Proposed Additions, and other Revisions, to Requirements for "Transformation Model," as contained in Notice of Proposed Requirements, School Improvement Grants, 74 F.R. 43109-10 (Aug. 26, 2009), and to Related Turnaround Requirement of "Blueprint"

## I. Proposed Additions to "Transformation Model"

# A. <u>I.A.1.d.(i)(A)(1)</u>

Add provisions to this subsection so that it reads, in its entirety, as follows:

"Use evaluations that *include* measure of student growth, drawn from multiple sources of evidence of various types, including substantial reliance on performance assessments, which evaluations are designed primarily to help educators improve, and in which scores from large-scale tests play a very small part,\* to improve teachers' and school leaders' performance."

# B. <u>I.A.1.d.(i)(A)(2)</u>

Add provisions to this subsection so that it reads as follows:

"After the LEA, having designed a program of professional development as described in subsection I.A.1.d.(i)(A)(4) that meets student learning needs identified by school staff, has provided ongoing, high quality, job-embedded professional development, as described in subsection I.A.1.d.(i)(A)(4) below, for at least three years, identify and reward such trained school leaders, teachers, and other instructional staff who improve student achievement outcomes, based on multiple sources of evidence of various types, including substantial reliance on performance assessments, and remove, in compliance with all applicable due process procedures, such trained staff who do not;"

C. <u>I.A.1.d.(i)(A)(3)</u>

Similarly add provisions to this subsection:

"Replace any principal: who led the school *for at least three years* prior to commencement of the transformation model; *for whom the district provided the necessary support*; who has been evaluated and identified as a significant reason for the school's low performance and lack of progress; and for whom a well qualified replacement is available."

# D. I.A.1.d.(i)(A)(4) sixth line

Immediately after "the school," insert "and/", so that the phrase reads: "instruction that

\*Proposed additional and revised language has been put in italics.

reflects a deeper understanding of the community served by the school, *and/*or differentiated instruction)...."

E. <u>I.A.1.d.(i)(A)(5)</u> Renumber the current I.A.1.d.(i)(A)(5) as I.A.1.d.(i)(A)(10), and add the following as the new subsection I.A.1.d.(i)(A)(5):

"Provide intensive mentoring for all beginning teachers, as well as frequent mentoring for all experienced teachers who are not yet highly effective in teaching a challenging curriculum to diverse learners, that meets the teachers' individual instructional needs."

F. <u>I.A.1.d.(i)(A)(6)</u> Add the following as a new subsection I.A.1.d.(i)(A)(6):

"Create and fill a sufficient number of positions as mentor teachers/coaches to provide mentors for all teachers required by subsection  $d_i(i)(A)(5)$  above, as well as a number of positions for professional development specialists, curriculum developers, subject matter coordinators, literacy coaches and/or other specialized skill sets sufficient to strongly support teachers throughout the school transformation process."

G. <u>I.A.1.d.(i)(A)(7)</u> Add the following as a new subsection I.A.1.d.(i)(A)(7):

"Provide intensive training for school staff on how to encourage and support families and communities to contribute to their children's academic and behavioral development, involving parents in designing and providing such training."

H. <u>I.A.1.d.(i)(A)(8)</u>

Add the following as a new subsection I.A.1.d.(i)(A)(8):

"Provide training in instructional leadership skills for school administrators, teachers, and pupil services personnel to enable them to create supportive learning communities to improve instruction, produce effective professional development and engage families in their children's education."

I. <u>I.A.1.d.(i)(A)(9)</u>

Add the following as a new subsection I.A.1.d.(i)(A)(9):

"Increase and enhance specialized instructional support personnel/services (currently known as 'pupil services') to address barriers to student success through direct services to students and supports to teachers and administrators;"

#### J. <u>I.A.1.d.(ii)(A)(2)</u>

Add provisions to this subsection so that it reads:

"Promote the continuous use of individualized student data, *including performance tasks and projects* (such as from formative, interim, and summative assessments), *taking into account the needs of diverse learners by employing tools such as universal design for learning*, to inform and differentiate instruction to meet the needs of individual students."

K. <u>I.A.1.d.(ii)(A)(3)</u>

Add a new subsection I.A.1.d.(ii)(A)(3) as follows:

"Provide extensive professional development for teachers to learn how to prepare and use assessments to identify students' academic strengths and weaknesses and address their learning needs ('formative assessments');"

L. <u>I.A.1.d.(ii)(A)(4)</u> Add a new subsection I.A.1.d.(ii)(a)(4) as follows:

"In any State operating, or participating in a consortium of States operating, a federally-approved school quality review (SQR)/inspectorate program, have the school periodically evaluated by the SQR and implement its recommendations for school improvement to the maximum extent possible that is not inconsistent with legal and contractual obligations."

