37</td>
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<td>17,846</td>
<td>43%</td>
<td>6,349</td>
<td>15%</td>
<td>2,530</td>
<td>6%</td>
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</table>
### 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**

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.

**Option B**

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.

**Option C**

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 three major components: a Mathematics Index (including Participation Index), a Reading Index (including 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, including Participation Index
- Reading Index, including Participation Index
- Graduation Index

Elementary, Middle School, and K-8 District AMOs will consist of the following factors:

- Mathematics Index, including Participation Index
- Reading Index, including Participation Index
- Attendance Index

Definitions

**FAY:** Oklahoma currently defines students as Full Academic Year (FAY) if they are enrolled on October 1 and do not have an enrollment lapse of ten or more consecutive days between October 1 and the time of testing. Students are included in the performance calculations if they are FAY students. Students are included in the growth calculations if they are FAY students for the current school year. The students do not need to be FAY students at the site or LEA during the previous school year to be included in the growth measures.

**Assessments for Students with Disabilities:** The results of the Oklahoma Alternate Assessment Program (OAAP) and the Oklahoma Core Curriculum Tests (OCCT) are combined and included in the calculation of the Annual Measurable Objectives (AMO’s), and in the identification of the Priority Schools, the Focus Schools, the Targeted Intervention Schools, and the Reward Schools. The use of the performance levels in the calculations for each accountability system allowed for the results of all three tests to be used together. Therefore, the scores of Special Education students who take the alternate assessment (OAAP) are included in the accountability system calculations. As a result, all of Oklahoma’s students are reflected in the AMOs and the identification of Priority, Focus, Targeted Intervention and Reward schools. Note: Oklahoma will continue to use all current processes for determining what percentage of all students tested can count as proficient based on results from the OAAP, including the general rule as defined in the Accountability Workbook that only 1% of all students assessed may count as proficient on the OAAP. As explained in Oklahoma’s approved Accountability Workbook, the 1% will be made at a district level and applied proportionally to all schools within the district.

**Mathematics Index:** The Mathematics Index is calculated based on a weighted scale of proficiency status. 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. Only Full Academic Year (FAY) students are included in the computation of the Index. The Mathematics Index is calculated for Grades 3-8 Mathematics OCCT or OAAP and Algebra I OCCT or OAAP assessment. The points for each student are averaged and converted to a standardized score ranging from 20 to 80 points using the following formula:

\[
20 + (\text{Averaged Points} - 1) \times 30 + .49
\]
Reading Index: In a similar manner as the Mathematics Index, the Reading Index is calculated based on a weighted scale of proficiency status based on a weighted scale of proficiency status. Students receive 3 points for achieving Advanced, 3 points for achieving Proficient, 2 points for achieving Limited Knowledge, and 1 point for achieving Unsatisfactory. Only Full Academic Year (FAY) students are included in the computation of the Index. The Reading Index is calculated for Grades 3-8 Reading OCCT or OAAP and English II EOI or OAAP assessment. The points for each student are averaged and converted to a standardized score ranging from 20 to 80 points using the following formula:

\[ 20 + (\text{Averaged Points} - 1) \times 30 + .49 \]

The ‘.49’ ensures that the standardized score is always rounded up to the next integer. (See Attachment 31: AMO Information.)

Participation Index: The Participation Index is calculated as a ratio of students who took the OCCT/EOI or OAAP over the number of students enrolled during the time of testing. The calculation will be done separately for reading assessment participation and mathematics assessment participation.

Graduation Index: The Graduation Index is currently calculated using an approximated four year adjusted cohort graduation rate (by retroactively assigning students to a cohort based on the best estimate of when they first entered the 9th grade. Beginning in 2015-2016, the State’s longitudinal data system will be able to calculate the graduation rate using student level data where the cohort year is assigned upon initial entry to an Oklahoma high school (as opposed to a retroactive assignment). The definition of the four-year adjusted cohort rate is as follows:

“The four-year adjusted cohort graduation rate is defined as the number of students who graduate in four years with a regular high school diploma divided by the number of students who form the adjusted cohort for that graduating class” (i.e., entered high school four years earlier, adjusting for transfers in and out, émigrés and deceased students).

Criteria for AMOs

Each AMO will be applied to the achievement of the “all students” group and each of following subgroups when there are 10 or more students in the group: ELL Students, IEP Students, Regular Education Students, Black Students, American Indian Students, Hispanic Students, Asian Students, White Students, Multiple Race Students, and Economically Disadvantaged Students. (See Attachment 31: AMO Information.)

Mathematics AMO: Districts or sites will achieve the Mathematics AMO if they receive a Mathematics Index score of 70 or greater, or if they increase their score by at least 15% of the difference between their previous year’s score and 80. They must also meet the Mathematics Participation Index of 95% or above.

Reading AMO: Districts or sites will achieve the Reading AMO if they receive a Reading Index score of 70 or greater, or if they increase their score by at least 15% of the difference between their previous year’s
score and 80. They must also meet the Reading Participation Index of 95% or above.

**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, 84% 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 (C3). 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.

Oklahoma has chosen Option C of the ESEA Waiver for setting new AMOs. The criteria for meeting the proposed AMOs requires LEAS and school sites to meet or exceed the criteria set in Options A and B of the ESEA Waiver. To obtain a score of 70, the site or LEA must have almost all students and students in each subgroup both at proficient or advanced levels. Option A requires SEAs to reduce by half the percentage of students in the “all” category and in each subgroup not proficient in six years. The Oklahoma AMOs requires nearly all students and students in each subgroup to be proficient each year. Option B requires annual increases in students reaching the proficient level until all students reach proficiency by 2019-20. The Oklahoma AMOs requires nearly all students to obtain proficiency or improvement each year. Oklahoma’s AMOs definitely meet the intention and the criteria set forth in Options A and B. Attachment 29 provides the impact data for the proposed criteria based on simulations using 2010-2011 and 2011-2012 data. Attachment 31 includes the impact data for the proposed criteria based on 2012-2013 data.

**Reporting AMOs**

Each LEA and site will receive a report card that includes the LEA or site’s A-F School Letter Grade. In addition, each LEA and site will receive an AMO report. A sample of the AMO report is found on the next two pages. Please note that Oklahoma’s Test Score Reports provide the percent of student who score at each proficiency level at each LEA and the site. The percent of students scoring proficient is easily found on the score reports for all students and by student subgroups. LEAs can use these reports as well as the AMO reports to determine how well students are performing.

**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.

Sample Annual Measureable Objectives Report

<table>
<thead>
<tr>
<th>MATH AMO DETAILS</th>
<th>Student Group</th>
<th>Performance Scale Score</th>
<th>Percent Tested</th>
<th>Math Improvement Index</th>
<th>AMO Met</th>
</tr>
</thead>
<tbody>
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<td>Regular Education</td>
<td>73</td>
<td>100</td>
<td>71</td>
<td>Met</td>
<td></td>
</tr>
<tr>
<td>ELL</td>
<td>70</td>
<td>100</td>
<td>59</td>
<td>Met</td>
<td></td>
</tr>
<tr>
<td>IEP</td>
<td>*</td>
<td>*</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>All Students</td>
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<td>100</td>
<td>67</td>
<td>Met</td>
<td></td>
</tr>
<tr>
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<td>*</td>
<td>*</td>
<td>N/A</td>
<td>N/A</td>
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</tr>
<tr>
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<tr>
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<td>58</td>
<td>Met</td>
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</tr>
<tr>
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<td>N/A</td>
<td></td>
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<tr>
<td>White</td>
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<td>20</td>
<td>Met</td>
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<tr>
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<td>*</td>
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<td>N/A</td>
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<tr>
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<td>67</td>
<td>Met</td>
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</tr>
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<td></td>
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</tr>
<tr>
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<th>AMO Met</th>
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<td>*</td>
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<td>N/A</td>
<td></td>
</tr>
<tr>
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<td>100</td>
<td>67</td>
<td>Met</td>
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<tr>
<td>Disadvantaged</td>
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<td></td>
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<tr>
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<tr>
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<tr>
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<th>Graduation Rate AMO Met</th>
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<td>N/A</td>
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<tr>
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<td>N/A</td>
<td>N/A</td>
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<tr>
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<td>N/A</td>
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<tr>
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<td>-----</td>
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<tr>
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</tr>
<tr>
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<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Disadvantaged</td>
<td>*</td>
<td>*</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Male</td>
<td>84</td>
<td>27.00</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Female</td>
<td>96</td>
<td>49.00</td>
<td>N/A</td>
<td></td>
</tr>
<tr>
<td>Migrant</td>
<td>*</td>
<td>*</td>
<td>*</td>
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</tbody>
</table>

**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 the original ESEA Flexibility Request, the State’s newly adopted A-F School Grading System had not been implemented. Implementation began with the 2012-2013 school year; therefore, initial identification of Reward Schools was based on the methodology described below. Identification of Reward Schools in subsequent years is based on the A-F School Grading System as well as the following methodologies as explained at the end of this section.

Initial Year (In 2011): In order to identify schools as highest-performing 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 all students, including students with disabilities and English Learners, administered during the 2010-2011 school year and prior school years as identified below. In order to identify schools as high-progress Reward Schools, the State will include scores on the most recent administrations as well as prior administrations of the state assessments in reading, mathematics, Algebra I, and English II for all students.

