

ESEA FLEXIBILITY PART B MONITORING REPORT

MONITORING VISIT INFORMATION	
State Educational Agency (SEA)	Kentucky Department of Education [KDE]
Request Approved	February 9, 2012
Request Amended	September 28, 2012
ESEA Flex Monitoring Activity	Part B (Desk Monitoring)
Monitoring Review Date(s)	August 27 – September 3, 2013
Exit Conference	November 13, 2013
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OVERVIEW OF ESEA FLEXIBILITY MONITORING

The U.S. Department of Education (ED) is committed to supporting State educational agencies (SEAs) as they implement ambitious reform agendas through their approved ESEA flexibility requests. Consistent with this commitment, ED has designed a monitoring process to assess an SEA’s implementation of the principles of ESEA flexibility and the State-level systems and processes needed to support that implementation.

Part B Monitoring

In Part B monitoring, SEA implementation of ESEA flexibility was reviewed across several key areas: State-level Systems and Processes, Principle 1, Principle 2, and Principle 3, as outlined in the *ESEA Flexibility Part B Monitoring Protocol*. In each broad area, ED identified key elements that are required under ESEA flexibility and are likely to lead to increased achievement for students. Through examination of documentation submitted by the SEA and interviews with SEA staff, ED assessed the effectiveness of implementation of ESEA flexibility by identifying the extent to which an SEA:

1. Is ensuring that implementation is occurring consistent with the SEA’s approved request and the principles and timelines of ESEA flexibility.
2. Is continuing to review and make adjustments to support implementation.
3. Is establishing systems and process to sustain implementation and improvements.

The report contains the following sections:

- *Highlights of the SEA's Implementation.* This section identifies key accomplishments in the SEA's implementation of ESEA flexibility.
- *Status of Implementation of ESEA Flexibility.* This section indicates whether or not the SEA has met expectations for each element of ESEA flexibility.
- *Elements Requiring Next Steps.* When appropriate, this section identifies any elements where the SEA is not meeting expectations and includes Next Steps that the SEA must take to meet expectations.
- *Recommendations to Strengthen Implementation.* This section provides recommendations to support the SEA in continuing to meet the principles and timelines of ESEA flexibility and strengthening implementation.
- *Additional Comments.* When appropriate, this section includes any additional information related to the SEA's implementation of ESEA flexibility not included elsewhere.

HIGHLIGHTS OF IMPLEMENTATION OF ESEA FLEXIBILITY

The SEA's work includes the following key accomplishments relating to the implementation of ESEA flexibility and/or efforts to engage in a process of continuous review and analysis, particularly for those elements receiving a comprehensive review:

- The KDE has developed and implemented an overarching and comprehensive management structure (called "delivery") for Unbridled Learning, the KDE's plan for ensuring that every child reaches his/her learning potential and graduates from high school college- and career-ready. The KDE also has integrated Unbridled Learning with Kentucky's approved ESEA flexibility request. The KDE currently has four delivery plans, one for each of the overarching Unbridled Learning goals (college- and career-readiness, proficiency, achievement gap and next-generation professionals). For each delivery plan, there are 1-4 outcomes-based overarching targets; several specific strategies to impact the targets; and, for each strategy, a lead staff person, milestones for each school year, and indicators. The KDE tracks work and progress on the strategies, reviews the status updates at regular staff-level and leadership meetings, and uses the updates as the basis for action planning. As a result of this structure, the KDE has aligned and coordinated its school improvement efforts from the school level through the Commissioner level.
- Regarding data collection and use, the KDE has put in place and integrated multiple resources that support collection and use of data for school improvement, including: the Kentucky Student Information System (KSIS)/Student Data System (SDS); Kentucky's online school, district and state report card system for State assessment and accountability data; the Continuous Instructional Improvement Technology System (CIITS), through which educators can access Kentucky's academic standards, aligned instructional resources, data, reports, and various tools; and ASSIST, Kentucky's school and district planning tool that also incorporates use of data into school and district planning. At the SEA level, the KDE also is using data to track and report progress (statewide and by district) on the KDE's four overarching Unbridled Learning goals.

