

## ESEA FLEXIBILITY PART B MONITORING REPORT

MONITORING VISIT INFORMATION	
<b>State Educational Agency (SEA)</b>	Pennsylvania Department of Education (PDE)
<b>Request Approved</b>	August 20, 2013
<b>Request Amended</b>	N/A
<b>ESEA Flex Monitoring Activity</b>	Desk Monitoring
<b>Monitoring Review Date(s)</b>	December 16 and 18, 2014
<b>Exit Conference</b>	February 10, 2015
<b>Interviews Conducted</b>	Virginia Baker, Erin Derr, Jennifer Dugan, Pat Hozella, Linda Long, Don McCrone, Susan McCrone, John Nau, Jill Neuhard, Steve Novakovich, Rita Perez, Patrick Scanlon, Bob Shinskie, Lenny Sweeney, Dave Volkman, Angela Kirby Wehr, John Weiss, Glen Zehner
<b>U.S. Department of Education (ED) Monitors</b>	Victoria Hammer and Kim Light, Office of Elementary and Secondary Education, Office of State Support Leslie Clithero and Curtis Kinnard, Office of Special Education Programs

### 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 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.
- *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:

- PDE posts and regularly updates a wide variety of resources to support local implementation of teacher and principal evaluation and support systems.
- PDE’s Academic Recovery Liaisons (ARLs) provide ongoing technical assistance and progress monitoring for Priority schools. The ARLs began meeting regularly with their assigned Priority schools in March 2014 after School Improvement Plans were approved.
- PDE has recently convened an agency-wide working group to improve the SEA’s monitoring strategy by integrating compliance and process monitoring, shifting the focus from process to outcomes, and incorporating a risk management approach.
- PDE has developed a competitive grant program to provide funds to Reward and Focus schools that have entered into collaborative partnerships to work on Annual Measureable Objectives (AMOs).

### STATUS OF IMPLEMENTATION OF ESEA FLEXIBILITY

#### SEA Systems & Processes

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

#### Principle 1

Element	Status
<b>Transition to and Implement College- and Career-ready Standards</b> (1.B)	Meeting Expectations
<b>Adopt English Language Proficiency Standards</b> (Assurance 2)	Meeting Expectations

<b>Develop and Administer High-Quality Assessments</b> (Assurance 3)	Meeting Expectations
<b>Develop and Administer Alternate Assessments</b> (Assurance 3)	Meeting Expectations
<b>Develop and Administer English Language Proficiency Assessments</b> (Assurance 4)	Meeting Expectations
<b>Annually Reports College-going and College-credit Accumulation Rates</b> (Assurance 5)	Meeting Expectations

### Principle 2

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

### Principle 3

Element	Status
<b>Teacher Evaluation and Support Systems</b> (3.B)	Not Meeting Expectations
<b>Principal Evaluation and Support Systems</b> (3.B)	Not Meeting Expectations

### ELEMENTS REQUIRING NEXT STEPS

Element	Monitoring (EDGAR 80.40 and 2.G)
<b>Summary and Status of Implementation</b>	<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>.</p> <p>Under <i>ESEA Flexibility</i>, PDE is required to have a process to monitor implementation of ESEA flexibility activities at the local educational agency (LEA) and school levels regarding implementation of Principle 2 (differentiated recognition, accountability, and support systems) and Principle 3 (development, adoption, piloting, and implementation of teacher and principal evaluation and support systems). Currently, PDE is not meeting the expectations for ESEA flexibility monitoring because it does not monitor implementation of Principles</p>

Element	<b>Monitoring</b> (EDGAR 80.40 and 2.G)
	<p>2 and 3.</p> <p>With respect to Principle 2, based on the documentation PDE provided in response to this element, it is not clear how PDE’s monitoring of Focus Schools considers implementation of interventions targeted to the reasons for the Focus Schools being identified as such.</p> <p>With respect to Principle 3, PDE initially indicated that it does not have authority to monitor implementation of the teacher and principal evaluation and support systems that its legislation requires, except in its Race to the Top (RTT) and Schools Improvement Grant (SIG) schools. Subsequent to the monitoring call, PDE reported that it has determined that it will monitor implementation of these systems as part of its normal monitoring process. However, PDE did not provide additional detail.</p>
<b>Next Steps</b>	<p>Through the ESEA flexibility renewal process PDE must submit a plan for:</p> <ol style="list-style-type: none"> <li>1) PDE’s process to monitor implementation of interventions that address the needs of students in Focus Schools that led the schools to being identified as such.</li> <li>2) PDE’s process to monitor statewide LEA-level implementation of teacher and principal evaluation and support systems consistent with the requirements for such systems under ESEA flexibility.</li> </ol>