High Performance (See Table 2, Key A): Schools are ranked using the results from all OSTP assessments from the previous three years (e.g., for 2013 designation, schools would be ranked on their 2010-2011, 2011-2012, and 2012-2013 test results). The criteria for inclusion in the ranking is identical to the criteria for the A-F Report Card (e.g., students must have been enrolled in the school for the Full Academic Year, been a first time test taker, etc.). Points are assigned to each assessment with a valid score based on the following scale:

- Advanced =4 points
- Proficient= 3 points
- Limited Knowledge = 2 points
- Unsatisfactory = 1 point.

Performance levels are subject to the federally mandated 1% OAAP (and prior to the 2013-2014 year, the 2% OMAP) proficiency caps. These points are summed within three categories (i.e., 3-8 Math and Algebra I, 3-8 Reading and English II, Everything Else) and divided by the number of valid tests within that category to create an index for each category. An average of the indices will be created via the following weights:

- 3-8 Math and Algebra I= 30%
- 3-8 Reading and English II= 30%
- Everything Else= 40%
- If there are only indices for the first two categories, each are weighted at 50%.
- If only ‘3-8 Math and Algebra I’ or ‘3-8 Reading and English II’ has an index, that index will be weighted at 60%.

Schools are ranked separately according to their C3 grade level classification (i.e., PK – 8 school, Elementary School, Middle School, and High School). Any school that scores at or above the 90th percentile within their classification on the final weighted index for each of the three years will qualify as a High Performance Reward School. Beginning in 2013-2014, the minimum n-size to calculate a weighted...
index will be 10 unique students.
To ensure compliance with the *ESEA Flexibility* definition of Reward Schools, schools in the top 10% (i.e., 90th percentile or above) of all schools (both Title I and non-Title I) in each of the three years will be named as High Performance Reward Schools if the following conditions are also met:

- For high schools, the school has a graduation rate for the most recently reported year of 82.4% or higher.
- The school made AYP in 2010-2011 in the “all students” group and all of its subgroups (no longer applicable in subsequent years).
- The school does not have any significant achievement gaps between subgroups that are not closing (i.e., is identified as a Focus School under any criteria).
- The school cannot be identified as a Priority School under any criteria.

**High Progress (See Table 2, Key B):** In Oklahoma, all schools (both Title I and non-Title I schools) will have an opportunity to be named as a High Progress Reward School. Schools will be ranked based on the difference in their ‘3-8 Math and Algebra I’ and ‘3-8 Reading and English II’ assessments from two years ago to the current year. Points will be assigned to each assessment with a valid score as follows:

- Advanced = 4 points
- Proficient = 3 points
- Limited Knowledge = 2 points
- Unsatisfactory = 1 point.

The sum of all points is divided by the total number of assessments to create a Progress Index. The Progress Index from Year 1 is subtracted from the Progress Index from Year 3 to create a difference score (e.g., for 2013 designations, the Progress Index from the 2010-2011 year would be subtracted from the Progress Index of the 2012-2013 school year). Schools are ranked by this difference score separately according to their C3 grade level classification (i.e., PK–8 school, Elementary School, Middle School, and High School). Any school that scores at or above the 90th percentile within their classification on the difference score will qualify as a High Progress Reward School. Beginning in 2013-2014, the minimum n-size to calculate a weighted index will be 10 unique students.

To ensure compliance with the *ESEA Flexibility* definition of Reward Schools, schools in the top 10% (i.e., 90th percentile or above of all schools (both Title I and non-Title I) will be named as High Progress Reward Schools if the following conditions are also met:

- The school’s progress is monotonic (i.e., consistent in growth) over the time period.
- For high schools, either the most recently reported graduation rate is 100% or the school is in the top 20% of schools with the largest gains in graduation rate between the most recently reported graduation rate and the graduation rate from two years prior.
- The school does not have any significant achievement gaps between subgroups that are not closing (i.e., is identified as a Focus School under any criteria).
- The school cannot be identified as a Reward School if it has received a School Improvement Grant (SIG) or is identified as a C3 school. Oklahoma made a policy decision to identify SIG and C3 schools as Priority Schools rather than Reward Schools so that the SEA could continue to provide support and resources needed to assist the schools to continue to improve. Once a SIG school has completed SIG implementation, it would become eligible to serve as a high-progress Reward School.
The gains for the High Progress Reward Schools are calculated differently from the gains calculated 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 OSTP Reading and Mathematics, Algebra I EOI, and English II EOI assessments. The points were summed across assessments and divided by the number of assessments to produce an index score.

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; (or identified as a C3 school); the school did not have achievement gaps between subgroups that were not closing; (i.e., a Focus school); 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 (or had a 100% graduation rate in the most recently reported year).

The SEA made a policy decision to provide recognition to both Title I and non-Title I schools as part of the Differentiated Recognition, Accountability, and Support System. The SEA chose to set stringent criteria for these rewards, within the definitions of the ESEA Flexibility document. A significant number of Title I schools met these criteria. Of the 129 schools that met the criteria for Reward School in 2011, 49 were Title I schools; therefore, Title I sites comprised 39% of potential Reward Schools.

**Subsequent Years (Beginning in 2012):** Any Title I or non-Title I school that is identified as an A (including A+ and 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 High Performance Reward School. In addition, any school that would be identified as a High Performance or High Progress Reward School using the same methodologies outlined for 2011 but using the most current data available will also be named as a Reward School as long they do not receive an F on the State’s A-F Grading system.

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.
- 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.
<table>
<thead>
<tr>
<th>Key Milestone or Activity</th>
<th>Detailed Timeline</th>
<th>Party or Parties Responsible</th>
<th>Evidence (Attachment)</th>
<th>Resources (e.g., staff time, additional funding)</th>
<th>Significant Obstacles</th>
</tr>
</thead>
<tbody>
<tr>
<td>Honor all Reward Schools at State Board of Education Meeting</td>
<td>First State Board Meeting following acceptance of Request; Annually at first meeting of the school year</td>
<td>Assistant State Superintendent, Office of School Turnaround, C3 Schools, School Choice</td>
<td></td>
<td>Staff Time Certificates/Plaques</td>
<td>None</td>
</tr>
<tr>
<td>Create a Press Release listing all Reward Schools</td>
<td>Within 15 days of acceptance of Request; Annually in conjunction with first State Board Meeting of the school year</td>
<td>Communications Director</td>
<td></td>
<td>Staff Time</td>
<td>None</td>
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<tr>
<td>Recognize Reward Schools through REACH Network</td>
<td>Annually</td>
<td>Chief of Staff</td>
<td></td>
<td>Staff Time</td>
<td>None</td>
</tr>
<tr>
<td>Invite Reward Schools to the State Superintendent’s Listening Tour</td>
<td>By the end of the 2012-2013 school year</td>
<td>Event Coordinator</td>
<td>Staff Time</td>
<td>Staff Time Travel Costs</td>
<td>Time – May have to conduct regionally</td>
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<tr>
<td>Request citations from Governor and State Legislators</td>
<td>Within 30 days of acceptance of request; Annually</td>
<td>Legislative Liaison</td>
<td>Staff Time</td>
<td></td>
<td>None</td>
</tr>
<tr>
<td>Ensure that Reward Schools are represented through various advisory groups and councils</td>
<td>Beginning with the 2012-2013 school year</td>
<td>Assistant State Superintendent, Office of Educator Effectiveness</td>
<td>Staff Time</td>
<td></td>
<td>None</td>
</tr>
<tr>
<td>Invite Reward Schools to provide training sessions at statewide conferences and regional workshops</td>
<td>June 2012 and following</td>
<td>Assistant State Superintendent, Office of Instruction</td>
<td>Staff Time</td>
<td>None</td>
<td></td>
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<td>---</td>
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<td></td>
</tr>
<tr>
<td>Assistant State Superintendent, Office of School Turnaround, C3 Schools, School Choice</td>
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</tr>
<tr>
<td>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</td>
<td>July 1, 2012</td>
<td>Assistant State Superintendent, Office of Federal Programs Comptroller Legislative Liaison</td>
<td>Significant staff time for training on flexible uses of funds Technical Assistance Costs</td>
<td>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.</td>
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<tr>
<td>Provide financial rewards to Reward Schools – with an emphasis on high-progress schools and high-poverty schools – if funding is available</td>
<td>Within 60 days of acceptance of Request; Annually</td>
<td>Assistant State Superintendent, Office of Federal Programs Comptroller</td>
<td>Staff Time Federal funds designated for recognition programs State Funds</td>
<td>Funding may not be available.</td>
<td></td>
</tr>
<tr>
<td>Offer grant opportunities to Reward Schools willing to partner with Priority Schools within the same LEA or in surrounding LEAs to assist all partner schools with continuous improvement</td>
<td>2012-2013 school year</td>
<td>Assistant State Superintendent, Office of Federal Programs, Assistant State Superintendent, Office of School Turnaround, C3 Schools, School Choice</td>
<td>Federal funds designated for recognition programs, Federal funds designated for improving teacher and principal quality, State Funds</td>
<td>Funding may not be available.</td>
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</tr>
<tr>
<td>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</td>
<td>2011-2012 school year</td>
<td>Executive Director of Parent and Community Engagement</td>
<td>Staff Time, Community Funds</td>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>
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 the original ESEA Flexibility Request, the State’s newly adopted A-F School Grading System had not been implemented. Implementation began in the 2012-2013 school year; therefore, initial identification of Priority Schools was based on the methodology described below. Identification of Priority Schools in subsequent years is based on the A-F School Grading System as well as the following methodologies 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 (i.e., Summer of the previous year to Spring of the current school year). These include assessments of Grades 3-8 reading and mathematics, and at the high school level, Algebra I and English II for all students, which includes students with disabilities and English Learners, administered during the most recent school year and prior years as defined in the High Performance 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 as Priority Schools 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 OCCT, OMAAP, and OAAP; Algebra I OCCT, OMAAP, and OAAP; and English II OCCT, OMAAP, and OAAP), 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, PK – 8, or high school. Any Title I school in the bottom 5% of Title I schools as well as any non-Title I school with equitable student achievement 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 or identified as a C³ school 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 § 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 (C³). Any school that would have been identified as a Priority School using the Category 2 (Graduation Rate below 60% for three consecutive years) and Category 3 (SIG) methodologies outlined for 2011 but using the most current data available will be identified as Priority Schools. Beginning in 2014, any school with a graduation rate of 50% or less in any given year will be identified as a Priority School. If the number of Title I schools identified as a Priority school via these methods is not equal to or greater than 5% of all Title 1 schools, then schools that would be identified as Priority Schools using the Category 1 methodologies outlined for 2011 but using the most current data available will also be named as Priority Schools, until the requisite number of schools is identified. This will ensure that at least 5% of Title I schools in the state will be identified as Priority Schools. Beginning in 2013, the minimum n-size to calculate a weighted index will be 10 unique students.