STATUS OF IMPLEMENTATION OF ESEA FLEXIBILITY

SEA Systems & Processes

Element	Status
Monitoring (EDGAR 80.40 and 2.G)	Not Meeting Expectations
Technical Assistance (2.G)	Not Meeting Expectations
Data Collection & Use (§9304(a)(6))	Meeting Expectations
Family & Community Engagement and Outreach (Implementation Letter)	Meeting Expectations

Principle 1

Element	Status
Transition to and Implement College- and Career-ready Standards (1.B)	Meeting Expectations
Adopt English Language Proficiency Standards (Assurance 2)	Meeting Expectations
Develop and Administer High-Quality Assessments (Assurance 3)	Not Meeting Expectations
Develop and Administer Alternate Assessments (Assurance 3)	Meeting Expectations
Develop and Administer English Language Proficiency Assessments (Assurance 4)	Meeting Expectations
Annually Reports College-going and College-credit Accumulation Rates (Assurance 5)	Meeting Expectations

Principle 2

Element	Status
Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (2.A)	Meeting Expectations
Reward Schools (2.C)	Meeting Expectations
Priority Schools (2.D)	Meeting Expectations
Focus Schools (2.E)	Not Meeting Expectations
Other Title I Schools (2.F)	Meeting Expectations
State and Local Report Cards (§1111 of the ESEA; 2.B and Assurance 14)	Not Meeting Expectations

Principle 3

Element	Status
Teacher Evaluation and Support Systems (3.B)	Meeting Expectations
Principal Evaluation and Support Systems (3.B)	Meeting Expectations

ELEMENTS REQUIRING NEXT STEPS

Element	Monitoring
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled ESEA Flexibility. Specifically, the SEA is required to monitor the implementation of LEA- and school-level ESEA flexibility activities in focus schools. The KDE has not fully implemented a process for monitoring the implementation of LEA- and school-level ESEA flexibility activities in focus schools and for ensuring that LEAs implement interventions for each focus school that target the reason(s) the school was identified. Through ASSIST, the KDE has ensured that all focus schools have developed school improvement plans. The KDE indicated that, following focus school identification, consultants assigned to each school were told to ensure that focus schools updated their plans as needed. The KDE has not formally tracked whether all focus schools have plans that include interventions for each focus school that target the reason(s) the school was identified, and the KDE has not ensured that interventions that target the reason(s) the school was identified are implemented in each focus school.</p>
<p>Next Steps</p>	<p>Through the ESEA flexibility Extension process the KDE will submit to ED evidence that it has confirmed that the CSIP for each focus school includes the implementation of interventions that target the reason(s) the school was identified.</p>

Element	Technical Assistance
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled ESEA Flexibility. The SEA must provide guidance and technical assistance to LEAs and schools related to ESEA flexibility activities. While the SEA is providing guidance and technical assistance to LEAs and schools related to ESEA flexibility Principle 1 and Principle 2 activities in general, multiple key components of the KDE's implementation do not incorporate strategies to meet the unique needs of students with disabilities and English learners. Such exclusion ranges, for example, from key strategies (e.g., across delivery plans) to more focused components (e.g., Education Recovery Staff Job Description, 30/60/90 day plan template).</p>
<p>Next Steps</p>	<p>Through the ESEA flexibility Extension process the KDE will amend its approved ESEA flexibility request to more fully reflect how the KDE will integrate and implement activities under Principle 1 and Principle 2 to address the unique needs of students with disabilities and English learners in its implementation of ESEA flexibility.</p>

