

ESEA FLEXIBILITY PART B MONITORING REPORT

MONITORING VISIT INFORMATION	
State Educational Agency (SEA)	Alabama State Department of Education (ALSDE)
Request Approved	June 21, 2013
Request Amended	September 19, 2014
ESEA Flex Monitoring Activity	Onsite Monitoring
Monitoring Review Date(s)	December 17-18, 2014
Exit Conference	January 26, 2015
Interviews Conducted	Dr. Thomas Bice, Mrs. Sherrill Parris, Dr. Melinda Maddox, Mrs. Shanthia Washington, Dr. Julie Hannah, Dr. Philip Cleveland, Dr. Mark Kirkemier, Dr. Linda Felton-Smith, Mrs. Rebecca Mims, Mr. Edmund Moore, Ms. Crystal Richardson, Mrs. Maggie Hicks, Ms. Lori Boyd, Ms. Gay Finn, Mrs. Cyndi Townley, Mr. Dom Martel, Mrs. Phyllis Montalto, Mrs. Ann Allison, and Mr. Joe Eiland
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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, and Principle 2. The State's Principle 3 guidelines underwent peer review in fall 2014 and as a result additional information was not collected regarding the State's implementation of Principle 3 during this monitoring event. 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 processes 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.

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:

- Conversations with ALSDE staff highlighted that its work transitioning to new standards and high-quality assessments focuses not just on ensuring that students are college-ready, but also career-ready. Staff from ALSDE's Career and Technical Education division have been closely involved in the planning and transition processes and ALSDE collaborates with the business community to define career-ready benchmarks and assess students' career-readiness.
- To ensure that principals of priority schools have sufficient support to be strong leaders in turnaround environments, ALSDE has established a Principal Leadership Network which brings together priority school principals in two regional cohorts to receive training on and discuss particular topics relating to school turnaround and visit a school that is implementing strategies related to that topic. Based on the level of interest and participation in the program, as well as feedback from participants, it appears that this opportunity is providing targeted and valuable support for principals in low-performing schools in Alabama.
- Based on monitoring documentation and conversations with ALSDE staff members, it is evident that the State is making an effort to use data to inform decision-making and planning for future implementation. Comprehensive instructional audits, through which priority schools' areas of greatest need are identified, incorporate data and evidence; the State has provided local educational agencies (LEAs) with access to Global Scholar, a formative assessment tool, and encourages the use of formative assessment data to inform instruction; and ALSDE holds data-driven stocktakes that help it to assess progress toward major SEA objectives and inform plans for moving forward.

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)	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)	Not Meeting Expectations
Reward Schools (2.C)	Not Meeting Expectations
Priority Schools (2.D)	Not Meeting Expectations
Focus Schools (2.E)	Meeting Expectations
Other Title I Schools (2.F)	Not 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)	ALSDE's guidelines under review
Principal Evaluation and Support Systems (3.B)	ALSDE's guidelines under review

ELEMENTS REQUIRING NEXT STEPS

Element	Monitoring (EDGAR 80.40 and 2.G)
Summary and Status of Implementation	The SEA has not demonstrated that this element is carried out consistent with the principles and timelines outlined in the document titled <i>ESEA Flexibility</i> . As described in the document titled <i>ESEA Flexibility</i> , SEAs must “provide timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools and must hold LEAs accountable for improving school and student performance, particularly for turning around their priority schools.” As described in its approved ESEA flexibility request, ALSDE has implemented a local planning process and