#### M. <u>I.A.1.d.(iii)(A)(2)</u>

Add provisions to this subsection so that it reads as follows:

"Provide more time for teachers to collaborate *during the school day*, including time for horizontal *planning to collectively analyze individual students' learning needs and design appropriate instruction, develop lesson plans, and introduce and discuss research relevant to meeting team members' pedagogical needs*, and vertical planning *to align curriculum between grades, so as* to improve instruction."

#### N. <u>I.A.1.d.(iii)(A)(4)</u>

Add provisions to this subsection so that it reads as follows:

"Provide ongoing mechanisms for family and community engagement, *including* programs to provide parenting skills and adult literacy to enable all parents of the school's students to better assist their children's learning at home, adult mentoring programs for all the school's students without families available to provide such support, programs to engage the parents and families to participate in parent-teacher conferences, other school-related activities and school policy-making and reform, and public reporting of the school's progress in implementing parent support and involvement policies."

#### O. <u>I.A.1.d.(iii)(B)(3)</u>

Renumber the current subsection I.A.1.d.(iii)(B)(3) as I.A.1.d.(iii)(A)(4), so that it is converted from a "permissible" to a "required" activity.

#### P. <u>I.A.1.d.(iv)(A)(1)</u>

Renumber the current subsection I.A.1.d.(iv)(A)(1) as I.A.1.d.(iv)(A)(3) and add the following as the new I.A.1.d.(iv)(A)(1):

"Prepare, in collaboration with parents, teachers, and other school staff, a brief action plan, tailored to the needs of the school, for how to implement all "required activities" in subsection I.A.1.d. and such other policy and/or program changes as may be needed to improve students' learning and close the achievement gap, including incorporating recommendations that the school may receive from a school quality review pursuant to subsection I.A.1.d.(ii)(A)(4), above, and implement those improvements in a coherent sequence.

#### Q. <u>I.A.1.d.(iv)(A)(5)</u>

Add a new subsection I.A.1.d.(iv)(A)(5) as follows:

"Prepare, and make available to the public annually, a report describing the major steps taken to implement each of the systemic improvements required in subsections I.A.1.d.(i)(A)(4)-(8), I.A.1.d.(iii)(A)(2) and I.A.1.d.(iii)(A)(4), other major reform initiatives undertaken, the obstacles encountered, actions taken to overcome them, and the results of implementing the initiatives, identified separately to the extent feasible, as well as disaggregated student assessment results from multiple sources of evidence."

## **II. Proposed Revisions to School Improvement Grants Generally**

A. <u>II.A.2.  $12^{\text{th}}$ - $16^{\text{th}}$  lines</u> Remove the restriction that:

"If an LEA has nine or more Tier I and Tier II schools, the LEA may not implement the same intervention in more than 50 percent of those schools."

#### B. <u>II.B.1.</u>

Insert at the end of this subsection the following:

"This application may include a plan for establishing a state-level school quality review ("SQR")/inspectorate, to be operated by the State or a consortium of States, that: (1) would provide a corps of independent, skilled and experienced educators to periodically evaluate and report on the instructional program, academic achievement, demographics, school climate, resources and other conditions in individual Title I-funded schools; (2) evaluate first, and more frequently, schools having particular difficulty, as shown by persistent failure to significantly improve

student learning and/or to effectively implement systemic improvements; (3) analyze school's strengths and problems; (4) recommend solutions and outside assistance, and, for schools in serious trouble, possible major interventions; and (5) issue a written report of its findings, conclusions and recommendations to the public. As a pilot program to help improve Title I-funded schools, the federal government will pay \_\_\_\_ percent of the cost of operating such a program for a maximum of fourteen States for five years, with the States responsible for funding the remainder of the cost. In addition to School Improvement, Race to the Top, and Title I grants which may be used for implementing SOR recommendations, the government will make available *s million per year to the SOR pilot States to assist in implementing such* recommendations.

#### III. Proposed Revision to a "Blueprint" Requirement for All Turnaround Models

<u>"Blueprint," p. 10, 2<sup>nd</sup> paragraph, 7<sup>th</sup> line</u> Strike the "." after "to support better outcomes for students" and insert immediately thereafter the following:

", but this requirement to implement a turnaround model shall only apply to any school in any year for which federal funds have been appropriated and provided to that school in an amount the Department has determined, by formula, is needed to turn around a school of that size, type and location."

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