Beginning in 2012, LEAs will have 10 days to submit appeals to identification on the preliminary Priority School List.

#### 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 (C³) by the year 2020: C³ 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.

The SEA completed the steps listed below as part of the implementation of Priority School Turnaround Principles. This process will be discussed in detail throughout this section.

1. **SEA hires the State Director of C³ Schools.** (December 2011)
2. **SEA contacts all schools preliminarily identified as Priority Schools and conducts informational webinar.** (December 2011)
3. **SEA establishes Priority Schools Advisory Board and Executive Committee.** (January 2012)
4. **Executive Committee conducts an LEA Capacity Review.** (To begin approximately three weeks after the announcement of *ESEA Flexibility Request* approval)
5. **SEA Academic Leadership Team examines the outcome of the LEA Capacity Review and makes recommendations to the State Board of Education.** (Within approximately one week of completion of the LEA Capacity Review)
6. **State Board of Education makes a decision regarding inclusion of Priority Schools in the C³ Schools.** (First State Board of Education meeting following the LEA Capacity Review)
7. **SEA assumes control of the academic functions of schools recommended for the C³ Schools, overseen by the State Director of C³ Schools, if needed.** (Transition to begin immediately following State Board of Education meeting with full implementation prior to the 2012-2013 school year)
8. Determine which, if any, of the C3 Schools would be better operated by an Educational Management Organization (EMO) and contract with such EMO.

**LEA Capacity Review**

LEAs must demonstrate that the LEA has the capacity to support dramatic improvement in the Priority Schools 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 year the school is identified and for at least the following two school years for each Priority School in the LEA. In determining capacity, the SEA and the Priority Schools Advisory Board (discussed below) will place significant weight on historical information about the school and LEA, including proficiency rates of all students and subgroups, progress, staffing mobility and needs, and demonstration of adjustments to meet the needs of changing demographics in the local community. The SEA will support LEAs that are able to demonstrate this capacity as they implement the Turnaround Principles.

**Priority Schools Advisory Board:** The SEA will create a Priority Schools Advisory Board. The board members will consist of the State Director of C3 Schools, other SEA personnel, practicing educators, School Support Team leaders, members from the Committee of Practitioners, community stakeholders, career and technology education representatives, 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 State Director of C3 Schools and Priority School LEAs for the purpose of determining progress 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, as described in Section 2.D.v.

**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 OSTP scores in reading/language arts
  - School and district OSTP 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 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

**C³ Partnership Schools:** LEAs that are unable to demonstrate capacity and the ability to facilitate improvement will partner and collaborate on all aspects of a Priority School’s academic operations that directly or indirectly relate to student achievement with the SEA. The State Board of Education and the State Superintendent of Public Instruction will partner with the LEA in the operations and management for schools designated as C³ Schools as they directly or indirectly relate to student achievement; however, during the period of time that the school operates as part of the C³ Schools, the school retains its county-district-site code. The purpose of the C³ Schools is to highlight the strategies and activities that are most likely to lead to dramatic improvement of schools and to serve as models for other low performing schools in the State. 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 management of the LEA. The intent of these activities is to enable the LEA to deliver improved services to all schools within the LEA.

**Funding**

Funding for the C³ 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% consistent with the requirements listed below, 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.

Each LEA with at least one Title I Priority School may be required to set aside a percentage of its Title I, Part A allocation in consultation with the SEA, which is reasonable and necessary to implement the Turnaround Principles in the Priority Schools, to provide school choice options for parents/guardians of students in the school, and implement district-wide turnaround initiatives that impact Priority Schools approved by the SEA. 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.

Based on demand, at least 5% of the LEA’s Title I, Part A allocation may be available to provide school choice options to parents/guardians of students in Title I Priority Schools. These funds will provide transportation from the Priority Schools to higher-performing schools that are able to accept additional students or implement other SEA approved school choice options.

Title I Priority Schools or Title I-eligible high school Priority Schools that are not operating Title I Schoolwide Programs may begin operating Schoolwide Programs since the LEA or C3 Schools will be implementing interventions consistent with the Turnaround Principles, according to procedures established by the Office of Federal Programs at the SEA. 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.

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, consistent with the requirements of Section 1113 in ESEA. 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 Oklahoma Academic Standards (OAS). 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.

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.
Requirements for Priority Schools

As stated above, 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 C3 Schools.

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 C3 Schools is defined below.

Implementation of Turnaround Principles in Schools not in the C3 Schools: 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 OAS.
- 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.

Implementation of Turnaround Principles in the C3 Schools: For those Priority Schools in partnership
with the C3 Schools, the State Board of Education may choose either to require implementation of the
Turnaround Principles as described for those schools not in the C3 Schools or to contract with an
Educational Management Organization (EMO) to work under the leadership of the State Director of C3
Schools for operational oversight of the schools in the C3 Schools, according to the following Turnaround
Principles:

- The State Director of C3 Schools or EMO 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 State Director of C3 Schools or EMO and the State Superintendent of
  Public Instruction.

- In conjunction with the State Director of C3 Schools or EMO, 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 State Director of C3 Schools or EMO, 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 State Director of C3 Schools or EMO, 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 OAS.

- 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 State Director of C3 Schools or EMO 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 State Director of C3 Schools or
  EMO.

**Required Resources, Activities, and Interventions:** All Priority Schools must utilize the appropriate
resources and professional development identified by the State Department of Education, including those
described in Section 2.G designed for intensive and focused support of schools in consultation with the SEA,
including the What Works in Oklahoma Schools needs assessment survey, Oklahoma Data Review Model,
and professional development designed to meet the needs of teachers and administrators in Priority Schools.
In addition, all Priority Schools with low achievement of IEP and/or EL students must implement the interventions discussed in Section 1.B. Because schools in the C3 Schools are Priority Schools, it is anticipated that they will participate in all professional development and interventions that are required of other Priority Schools; however, if the State Director of C3 Schools determines that other equivalent professional development or interventions are being provided, the State Director of C3 Schools may choose to exempt a school in the C3 Schools from participation in one or more of the requirements of all Priority Schools on a case-by-case basis.

Oklahoma Online Planning Tool (OPT) All Priority Schools will be required to use the Oklahoma Online Planning Tool based on the State’s Nine Essential Elements and Performance Indicators (described in detail in Section 2.G). For Priority Schools in the C3 Schools, the State Director of C3 Schools or EMO will assist principals in determining the focus of the school’s improvement plan created through OPT. 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 OPT most appropriate for those settings. All Priority Schools will be required to attend SEA-, LEA-, and C3 School leadership-provided professional development targeted to the intervention strategies implemented in the school and based on the school’s improvement plan created through OPT. 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 State Director of C3 Schools or EMO will conscientiously protect instructional time for classroom teachers.

REAC3H Network: All Priority Schools will be required to participate in their local REAC3H Network, to receive training from REAC3H Coaches, and to implement instructional strategies aligned to the OAS.

Advanced Placement: All Priority Schools will be required to participate in Advanced Placement (AP) and/or Pre-AP professional development in order to assist with implementation of OAS and to accelerate the learning of students who are underperforming.

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 C3 Schools 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
- C3 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.