Element	Monitoring (EDGAR 80.40 and 2.G)
	<p>regional support structure through which it intends to provide differentiated support and monitoring for LEA and school implementation of the State’s ESEA flexibility request. In its documentation and through monitoring conversations, ALSDE reported that its Regional Planning Teams (RPTs) and Regional Support Staff (RSS) serve as the primary means of monitoring implementation of ESEA flexibility, including monitoring in reward, priority, focus, and other Title I schools. Through RSS interactions with LEA and school staff members as well as RPT check-ins, ALSDE gathers information about local implementation of ESEA flexibility principles and progress against Continuous Improvement Plans (CIPs).</p> <p>However, it is not clear if or how the SEA is monitoring to ensure implementation of appropriate interventions, particularly in priority and focus schools. While ALSDE reported that CIPs would be expected to address interventions that meet Principle 2 of ESEA flexibility, no front-end review or approval process is in place to ensure that the plans established meet the expectations for implementation under ESEA flexibility. For example, the SEA is not ensuring that plans reflect all turnaround principles for priority schools, interventions aligned with the reasons for identification for focus schools, or missing annual measurable objectives (AMOs) for other Title I schools.</p> <p>Although monthly RPT check-ins with LEAs may provide insight into local implementation, these do not appear to be formal monitoring processes that would ensure the interventions for priority, focus, and other Title I schools meet the requirements of ESEA flexibility. While there are general expectations for the check-ins, there are no specific requirements or standards for how RPTs should monitor to ensure implementation is occurring as expected. Additionally, it is unclear how an LEA or school would be held accountable if it were found not to be implementing as expected. ALSDE does use a formal monitoring process (the comprehensive monitoring process) for all federal programs, but it is not clear how this process addresses the principles of ESEA flexibility.</p>
Next Steps	<p>Through the process for renewing the SEA’s ESEA flexibility request, ALSDE will make modifications to its approved request to describe its approach to monitoring LEA implementation of interventions in priority and focus schools to ensure that implementation of ESEA flexibility is consistent with the State’s approved request and the timelines and principles of ESEA flexibility.</p>

Element	Develop and Administer High-Quality Assessments (Assurance 3)
Summary and Status of Implementation	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request. According to ALSDE’s approved ESEA flexibility request, the SEA planned to administer in school year (SY) 2013-2014 QualityCore End-of-Course Assessments in English 9, 10, and 11, as well as Algebra I, Geometry, and Algebra II. However, the SEA indicated during monitoring interviews that its assessment plans have changed. The SEA provided documentation demonstrating that the SEA only administered</p>

Element	Develop and Administer High-Quality Assessments (Assurance 3)
	QualityCore assessments in English 10 and Algebra I during SY 2013-2014. The SEA explained that as a result of budget limitations it no longer plans to expand its administration of QualityCore assessments beyond English 10 and Algebra I. Additionally, in SY 2014-2015, the SEA's approved plan indicated that it would administer the Alabama Reading and Math Test (ARMT) Science assessment in grades 5 and 7. The SEA's monitoring documentation reflects that ALSDE no longer plans to administer the ARMT Science Assessment, but instead plans to administer the ACT Aspire Science assessment in Grades 5 and 7 during SY 2014-2015.
Next Steps	Through the process for renewing the SEA's ESEA flexibility request, ALSDE must update its request to describe ALSDE's plans for administering high-quality assessments. Additionally, the SEA's updated request should reflect its adjusted plan for administration of a science assessment for grades 5 and 7 in SY 2014-2015.

Element	Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (2.A)
Summary and Status of Implementation	The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request. According to ALSDE's approved request, the SEA would develop and implement a School/District Performance Index that would provide letter grades to all schools and eventually districts. The SEA's plan indicated that this system of differentiated recognition, accountability, and support would be implemented in two phases over a three-year period. Phase I, which would base the performance index score for schools on only three components (Achievement, Gap, and Attendance or Graduation Rate), would be in place for SY 2013-2014 with results announced in fall 2014. During monitoring interviews, the SEA indicated that while it calculated performance on the three components included in Phase I and determined total index scores for SY 2012-2013, and plans to do so for SY 2013-2014, it does not plan to make these publicly available or issue letter grades based on these scores, since SY 2013-2014 was the first year of using the new index and the first year of administering new assessments. ALSDE indicated that it does not intend to issue letter grades until 2016.
Next Steps	Through the process for renewing the SEA's ESEA flexibility request, ALSDE must either: <ul style="list-style-type: none"> • Provide evidence that it has already implemented Phase I of its State-based system of differentiated recognition, accountability, and support by issuing letter grades to its schools based on SY 2013-2014 results; or • Update its ESEA flexibility request to reflect ALSDE's adjusted plan for implementing its system of differentiated recognition, accountability, and support that meets the principles and timelines of <i>ESEA Flexibility</i>.