Element	Develop and Administer High-Quality Assessments
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request. Under ESEA flexibility, the SEA must develop and administer (no later than the 2014–2015 school year) annual, statewide, aligned high-quality assessments, and corresponding achievement standards, that measure student growth in at least grades 3-8 and at least once in high school. To meet this requirement, the KDE’s approved ESEA flexibility request states that the KDE is a participating state in both the SBAC and PARCC and incorporates in its approved ESEA flexibility request its memoranda of understanding with these consortia, including indications that it will field test the assessment systems and tools developed by PARCC. In contrast, the KDE indicated during monitoring that that it is no longer a member of SBAC and that “Kentucky is monitoring the development of the consortia tests and will evaluate the tests after the first operational administration. At this time there is not a timeline to adopt the PARCC assessments.”</p>
<p>Next Steps</p>	<p>Through the ESEA flexibility Extension process the KDE will amend its approved ESEA flexibility request to reflect its current plans for administering (no later than the 2014–2015 school year) annual, statewide, aligned high-quality assessments, and corresponding achievement standards.</p>

Element	Focus Schools
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>. Specifically, the SEA also has not demonstrated that: “the plans of focus schools will be monitored by cross-functional teams of KDE staff who will review the submissions, assess levels of implementation and recommend new or revised interventions as needed” (p. 78) and that LEAs will be required to assist focus schools with their needs assessments and CSIPS, and be “primarily responsible for the compliance of their [focus] schools” (pp. 77 & 78).</p>
<p>Next Steps</p>	<p>Regarding the activities noted in the focus school summary and status of implementation above, the KDE will submit to ED evidence of how it is implementing the activities consistent with its approved ESEA flexibility request or amend its approved ESEA flexibility request to reflect updated plans.</p>

Element	State and Local Report Cards
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>. State and local report cards must include: participation rates for subgroups, including whether participation rate goals were met by subgroups, and the percentage of core academic subject classes not taught by highly qualified teachers disaggregated by high- and low-poverty schools.</p>

Element	State and Local Report Cards
	The KDE has not reported the participation rate data noted above for male, female and migrant subgroups, and the KDE also has not reported the percentage of core academic subject classes not taught by highly qualified teachers disaggregated by high- and low-poverty schools.
Next Steps	Within 30 business days, the KDE will either revise its report cards to include the data noted in the finding, or submit to ED a plan (including templates) and timeline for reporting the data with report cards based on 2013-14 assessment results. If the KDE submits a plan and a timeline, the KDE also shall notify ED when report cards based on 2013-14 assessment data that include the missing data are posted on its report card webpage.

RECOMMENDATIONS TO STRENGTHEN IMPLEMENTATION

The following recommendations are provided to support the SEA in continuing to meet the principles and timelines of ESEA flexibility and strengthening implementation through continuous improvement and the establishment of systems and processes to sustain implementation and improvement.

- ED recommends that, in planning for ESEA flexibility extension, the KDE plan to augment its approach to identifying other Title I schools that are not making progress in improving student achievement and narrowing gaps based on AMOs and providing supports and incentives to these schools. In addition, ED recommends that the KDE augment its procedures so that has in place procedures to ensure, on an ongoing basis, that all other Title I schools that are not making progress in improving student achievement and narrowing gaps based on AMOs, graduation rates, and other measures have completed CSIPs.
- While the KDE provided evidence that it had taken several steps to support implementation of English language proficiency standards that correspond to the State’s college- and career-ready standard, evidence was limited that the KDE has communicated to all districts that implementation of these standards is required for all ELs. ED recommends that the KDE annually communicate directly to district personnel and through key documents regarding serving ELs the requirement to teach all ELs to these standards, and that such communication address both Title III districts and all non-Title III districts that serve ELs.
- The KDE has developed a CSIP/CDIP Plan Review Rubric that it will require priority schools to use for self-assessment beginning in 2013-14. To strengthen the KDE’s monitoring and technical assistance for focus schools and other Title I schools that are not making progress in improving student achievement and narrowing achievement gaps, it is recommended that the KDE considering requiring the use of this tool for such schools and/or using the tool as a part of the KDE’s consolidated monitoring. Regarding the rubric, it is also recommended that the KDE strengthen the rubric by increasing the degree to which it focuses on needs, supports and interventions for particular subgroups (as opposed to all students and the student gap group), including more explicitly addressing the unique needs of students with disabilities and ELs.