**For Priority Schools identified in the 2011-2012 school year:** For those LEAs that maintain control of their Priority Schools, Turnaround Principles must be implemented during the 2012-2013 school year and subsequent years. Because the SEA partnered with all other Priority Schools beginning July 1, 2012, and began implementing the Turnaround Principles immediately, the turnaround principles were implemented in all Priority Schools during the 2012-2013 school year. While all LEAs continued to operate Priority Schools for the 2011-2012 school year, LEAs must cooperate with the SEA, State Board of Education, and C3 Schools 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 had determined that the LEA was providing a barrier to the implementation of C3 Schools and Turnaround
Principles, the State Board of Education may have obtained control of the school identified as a Priority School immediately. The plan shown below outlines the steps that were taken before July 2012.

For Priority Schools identified in the 2012-2013 school year or any year thereafter: If, due to delays in identification, any LEA is unable to implement the Turnaround Principles in a Priority School during the school year in which the school was identified as a Priority School, the identification year will be considered a partial implementation year, with the three years of full implementation beginning in the following school year. This will be determined through regular reporting and monitoring that will continue through subsequent years.

All currently identified Priority Schools will be implementing all turnaround principles by the 2014-2015 school year. The core methodology for monitoring implementation has not changed, with the exception of a change from the WISE to MTW’S GMS (Online Planning Tool [OPT]) consolidation of reporting for all schools that includes specific reporting for Priority, Focus, and Targeted Intervention schools on implementation of all Turnaround Principles.
<table>
<thead>
<tr>
<th>Key Milestone or Activity</th>
<th>Detailed Timeline</th>
<th>Party or Parties Responsible</th>
<th>Resources (e.g., staff time, additional funding)</th>
<th>Significant Obstacles</th>
</tr>
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<tbody>
<tr>
<td>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</td>
<td>February – May 2012</td>
<td>State Superintendent</td>
<td>Staff Time</td>
<td>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.”</td>
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<td>Legislative Liaison</td>
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<td>Determine funding amounts for each Priority School</td>
<td>No later than June 1, 2012</td>
<td>Assistant State Superintendent, Office of Federal Programs</td>
<td>Staff Time</td>
<td>Calculating Title I district allocations for federal FY12 (state FY13) including funds to be reserved at the SEA to serve the C3 Schools.</td>
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<td>Comptroller</td>
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<tr>
<td>Allow LEAs to submit documentation of their capacity to implement Turnaround Principles in Priority Schools</td>
<td>February 2012</td>
<td>State Director of C3 Schools</td>
<td>Staff Time</td>
<td>None</td>
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<td></td>
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<td>State Superintendent of Public Instruction</td>
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<td>General Counsel</td>
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<tr>
<td>Hire State Director of C3 Schools</td>
<td>December 1, 2011</td>
<td>State Superintendent of Public Instruction</td>
<td>Staff Time</td>
<td>Reserved funds will be used to pay for the services overseen by the State Director of C3 Schools and EMO.</td>
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<td>General Counsel</td>
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<tr>
<td>Evaluate principals in C3 Priority Schools</td>
<td>No later than April 1, 2012</td>
<td>State Director of C3 Schools and/or EMO</td>
<td>Staff Time</td>
<td>TLE Commission work may not be complete, so judgments may be made on existing qualitative criteria and State Director of C3 Schools expertise.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Executive Director of Teacher and Leader Effectiveness</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| Determine which principals and teachers will be allowed to continue working in C3 Priority Schools and hire replacements as necessary | No later than June 1, 2012 | State Director of C3 Schools and/or EMO  
Executive Director of Teacher and Leader Effectiveness | Staff Time | TLE Commission work may not be complete, so judgments may be made on existing qualitative criteria and State Director of C3 Schools 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 C3 Schools 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. In addition, the school cannot be in the bottom 5% of performance in the state in reading and mathematics as defined in Section 2.D.i, and the school cannot have a graduation rate less than 60% for at least three years as defined in Section 2.D.i., if these criteria are needed to ensure that at least 5% of Title I schools are identified as Priority Schools in the current school year.

If a school exits Priority Status, 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 C3 Schools 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 C3 Schools.
- 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 C3 Schools.
- 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 C3 Schools, or the State Board of Education may reassign control of the school to the original LEA, another LEA, or a Charter School Operator.

In addition, the Priority Schools Advisory Board will make recommendations to the SEA and State Board of Education regarding continuation of C3 School status. As described previously, the board members will consist of the State Director of C3 Schools, other SEA personnel, practicing educators, School Support Team leaders, members from the Committee of Practitioners, community stakeholders, career and technology education representatives, and higher education representatives. The board will annually review all relevant documentation from the State Director of C3 Schools 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.

**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 the initial ESEA Flexibility Request, the State’s newly adopted A-F School Grading System had not been implemented. Implementation began in the 2012-2013 school year; therefore, initial identification of Focus Schools was based on the methodology described below. Further, identification of Focus Schools in future years will not be based on the A-F School Grading System because the A-F School Grading System does not capture the intent of Focus School Definition related to subgroup performance.

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 (i.e., Summer of the previous year to Spring of the current school year. These include assessments of Grades 3-8 reading and mathematics OCCT, OMAAP, (prior to 2013-2014), and OAAP, and at the high school level, Algebra I and English II OCCT, OMAAP, (prior to 2013-2014), and OAAP, for all students, 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.

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 as Focus Schools 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 Academic Performance Index and mathematics Academic Performance Index 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 10% Black students would be considered because the State’s enrollment of Black students is 10% of the population.)

Schools are ranked using the results from all grades 3-8 Reading and Math, Algebra I, and English II assessments. The criteria for inclusion in the ranking is identical to the criteria for the A-F Report Card (e.g., students must have been enrolled in the school for the Full Academic Year, been a first time test taker, etc.). Points are assigned to each assessment with a valid score based on the following scale:

- Advanced = 4 points
- Proficient = 3 points
- Limited Knowledge = 2 points
- Unsatisfactory = 1 point.
Performance levels are subject to the federally mandated 2% OMAAP (prior to 2013-2014) and 1% OAAP proficiency caps. These points are summed within subject area (i.e., Math and Reading) and subgroup, divided by the number of valid tests within that subject area/subgroup combination to create an index for each subject/subgroup. At least 25 students are required to create an index (beginning in 2013-2014 the minimum number of students will be reduced to 10). Reading and Math indices are then averaged together (weighted by the number of tests that go into each index) to create the Focus Index for each subgroup. Schools are ranked separately according to their C3 grade level classification (i.e., PK – 8 school, Elementary School, Middle School, and High School). Any Title I school that scores below the 30th percentile within its classification on any Focus Index (as well as any non-Title I school with equitable subgroup achievement) will qualify as a Focus school for that particular subgroup unless that school has been named a Priority School. 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.

For 2011, Oklahoma chose to identify as Focus Schools those schools with poor performance in their students with disabilities (IEP), English Learners (EL), and Black subgroups if the school had higher than the state’s average population percentage for that subgroup. This definition was developed so that the SEA could focus assistance to those schools to help increase performance for these subgroups. In the future, if all schools that exceed the state’s average population percentage for those subgroups have high achievement, the State will look toward identifying schools that have a lower percentage of students in those subgroups in which the students are not performing. Further, if the State closes the achievement gap for those subgroups, the State will reexamine the subgroups used for identification of Focus Schools. (See Attachment 18: Oklahoma’s Support of Minority and Poverty Students in Schools Not Identified as Focus or Priority Schools.)

Black
- 10% of state population is African American
- 368 (21%) schools have an African American population greater than the state average representing 76% of the state population
- Of the 368 schools, only 324 have an N>25 representing 70% of the African American population
- Identified 74 (23%) of the 324 as a Focus School representing 21% (approx. 7000 students) of the African American population

ELL
- 5% of the state population is ELL
- 387 (22%) schools have an ELL population greater than the state average representing 78% of the state population
- Of the 387, only 168 have N>25 representing 63% of the state ELL population
- Identified 45 (27%) of the 168 as a Focus School representing 22% (approx. 4000 students) of the state ELL population

IEP
- 17% of the state population has an IEP
- 811 (48%) schools have an IEP population of students > 25 representing 78% of the state IEP population
983 (57%) schools have an IEP population greater than the state average representing 60% of the state IEP population

496 (29%) schools with a population greater than the state average and N of students > 25 represent 48% of the state IEP population

Identified 137 (17%) of the 496 as a Focus School representing 11% (approx. 6400 students) of the state IEP population

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 10% Black students would be considered because the State’s enrollment of Black students is 10% 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 non-Title I with an equitable graduation rate 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 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. This will ensure that at least
10% of Title I schools in the state will be identified as Focus Schools. As described earlier, beginning with data from the 2013-2014 year, the minimum n-size required to calculate a Focus Index will be 10 students.

It is possible that schools with the largest achievement gaps and schools contributing to the State’s achievement gap will not receive a low grade on the A-F School Grading System Report Card. This is likely to happen when the school has a large population of students in one or more subgroups that are performing very well and a much smaller population of students in one or more subgroups that are performing very poorly. In these cases, the school’s overall grade based on all students could be an A, B, or C. Therefore, beginning in 2012, Oklahoma decided to identify only those schools that meet the criteria described in the ESEA Flexibility Request to identify Focus Schools.

Beginning in 2012, LEAs will have 10 days to submit appeals to identification on the Focus School List.