Element	Reward Schools (2.C)
Summary and Status of Implementation	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> . According to the document titled

Element	Reward Schools (2.C)
	<p><i>ESEA Flexibility</i>, an SEA must annually publicly identify and recognize its highest-performing and high-progress Title I Schools. ALSDE provided evidence that it identified and recognized its highest-performing Title I schools as “Torchbearer” schools for SY 2013–2014 (based on SY 2012-2013 data), consistent with its approved ESEA flexibility request. However, ALSDE has not identified and recognized high-progress Title I schools. ALSDE indicated during monitoring conversations that it plans to identify high-progress Title I schools in 2016.</p>
<p>Next Steps</p>	<p>Through the process for renewing the SEA’s ESEA flexibility request, ALSDE must revise its methodology for identifying reward schools to ensure that it identifies and recognizes high-progress reward schools on an annual basis beginning for SY 2015–2016 (based on SY 2013–2014 and SY 2014–2015 data), in addition to recognizing high-performing reward schools on an annual basis.</p>

Element	Priority Schools (2.D)
<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>. ESEA flexibility requires that priority schools implement interventions aligned with the turnaround principles no later than SY 2014-2015 and that priority schools implement meaningful interventions aligned with the turnaround principles for three years to ensure full and effective implementation. Although ALSDE indicated in its approved request that “full implementation of interventions aligned with the turnaround principles” would occur during SY 2014-2015, monitoring conversations indicated that this is not occurring. ALSDE staff reported that all priority schools are expected to implement interventions aligned with some, but not all, of the turnaround principles in SY 2014-2015. Each school is expected to implement interventions in SY 2014-2015 aligned to the turnaround principles identified during comprehensive instructional audits as needing the most attention. Based on this information, it is not clear that all schools implemented all of the turnaround principles in what is considered the first year of implementation according to ALSDE's approved ESEA flexibility request. To count as the first year of the three required years of full implementation, priority schools must implement all of the turnaround principles in that year.</p> <p>Additionally, ALSDE did not demonstrate that its priority schools reviewed the performance and qualifications of principals to make determinations regarding whether to keep or replace them, nor did the SEA have a process for LEAs who are retaining principals in priority schools to demonstrate to the SEA that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort. To be considered the first full year of implementation, this must have occurred.</p> <p>ALSDE staff indicated during monitoring conversations that the SEA uses the turnaround principles as guidelines for determining what intervention strategies</p>

Element	Priority Schools (2.D)
	<p>to utilize in priority schools. However, the SEA did not provide evidence that it is ensuring that its priority schools are implementing all of the turnaround principles as defined in the document titled <i>ESEA Flexibility</i>. Priority schools seem to be using the turnaround principles as general guidelines upon which to build their CIPs, but ALSDE does not appear to be holding LEAs or schools accountable for meeting the turnaround principles as expected under ESEA flexibility.</p>
<p>Next Steps</p>	<p>Through the process for renewing the SEA’s ESEA flexibility request, ALSDE must provide evidence demonstrating how it is ensuring that interventions aligned with all of the turnaround principles are being implemented in all priority schools in the first of three years of required implementation. Specifically, ALSDE must provide to ED a demonstration that all priority schools implemented interventions aligned with all of the turnaround principles beginning no later than SY 2014-2015. Additionally, for non-SIG priority schools that are considering either SY 2013-2014 or SY 2014-2015 as the first year of three years of required implementation, ALSDE must provide evidence of how it ensured that LEAs with non-SIG priority schools reviewed the performance of the current principal and have either replaced the principal if such a change is necessary to ensure strong and effective leadership, or is demonstrating to ALSDE that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort no later than the start of SY 2014-2015.</p> <p>If ALSDE is not able to provide such evidence, ALSDE may not consider SY 2014-2015 as the first year of three years of required implementation for those non-SIG priority schools for which it does not have such evidence. ALSDE must then, through the process for renewing the SEA’s ESEA flexibility request, submit: (1) a high-quality plan for ensuring that all priority schools are implementing interventions aligned with all turnaround principles in the first year of implementation; and (2) an amendment to its approved ESEA flexibility request including an updated timeline for implementation of interventions aligned with all of the turnaround principles that ensures that the first year of implementation for all priority schools occurs no later than SY 2015-2016. Additionally, ALSDE must submit evidence prior to the beginning of SY 2015-2016 that it expects and will hold LEAs accountable for implementing interventions in accordance with the definitions and expectations of ESEA flexibility.</p>