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 (C3) by the year 2020: C3 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, including specific subgroups. This differentiation in interventions that are required to be implemented in no way lowers the rigorous expectations for school improvement or intervention strategies; rather, the purpose of the differentiation is to provide highly stringent but appropriate interventions in schools that will meet the needs of the students who are struggling to meet C3 benchmarks.

An appropriate alignment will be demonstrated between needs assessment data, the school improvement plan, intervention strategies selected and implemented, Title I set asides, and all school expenditures as described below.

**Required Resources, Activities, and Interventions:** All Focus Schools must utilize the appropriate resources and professional development identified by the State Department of Education, including those described in Section 2.G designed for intensive and focused support of schools in consultation with the SEA, including the What Works in Oklahoma Schools needs assessment survey, Oklahoma Data Review Model, and professional development designed to meet the needs of teachers and administrators in Focus Schools. For example, if space is available, principals of Focus Schools will be encouraged to attend the Principal’s Academy described in Section 2.G, and any principal in a Focus School that demonstrates lack of leadership will be required to attend the Principal’s Academy. In addition, all Focus Schools with low achievement of IEP and/or EL students must implement the interventions discussed in Section 1.B. For example, if the school was identified as a Focus School based on the EL subgroup, the school must complete a Language Instruction Educational Plan for each low-achieving EL student as described in
Section 1.B.

Focus schools will receive training on conducting a comprehensive needs assessment. One component of the training will include utilizing the What Works in Oklahoma Schools Resource Toolkit. The Toolkit includes administrator, teacher, and student surveys aligned to Oklahoma’s Nine Essential Elements. Examples of the surveys are available in an online format and are located on the Oklahoma State Department of Education Website. Data from the surveys can be analyzed to determine which interventions are best to close the achievement gaps and meet the needs of individual students.

Examples of other data to be included in the comprehensive needs assessment training are: OSTP achievement; district benchmark; student attendance; student behavior; and other relevant data focused on improving the performance of the identified subgroup. The schools, in consultation with SEA staff, will select research-based differentiated supports from the Menu of Interventions and Supports for School Improvement (see Attachment 12) that are most appropriate for their schools, and for the students in the identified subgroup in particular. These interventions and supports are in the following categories:

1. Schoolwide Interventions & Supports
2. Leadership Interventions & Supports
3. Teacher Interventions & Supports
4. Classroom Interventions & Supports
5. Parent and Community Interventions & Supports

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 appropriate state indicators from the Oklahoma Online Planning Tool (OPT) and may choose to use the What Works in Oklahoma Schools needs assessment survey (described in detail in Section 2.G) in order to determine the root causes of low student performance in the school. 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 OPT, by assisting the LEA and site principal in selecting approved interventions that align with site needs. 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 OPT 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 OPT.

The principal of each Focus School, along with a team of teacher leaders, will be required to use data to drive instruction and may participate in state-provided training in the Oklahoma Data Review Model. Data review presentations and relevant documents are located on the OSDE Webpage at http://www.sde.state.ok.us/NCLB/SIG.html. Training will include using data to set performance targets for each building and grade level, planning for the success of all children, and closing achievement and expectation gaps for every subgroup.

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 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. 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 Oklahoma Academic Standards (OAS). Other data to be reviewed may include student behavior and professional activities. Schools will develop timely action steps targeted to improve student achievement and close achievement gaps in specific subgroups.
Each LEA with at least one Title I Focus School may 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, which may include providing school choice options for parents/guardians of low-achieving students, or to implement district-wide turnaround initiatives that impact achievement in Focus Schools approved by the SEA. This percentage will be determined on a sliding scale and will take the following into consideration:

- the number of low-achieving students in the school,
- 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.

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. It is likely that Focus Schools will direct the majority of these set-aside funds toward interventions for low-achieving students in the subgroup(s) that led to identification; however, the school may use the set-aside funds for low-achieving students regardless of subgroups in accordance with other Title I funding requirements or for district-wide turnaround initiatives that impact students in Focus Schools approved by the SEA.

Title I 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 has established procedures for this transition. LEAs with Title I-eligible Focus Schools that are not being served with Title I funds are strongly encouraged to begin serving these schools with Title I funds, consistent with the requirements of Section 1113 in ESEA, in order to meet the academic needs of these students.

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, consistent with the requirements of Section 1113 in ESEA. 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 OAS. 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.
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 all AMOs in the student subgroup(s) for which the school was identified as a Focus School, based on the State’s new Differentiated Accountability, Recognition, and Support System for two consecutive years; and
- Not meet the criteria for Focus School status for any other subgroup of students.

If a school already designated as a Focus School does not meet the minimum N-size for AMOs for the subgroup for which the school was identified as a Focus School, an AMO will still be calculated (but not publicly reported) so that the school has the possibility to demonstrate a narrowing of achievement gaps. 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.
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:

<table>
<thead>
<tr>
<th>Designation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Reward School</td>
</tr>
<tr>
<td>B</td>
<td>LEA-identified Interventions</td>
</tr>
<tr>
<td>C</td>
<td>LEA-identified Interventions</td>
</tr>
<tr>
<td>D</td>
<td>Targeted Intervention School</td>
</tr>
<tr>
<td>F</td>
<td>Priority School</td>
</tr>
</tbody>
</table>

*Focus School* designations will be made apart from the State’s A-F School Grading System as described in Section 2.E.

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 for schools receiving a School Grade of B 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.

The SEA has worked diligently toward ensuring local education agencies are provided with appropriate supports and interventions for all Title I Priority and Focus schools, as well as ‘other Title I schools’ not already identified as Priority or Focus. The SEA’s efforts have largely focused on closing the achievement gap in all schools, increasing student achievement performance, and improving teacher instructional delivery. Because of this, the SEA Title I Office requires local education agencies participating in the use of Title I funds to perform a thorough Comprehensive Needs Assessment. The Needs Assessment is included in the Consolidated Application Workbook that is found in the online Grants Management System, and reveals information about the school’s existing systems addressing academic performance, the learning environment, and operational efficiency. (See Attachment 28 for an example of an LEA’s Comprehensive Needs Assessment.) From the results of the Needs Assessment, the local education agencies are able to press forward in planning their Title I budgets and grant applications. Strategies must be included that are well aligned to the district’s five key goals.

Based on the analysis of each school’s Comprehensive Needs Assessment, which may include data from various surveys, the Oklahoma Online Planning Tool (OPT), student achievement data, student behavior and attendance data, the SEA understands that all schools are different in their educational make-up and has
determined to allow schools flexibility in selecting interventions and supports aligned with specific needs of the school. This list of recommended interventions and supports has been entitled, *Menu of Interventions and Supports* (see Attachment 12), and may be used by all Title I participating schools, whether they be classified as Priority, Focus, Targeted Intervention, Reward, or non-designated. This list is included in the Grants Management System in the Title I portion of the grant application.

The SEA believes that this list provides appropriate evidence of supports and interventions for ‘other Title I schools’ not already identified as Priority or Focus.

Further, any high school with a graduation rate that does not meet the Graduation Rate AMO for the All Students group will be provided with support from the SEA’s Counseling/ACE Team. This support will be prioritized to schools with the lowest graduation rates and will include such activities as the following:

- Assist with analyzing student characteristics of dropouts,
- Assess hypotheses regarding the causes of low graduation rate,
- Provide instruction in strategies likely to retain students,
- Provide instruction in strategies likely to recover dropouts, and
- Develop a plan for increasing the school’s graduation rate.

**School Improvement Plans**

Oklahoma state law requires all schools to have a school improvement plan that is updated annually. Schools that are awarded a School Grade of C 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). These interventions and supports are in the following categories:

1. Schoolwide Interventions & Supports
2. Leadership Interventions & Supports
3. Teacher Interventions & Supports
4. Classroom Interventions & Supports
5. Parent and Community Interventions & Supports

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.

Schools will be offered school improvement planning training for the Online Planning Tool based on the State’s Nine Essential Elements and Performance Indicators (described in detail in Section 2.G). A variety of methods will be used to train, including workshops, Webinars, videos, and videoconferences.

**Requirements for Targeted Intervention Schools**

Innovating beyond the *ESEA Flexibility* requirements, Oklahoma will initially require interventions of all schools that are in the bottom 25% of the State in student achievement that have not been identified as Priority Schools or Focus Schools. These schools will be identified as Targeted Intervention Schools (See Table 2, Key I) and must complete a comprehensive needs assessment, which includes a review of the school’s most recent OSTP data and other relevant data, and may include data from the What Works in
Oklahoma Schools needs assessment surveys. Schools will select targeted interventions and strategies consistent with the research-based Menu of Interventions and Supports for School Improvement (see Attachment 12). These interventions and supports are in the following categories:

1. Schoolwide Interventions & Supports
2. Leadership Interventions & Supports
3. Teacher Interventions & Supports
4. Classroom Interventions & Supports
5. Parent and Community Interventions & Supports

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.

Beginning in 2012, schools that receive a School Grade of D (including D+ and D-) and high schools that have a graduation rate of 50%-60% in any given year that have not been identified as Priority, Focus, or Reward Schools will be identified as Targeted Intervention Schools and will be required to implement interventions and strategies consistent with the research-based Menu of Interventions and Supports for School Improvement (see Attachment 12). Beginning in 2012, LEAs will have 10 days to submit appeals to identification on the Targeted Intervention School List.

LEAs with Title I schools that are Targeted Intervention Schools 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 or on district-wide turnaround initiatives that will impact Targeted Intervention Schools approved by the SEA. 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.

Targeted Intervention Schools 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 OPT, Oklahoma’s Nine Essential Elements, and 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 OPT 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.

Required Resources, Activities, and Interventions: Beginning with schools identified based on 2011-2012 test data, all Targeted Intervention Schools must begin implementing the Turnaround Principles within twelve months of being identified as Targeted Intervention Schools or petition for a waiver of one or more Turnaround Principles. Progress toward meeting the Turnaround Principles will be reported semi-annually to the Oklahoma State Department of Education and the Oklahoma State Board of Education. Turnaround Principles must be implemented for a period of three years, even if the school exits Targeted Intervention status.

All Targeted Intervention Schools must utilize the appropriate resources and professional development identified by the State Department of Education, including those described in Section 2.G designed for intensive and focused support of schools in consultation with the SEA, including the What Works in
Oklahoma Schools needs assessment survey, Oklahoma Data Review Model, and professional development designed to meet the needs of teachers and administrators in Targeted Intervention Schools. For example, if space is available, principals of Targeted Intervention Schools will be encouraged to attend the What Works in Oklahoma Schools Conference described in Section 2.G. In addition, all Targeted Intervention Schools with low achievement of IEP and/or EL students must implement the interventions discussed in Section 1.B. For example, the school should complete a Language Instruction Educational Plan for each EL student with low achievement as described in Section 1.B.

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.

School and LEA monitoring and technical assistance for intervention implementation is designed to increase the capacity of school and district leadership. For example, when OPT plans (described below) are reviewed, the SEA provides feedback to LEAs and sites regarding gaps in capacity and ineffective implementation of required interventions. This support provides districts with increased capacity to identify needs and implement interventions that will lead to improved student achievement.

Monitoring of LEAs/Schools

Oklahoma’s Online Planning Tool (OPT): Priority Schools and Focus Schools will submit their school improvement plans through the OPT 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 SEA’s Office of Federal Programs, the Office of Educator Effectiveness, 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 C3 Schools 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 beginning in their second year of identification as a Focus School if, during the first year, the school does not meet all AMOs for the subgroup(s) that led to identification. 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 will be assigned to Focus Schools as funding is available 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 Educator Effectiveness, Office of School Turnaround, C3 Schools, School Choice (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.

School and LEA accountability, including monitoring of regulations implementation, is designed to increase the capacity of school and district leadership. For example, when Regional Accreditation Officers (described below) monitor district implementation of state and federal laws, they identify gaps in school capacity and unnecessary redundancies. The SEA, LEAs, and sites are then able to collaborate with the Regional Accreditation Officers on processes that will increase district capacity to meet regulations that will ultimately improve student achievement.

A-F School Grading System: The SEA 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.

School Support/School Improvement Monitoring: The School Support/School Improvement Team 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 has been 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 the State Director of C³ Schools, other SEA personnel, practicing educators, School Support Team leaders, members from the Committee of Practitioners, community stakeholders, career and technology education representatives, 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 State Director of C³ Schools 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, as described in Section 2.D.v.

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.

The SEA processes will include developing training/technical support for LEAs and schools that will ensure resources are maximized and allocated toward strategic goals. LEAs and schools will be trained in developing a comprehensive needs assessment (as discussed in detail below) and analyzing data to make informed fiscal decisions, including federal, state, and local dollars. LEAs will demonstrate an appropriate alignment between needs assessment data, school improvement plans, intervention strategies selected and implemented, Title I funds, and all school expenditures.
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.

University of Virginia’s School Turnaround Program: The University of Virginia’s School Turnaround Program, housed in the Darden School of Business, has proven to have significant impact on student achievement through implementation of site-, district-, and state-systems change to support turnaround work in underperforming schools. Oklahoma has joined the Southwest Consortium of States working to support LEAs implementing the practices of the School Turnaround Program. In partnership with the South Central Comprehensive Center (SC3), the SEA is able to build the capacity of LEAs and schools to improve student learning experiences. Participation in the program has also greatly increased the capacity of the SEA by providing current research, practices, and expertise to our ongoing work.

Cross-State Learning Collaborative Affiliates (CSLCA): The CSLCA grant increased the SEA’s capacity by connecting us with other SEA leaders working to integrate education reforms, such as college- and career-ready (CCR) standards and teacher effectiveness initiatives. With expertise from consultants, other state leaders, our own staff, and our LEA partners, the SEA developed new methodologies for delivering customized professional learning opportunities to teachers and administrators across the State.

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 the Teacher and Leader Effectiveness Evaluation System (TLE), A-F School Grading System, Third Grade Reading Success, Oklahoma Academic Standards (OAS) Implementation, and the state assessments.

**Professional Learning Community Teams:** The SEA implements The Professional Learning Community (PLC) Team Concept in support of (OAS) and other state reforms 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 EL instructional strategies.

- **Focused Support for Schools (Focus Schools, Targeted Intervention Schools)** includes standard and differentiated support as identified by specific needs of students. For example, if a school had an EL subgroup that did not meet the reading performance benchmark, the
school may need to hire EL coaches or participate in SEA-provided professional development in Sheltered Instruction Observation Protocol and literacy strategies.

- **Intensive Support for Schools (Priority Schools, C3 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.

**Examples of 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 Performance Indicators of effective practice that represent all aspects of school operations (See Attachment 13). For those schools utilizing the OPT (detailed below), the Elements are embedded in and aligned with the school improvement plan. Priority and Focus Schools would be required to utilize OPT and Oklahoma’s Nine Essential Elements Performance Indicators and Rubrics to develop a comprehensive plan to improve teaching and learning.

**Oklahoma’s Online Planning Tool (OPT):** OPT, formerly known as Ways to Improve School Effectiveness (WISE), developed by the Center on Innovation and Improvement, is an online planning tool for schools and is based on the Oklahoma Nine Essential Elements. OPT allows districts and schools to meet federal Title I requirements and LEA requirements. OPT is designed to help district and school staff identify which of the Nine Essential Elements performance indicators to assess, plan, and monitor.
Features of OPT include self-assessing district and school indicators; utilizing 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 was 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 OAS. The project grew teacher leaders in a number of ways:

- Members attended an intensive 3-day summer institute where they receive training in research-based instructional strategies and facilitation of professional development sessions. Training was provided by nationally-known presenters and the SEA’s Curriculum Team.
- Members conducted professional learning groups in their districts to deepen the content and pedagogical knowledge of instructional teams as they researched and discussed best practice and lessons learned, through collaboration. Instructional teams received this job-embedded professional development on a voluntary basis and shared their conclusions with their colleagues regularly.
- Members received content-specific literature and teaching materials to add to their professional libraries.
- Graduates of the two-year project were eligible to apply for membership in the Master Teachers Leadership Project. Members designed, implemented, and collected efficacy data on school improvement projects in their home districts.

MTP members in each region served 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 were selected by the conference committees from proposals submitted to the SEA online. The Oklahoma PASSages Regional Curriculum Conferences provided opportunities for highly effective teachers to share their content knowledge and best practices. One-day conferences “for teachers, by teachers” offered sessions in mathematics, science, reading and language arts, social studies, fine arts, and world languages. Other sessions provided training in classroom management techniques, differentiating curriculum, working with generational poverty, incorporating strategies for ELs, and co-teaching techniques for mainstreamed students with special needs. All sessions demonstrated a connection to raising students’ measurable achievement. Nationally-known keynote speakers focused on topics of interest to all educators. In 2011, keynoters addressed new state standards in English language arts and mathematics, supported by breakout sessions throughout the day.

The mission of the regional conferences was 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 served as a springboard for the REAC'3H Network to implement OAS, TLE, Third Grade Reading, and other state initiatives.

By 2011, MTP had 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.
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 OAS.

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 OAS 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](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.

Examples of 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 were held annually between 2005 and 2011, 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.

Examples of 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 Oklahoma Academic Standards (OAS), 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 OPT 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 OPT 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 OAS. 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.

**Literacy SWAT Team:** The SEA’s Literacy experts provide services to schools by identifying areas of strength and weakness within the school’s literacy instruction program, providing access to brain research and best practices for teaching reading, and offering intensive support and guidance as schools implement reading interventions in early grades.

**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.
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.

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<thead>
<tr>
<th>Option A</th>
<th>Option B</th>
<th>Option C</th>
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<tbody>
<tr>
<td>□ If the SEA has not already developed any guidelines consistent with Principle 3, provide:</td>
<td>□ If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide:</td>
<td>□ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide:</td>
</tr>
<tr>
<td>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;</td>
<td>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;</td>
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<td>ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and</td>
<td>ii. evidence of the adoption of the guidelines (Attachment 11);</td>
<td>ii. evidence of the adoption of the guidelines (Attachment 11); and</td>
</tr>
<tr>
<td>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).</td>
<td>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;</td>
<td>iii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines.</td>
</tr>
</tbody>
</table>
**Educator Effectiveness Theory of Action** (See Attachment 22)

Educators and researchers agree that **Teacher Effectiveness** is the single most important school-based factor in student academic achievement.