Element	Other Title I Schools (2.F)
<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>. Under ESEA Flexibility, an SEA must ensure that its system of differentiated recognition, accountability, and support “provides 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</p>

Element	Other Title I Schools (2.F)
	<p>gaps.” ALSDE’s approved ESEA flexibility request indicates that while all Alabama schools are required to write an annual CIP, schools that miss graduation, participation, and attendance rate targets for subgroups must include specific goals with strategies and interventions in their CIPs. Additionally, “schools that miss graduation rate targets for the All Student group and applicable ESEA subgroups must include explicit actions on the CIP to positively impact the graduation rate.”</p> <p>While ALSDE and its RPTs provide LEAs support in developing CIPs, the sample plans provided do not show evidence that LEAs and schools are required to include goals and interventions that specifically address missing graduation, attendance, and participation rate targets as ALSDE’s plan indicates, or include supports and incentives to address missed AMOs as required under ESEA flexibility.</p>
Next Steps	In order to be considered for ESEA flexibility renewal, ALSDE must ensure that its plan includes a clear and rigorous process for ensuring that LEAs provide interventions and supports for low-achieving students in other Title I schools in which one or more subgroups miss either AMOs or graduation rate targets or both over a number of years.

Element	State and Local Report Cards (§1111 of the ESEA; 2.B and Assurance 14)
Summary and Status of Implementation	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> or §1111 of the Elementary and Secondary Education Act (ESEA). ALSDE provided screenshots and a link to its Accountability Reporting System, which provides some State-, district-, and school-level data accountability data from SY 2012–2013. However, ALSDE did not provide evidence that for SY 2012–2013 it publicly reported performance against its new AMOs or reported all required information consistent with §1111 of the ESEA and ED’s February 8, 2013 report card guidance. ALSDE had just received assessment data from SY 2013–2014 at the time of the monitoring visit as a result of administering new assessments for the first time in SY 2013-2014.
Next Steps	As part of its request for renewal of ESEA flexibility, ALSDE must submit evidence that its State and local report cards for SY 2013-2014 include all information required under ESEA §1111 and are consistent with ED’s February 8, 2013 report card guidance or provide a plan and a timeline for releasing State and local report cards for SY 2013-2014.

Element	Teacher and Principal Evaluation and Support Systems (3.B)
Summary and Status of Implementation	On October 14 and 15, 2014, two expert peers reviewed ALSDE’s Principle 3 guidelines for teacher evaluation and support systems, as well as corresponding changes to the Principle 3 of ALSDE’s request. In a December 22, 2014 letter from ED to ALSDE, Assistant Secretary Deb Delisle indicated that ALSDE had not yet adopted guidelines for teacher and principal evaluation and support systems that meet all requirements of ESEA flexibility, nor does it have a

Element	Teacher and Principal Evaluation and Support Systems (3.B)
	process for ensuring that each district in Alabama develops, adopts, pilots, and implements teacher and principal evaluation and support systems consistent with those guidelines as required under ESEA flexibility. This letter also provided ALSDE feedback from that peer review identifying strengths, revisions that may be needed to meet Principle 3, and technical assistance suggestions.
Next Steps	As indicated in ED’s December 22, 2014 letter, through the process for renewing the SEA’s ESEA flexibility request, ALSDE must submit to ED an amended request incorporating final guidelines for teacher and principal evaluation and support systems consistent with all requirements for these systems under Principle 3 of ESEA flexibility and consistent with the renewal requirements pertaining to Principle 3 described in the document titled <i>ESEA Flexibility Guidance for Renewal Process</i> (Nov. 13, 2014).

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.

- ALSDE should strengthen its outreach activities beyond LEAs and schools, to parents and the broader community. In particular, ALSDE may want to enhance its outreach to families of students with disabilities and English Learners, especially in areas with higher concentrations of English Learners, to ensure these families understand the impact of the implementation of the principles of ESEA flexibility on their children.
- ALSDE should provide additional supports to all teachers and principals in helping English Learners and students with disabilities access college- and career-ready standards to ensure all students are prepared to be college- and career-ready.