Foundational beliefs of the SEA regarding **Educator Effectiveness**:
- **Every child** deserves to have an effective teacher every year.
- **Every teacher** deserves to have a team of effective leaders throughout his/her career.
- **Effectiveness** can be developed.
- **Educator growth** is best achieved through deliberate practice on specific knowledge and skills.

The SEA will provide leadership for **Educator Effectiveness** by:
- Developing a system to assess educator strengths and weaknesses;
- Providing access to high-quality professional development; and
- Guiding districts through a framework of offering individualized professional learning opportunities including – but not limited to – best practices videos, peer collaboration, coaching, hands-on workshops, and professional reading; and
- Seeking ongoing feedback to improve the system and professional development opportunities provided.

In order to allow the SEA and LEAs to focus on developing and implementing more meaningful evaluation and support systems, the SEA has requested the waiver of requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers.

**I. Adopted Guidelines and Explanation** (See Attachment 10)

During the 2010 Regular Session, the Oklahoma Legislature made bold changes to its Teacher and Leader Evaluation System. The Legislature mandated some elements of the Oklahoma Teacher and Leader Effectiveness Evaluation System (TLE) by statute and required that the Oklahoma State Board of Education (OSBE) adopt additional guidelines of the TLE. By the 2015-2016 school year, each school district in the State must implement a teacher and principal evaluation policy based on the statewide TLE System, which will incorporate student academic growth data from the prior school year as a significant component (see Attachment 10A: Oklahoma Statutes Related to TLE).

**Multiple Measures of Effectiveness**

The TLE shall comprise both quantitative and qualitative assessment components. Rigorous and fair qualitative assessment components will be 50% of the teachers’ and leaders’ evaluation ratings. Quantitative components will be the remaining 50% of the evaluation ratings. Districts will evaluate teachers and leaders at least on an annual basis, except for career teachers receiving a “superior” or
“highly effective” rating under TLE, who may be evaluated once every two years. Probationary teachers shall receive formal feedback from the evaluation process at least two times per year, once during the fall semester and once during the spring semester. This evaluation must provide feedback and opportunities for professional growth geared to improve student learning and outcomes.

Per TLE statute and OSBE policy (see Attachment 10B: Five-Tier Rating System Guidelines), evaluations shall include a five-tier rating system of the TLE Composite Score as follows:

1. Superior: 4.80-5.00,
2. Highly Effective: 3.80-4.79,
3. Effective: 2.80-3.79,
4. Needs Improvement: 1.80-2.79, and
5. Ineffective: 1.00-1.79.

**Qualitative Component** (See Attachment 10C: Qualitative Guidelines)

The qualitative component for teachers includes observable and measurable characteristics of personnel and classroom practices that are correlated to student performance. This assessment must be research-based, utilizing national best practices and methodology. Examples of observable and measurable characteristics include, but are not limited to:

- Organizational and classroom management skills,
- Demonstrations of effective instruction,
- Evidence of continuous improvement,
- Interpersonal skills, and
- Leadership skills.

Similar to the qualitative component for teachers, the qualitative component for leaders must also be research-based, incorporating national best practices and methodology. Examples of observable and measurable characteristics for leaders include, but are not limited to:

- Demonstrations of organizational and school management,
- Instructional leadership,
- Professional growth and responsibility,
- Interpersonal skills,
- Leadership skills, and
- Stakeholder perceptions.

**Quantitative Components**

The quantitative components of the TLE will compromise the remaining 50% of the teachers’ and leaders’ ratings. The TLE further dissects the quantitative portion into two categories: Other Academic Measures (OAMs) and Student Academic Growth (SAG).

**OAMs** (See Attachment 10D: Other Academic Measure Guidelines): Fifteen percent of the TLE Composite Score will be based on other academic measurements. OAMs are additional alternative instruments that ensure a robust teacher evaluation and capture unique facets of effective teaching. OAMs reflect student academic performance (achievement or growth) as impacted by the teacher. Teachers make the annual selection of the OAM from an OSBE-approved list, and district leaders determine appropriateness of the OAM based on relevance to job duty and actionable feedback.

**SAG**: Thirty-five percent of the overall ranking will be based on student academic growth using multiple
years of standardized assessment data (as available).

**Value-Added Model (VAM) for Teachers and Leaders of Tested Grades and Subjects** (See Attachment 10E: Value-Added Model Guidelines): Student academic growth for teachers and leaders of tested grades and subjects will be determined by value-added estimates, where possible. VAM is a sophisticated collection of complex statistical techniques that use multiple years of students’ test score data and other student characteristics to estimate the effects of individual schools or teachers.

**Student Learning Objectives (SLOs)/Student Outcome Objectives (SOOs) for Teachers and Leaders of Non-Tested Grades and Subjects (NTGS) and Teachers and Leaders for Whom a Value-Added Estimate Cannot Be Made** (See Attachment 10F: SLO/SOO Guidelines): Student Academic Growth for teachers and leaders who do not receive Value-Added Estimates will be determined by SLOs/SOOs. SLOs/SOOs are measurable instructional goals established for a specific group of students over a set period of time.

**Timeline**

By statute, full implementation will begin in the 2015-2016 school year based on student academic achievement/growth data collected in 2014-2015.

- During the 2012-2013 School Year, all districts piloted the qualitative component for both teachers and leaders.
- During the 2013-2014 School Year, all districts implemented the qualitative component; piloted the Other Academic Measures student achievement/growth data collection process; and received VAM reports based on 2012-2013 student growth data.
- During the 2014-2015 School Year, all districts will implement the qualitative component; will gather student achievement/growth data for Other Academic Measures that will be used in the 2015-2016 evaluations; will gather data for the Student Academic Growth component – both VAM and SLOs/SOOs – that will be used in the 2015-2016 evaluations; and will receive VAM reports based on 2013-2014 student growth data.
- During the 2015-2016 School Year, all districts will implement all three components: qualitative, OAM (using data from the 2014-2015 School Year), and VAM/SLO/SOO (using data from the 2014-2015 School Year). Additionally, all districts will gather student achievement/growth data for Other Academic Measures and Student Academic Growth (VAM/SLO/SOO) that will be used in the 2016-2017 evaluations.

**II. Evidence of the Adoption of Guidelines**

Attachments 11A-J include signed legislation related to TLE and State Board Minutes from each meeting in which action was taken regarding the adoption of TLE guidelines.

**III. Description of the Process**
In order to implement this process, 70 O.S. § 6-101.17 created the TLE Commission. This Commission includes the Superintendent of Public Instruction (Chairperson), members of the State Senate and House of Representatives, and a representative from the Office of the Governor. In addition, the Commission consists of representatives from the Oklahoma Commission for Teacher Preparation, Career and Technology Education, higher education, local school boards, superintendent organizations, local businesses, teachers’ unions, parent-teacher organizations, philanthropic organizations, and an individual involved in STEM (Science, Technology, Engineering and Mathematics) education. State law requires the TLE Commission to meet regularly through June of 2016. Their role is to continue to shape the TLE process in Oklahoma by offering recommendations to the Oklahoma State Board of Education (OSBE) regarding details of implementation, viable quantitative and qualitative measures of teacher and leader effectiveness, and monitoring of district compliance. The TLE Commission meets monthly in order to continue this work.

Educator Input

Two of the statutory charges of the TLE Commission are:

- Assuring input and participation from teachers and leaders on the development and implementation of the TLE;
- Gathering public comment on the development and effectiveness of the TLE.

To accomplish these tasks, the TLE Commission initially instituted a cycle of hearing testimony from educators, making preliminary recommendations that were circulated for public comment, and reviewing the comments before finalizing their recommendations to the OSBE. For example, the preliminary recommendations of the TLE Commission related to the qualitative component were distributed for public comment in the fall of 2011. The SEA presented the results of the public comment feedback loop, which were discussed in depth at each subsequent meeting until the TLE Commission finalized their recommendations to the OSBE on the qualitative component. In the fall of 2011 alone, 1,166 teachers, administrators, and members of the community participated in the public comment survey process to give feedback regarding the TLE.

As the work of the TLE Commission became increasingly more technical and complex, the Members voted to convene working groups composed of Commission Members, administrators, special education teachers, and other educators to study the details of various aspects of the quantitative components and to submit suggestions to the TLE Commission (see Attachment 23). In essence, these suggestions served as both preliminary recommendations and public comment on them.

**Working Group #1** specifically studied the **OAM** category of the quantitative components. This group, composed of approximately 60 members, submitted suggestions to the TLE Commission in the fall of 2012. The TLE Commission submitted formal recommendations to the OSBE who approved the recommendations in December 2012.

**Working Group #2** specifically studied the **SAG** quantitative component for teachers and leaders of **NTGS**. This group, composed of more than 250 members, submitted suggestions to the TLE Commission in the spring of 2013. As a result of new information and experiences from other states and districts, many members of this group reconvened in early 2014 to revise their original recommendations. Suggestions were presented to the TLE Commission in February 2014 and were submitted as formal recommendations to the OSBE who approved the recommendations in March 2014.
Working Group #3 specifically studied the SAG quantitative component for teachers eligible for VAM reports. This group, composed of approximately 100 members, submitted suggestions to the TLE Commission in the fall of 2013 and early 2014.

Additionally, a Value-Added Technical Advisory Board was established and convened on December 4, 2013, to focus on the development of the value-added model for Oklahoma, the ramifications of using state end-of-grade and end-of-course assessments for the value-added models, and the consequences of providing detailed output on value-added results to teachers. In addition to participation in the meeting, members were asked to provide input in reviewing the VAM technical reports, communications/training materials, and future teacher reports. Members of the Advisory Board consisted of both state and national participants who represented various policy-oriented and/or academic backgrounds.

The Advisory Board’s recommendations were presented—in conjunction with Working Group #3’s suggestions—to the Commission in the winter of 2013-2014. The TLE Commission submitted formal recommendations to the OSBE who approved the recommendations in December 2013 and January 2014.

Using Data to Inform System Development and Refinement

Data are collected at various times during each school year on the use of the TLE system components. This information is shared with the TLE Commission and OSBE in both aggregated and disaggregated formats. Recommendations based on the data are made regarding the System’s effectiveness in supporting the SEA’s Educator Effectiveness Theory of Action. As mentioned previously, one of the commitments of the SEA is seeking ongoing feedback to improve the System and professional development opportunities provided. (See Attachments 24-27: Oklahoma TLE Selection Survey, Tulsa TLE Observation and Evaluation System Correlation Research, Feedback to the TLE Commission and State Board of Education Regarding Qualitative Pilot, and Oklahoma TLE Needs Assessment Survey.)

The SEA is also involved in the critical activity of assisting LEAs by pairing their educators with customized professional learning opportunities to help them improve. One strategy the SEA employs is the development of Ed-Fi Dashboards for TLE. Ed-Fi Dashboards, discussed in Section 1.B, provide educators with real-time data about their students and their teaching. Another strategy is cataloging SEA-provided professional development based on the indicators of the frameworks approved for the qualitative component. By connecting learning modules, such as those provided through PD On Your Plan (see Attachment 30) also discussed in Section 1.B, with TLE indicators, the SEA can offer teachers and leaders components of their personalized professional growth plans in an effective and efficient manner.
Key Take Away for Section 3.A: Oklahoma is poised for implementation of a Teacher and Leader Effectiveness Evaluation System (TLE) that will encourage continuous improvement of all educators so that all teachers and leaders will have the opportunity to become effective, highly effective, or superior.
<table>
<thead>
<tr>
<th>Key Milestone or Activity</th>
<th>Detailed Timeline</th>
<th>Party or Parties Responsible</th>
<th>Evidence (Attachment)</th>
<th>Resources (e.g., staff time, additional funding)</th>
<th>Significant Obstacles</th>
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<tbody>
<tr>
<td>TLE Commission’s determinations regarding the qualitative frameworks as well as initial recommendations for the quantitative portions of the TLE System</td>
<td>December 5, 2011</td>
<td>TLE Commission</td>
<td></td>
<td>Executive Director of TLE whose primary duty is to gather data, resources, and other information to guide the Commission’s decision.</td>
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<td>The State Board of Education’s approval of the qualitative framework options and quantitative components based on the Commission’s recommendations</td>
<td>December 15, 2011</td>
<td>The State Board of Education</td>
<td>See 70 O.S. § 6-101.16 (Attachments 10 and 11)</td>
<td>Assistant State Superintendent of Educator Effectiveness along with the Executive Director of TLE presented the recommendation(s) of the Commission.</td>
<td></td>
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<tr>
<td>Implementation of a qualitative framework pilot</td>
<td>2012-2013 school year</td>
<td>The SEA in conjunction with all LEAs</td>
<td></td>
<td>The Assistant State Superintendent of Educator Effectiveness, Executive Director of TLE, framework trainers, software programmers, and LEA staff</td>
<td>Teachers and administrators spent significant time away from the classroom and/or campus to attend training and other professional development.</td>
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<td>Research regarding the thirty-five percentage points based on VAM results</td>
<td>Fall 2011 – Spring 2014</td>
<td>The State Department of Education in conjunction with volunteer Oklahoma educators, and a VAM Technical Advisory Board comprised of local and national experts</td>
<td>The Assistant State Superintendent of Educator Effectiveness, Executive Director of TLE, volunteer Oklahoma educators</td>
<td>Significant time</td>
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<td>The Commission’s recommendations and the State Board’s approval of the Value-Added Model (VAM)</td>
<td>Fall 2013-Spring 2014</td>
<td>The TLE Commission and the State Board of Education (Attachments 10 and 11)</td>
<td>The Assistant State Superintendent of Educator Effectiveness and Executive Director of TLE</td>
<td>Significant time</td>
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<td>Research regarding addressing those teachers and leaders in grades and subjects for which there is no state-mandated testing measure to create a Value-Added Result</td>
<td>Spring, Summer, Fall 2012; 2013; 2014</td>
<td>The State Department of Education in Conjunction with volunteer Oklahoma educators</td>
<td>The Assistant State Superintendent of Educator Effectiveness, Executive Director of TLE, and volunteer Oklahoma educators</td>
<td>Significant time</td>
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<td>Lack of Information</td>
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<td>The Commission’s recommendations and the State Board’s approval for SLOs/SOOs for teachers and leaders for whom a Value-Added Result cannot be created</td>
<td>Spring 2014</td>
<td>The TLE Commission and the State Board of Education (Attachments 10 and 11)</td>
<td>The Assistant State Superintendent of Educator Effectiveness and the Executive Director of TLE</td>
<td>Significant time</td>
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<td>Research regarding the fifteen percentage points based on other academic measures</td>
<td>Spring, Summer, Fall 2012</td>
<td>The State Department of Education in Conjunction with volunteer Oklahoma educators</td>
<td>The Assistant State Superintendent of Educator Effectiveness, Executive Director of TLE, and volunteer Oklahoma educators</td>
<td>Significant time</td>
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<td>The Commission’s recommendations and the State Board’s approval of OAM</td>
<td>Fall 2012</td>
<td>The TLE Commission and the State Board of Education (Attachments 10 and 11)</td>
<td>The Assistant State Superintendent of Educator Effectiveness and Executive Director</td>
<td>Significant time</td>
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<td>policies</td>
<td>2015-2016 school year, based on student academic growth data from 2014-2015</td>
<td>The State Department of Education in conjunction with all LEAs within the State</td>
<td>See 70 O.S. § 6-101.10 (Attachments 10 and 11)</td>
<td>The Assistant State Superintendent of Educator Effectiveness, Executive Director of TLE, framework trainers, software programmers, and district staff</td>
<td>Significant time will be spent in training administrators and teachers.</td>
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<td>Full implementation of the framework</td>
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<td>Ongoing evaluation of the System</td>
<td>Annually</td>
<td>TLE Commission</td>
<td>See 70 O.S. § 6-101.17 (Attachments 10 and 11)</td>
<td>Commission members, The Assistant State Superintendent of Educator Effectiveness, Executive Director of TLE, Assistant State Superintendent of Assessment and Accountability, Regional Accreditation Officers, and Executive Director of Student Information</td>
<td>Data collection, data analysis, fidelity of implementation, and use of data to assess and increase educator effectiveness</td>
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3.B ENSURE LEAS IMPLEMENT TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

3.B Provide the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA’s adopted guidelines.

By the 2015-2016 school year, each school district in the State must adopt a teacher and principal evaluation policy based on the statewide TLE System. Regional Accreditation Officers assigned to each LEA will audit documents and teacher records to determine if each LEA has implemented the TLE System for evaluation purposes. In addition, data generated through the TLE will be submitted to the SEA annually and analyzed for trends.

LEAs, as well as the SEA, will use the data generated from the TLE to drive a multitude of educational decisions (See Attachment 10A: Oklahoma Statutes Related to TLE).

- 70 O.S. § 5-141.4 permits a district to implement an incentive pay plan based on teacher performance that rewards teachers who increase student and school growth. Among other requirements, teachers and leaders must achieve either a “superior” or “highly effective” rating under TLE and demonstrate grade level, subject area, or school level performance success to qualify for the incentive pay.
- 70 O.S. § 6-101.3 requires career teacher status to be awarded based on TLE ratings.
- 70 O.S. § 6-101.13 requires that administrator non-reemployment decisions be based on TLE ratings.
- 70 O.S. § 6-101.16 requires that a comprehensive remediation plan as well as instructional coaching be provided to all teachers rated as needs improvement or ineffective.
- 70 O.S. § 6-101.22 requires that teacher non-reemployment decisions be based on TLE ratings.
- 70 O.S. § 6-101.31 requires Reduction in Force policies to use teacher effectiveness as the primary basis for releasing teachers.

Alignment between TLE ratings and student test scores will be reviewed and monitored by the SEA and the TLE Commission. Significant discrepancies will be addressed through the State’s newly adopted Differentiated Recognition, Accountability, and Support System as discussed in Section 2.A.

Key Take Away for Section 3.B: The Oklahoma TLE is designed to be an integral part of the entire school improvement process. The evaluation of teachers and leaders will once again have meaning since the results of evaluations will be used for all varieties of data-based decisions at the classroom, building, LEA, and SEA levels.