Element	<b>Reward Schools</b> (2.C)
<b>Summary and Status of Implementation</b>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request.</p> <p>Under its approved request for ESEA Flexibility, PDE indicated that it would provide a “Keystone Award” to each of its Reward Schools at one of the annual statewide education conferences. Rather than implement this approach, PDE’s Education Secretary and the Governor of Pennsylvania traveled to each Reward School and provided it with an “Academic Excellence Award.”</p>
<b>Next Steps</b>	<p>Through the ESEA flexibility renewal process, PDE must amend its request in this element to correctly reflect how it is providing rewards to its Reward Schools.</p>

Element	<b>Priority Schools</b> (2.D)
<b>Summary and Status of Implementation</b>	<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>.</p> <p>Under ESEA flexibility, PDE was required to identify a number of Priority Schools equal to five percent of participating Title I schools in the 2011–2012 school year or 93 schools. Initially, the State identified 91 Priority Schools; nine of which subsequently closed. PDE indicated that none of these schools closed</p>

	consistent with the SIG closure model, as required in order for a State to include such schools toward the required number of Priority Schools.
<b>Next Steps</b>	Through the ESEA flexibility renewal process, PDE must identify the requisite number of Priority Schools consistent with the document titled, “ <i>ESEA Flexibility Renewal Process: Frequently Asked Questions.</i> ” PDE can provide its list of Priority Schools on either March 31, 2015 with its renewal request or on January 31, 2016 if PDE chooses to use 2014–2015 assessment data in the identification of these schools.

<b>Element</b>	<b>Focus Schools (2.E)</b>
<b>Summary and Status of Implementation</b>	<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>.</p> <ol style="list-style-type: none"> <li>1) Under ESEA flexibility, PDE was required to identify a number of Focus Schools equal to ten percent of participating Title I schools in the 2011–2012 school year or 186 schools. Initially, the State identified 181 schools.</li> <li>2) Under ESEA flexibility, PDE must ensure that each Focus School identifies or develops and implements interventions that target the needs of students that led to the reason for the school being identified as a Focus School. Under PDE’s approved ESEA flexibility request, each Focus School must develop and implement a plan that provides an assurance that the school will implement one of the seven Turnaround Principles. The plans must be reviewed and approved by the Intermediate Unit (IU) that serves the Focus School. In the sample of approved plans the PDE provided, it is not clear which Turnaround Principle was selected nor is any description provided of how the Focus School will implement interventions targeted to the needs of students that led to the Focus School being identified as such.</li> <li>3) (See next step under <i>Monitoring</i>) Based on the documentation that PDE provided, it does not have a clear method for monitoring Focus School implementation of interventions targeted to the needs of students that led the school to being identified as such.</li> </ol>
<b>Next Steps</b>	<ol style="list-style-type: none"> <li>1) Through the ESEA flexibility renewal process, PDE must identify the requisite number of Focus Schools consistent with the document titled, “<i>ESEA Flexibility Renewal Process: Frequently Asked Questions.</i>” PDE can provide its list of Focus Schools on either March 31, 2015 with its renewal request or on January 31, 2016 if PDE chooses to use 2014–2015 assessment data in the identification of these schools.</li> <li>2) Through the ESEA flexibility renewal process, PDE must submit a high-quality plan describing how it will ensure that its requirements for Focus Schools result in the schools identifying or developing and implementing interventions that target the needs of the students that led to the Focus Schools being identified as such. This plan must include how PDE staff</li> </ol>

	will monitor this work in Focus Schools.
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<b>Element</b>	<b>Other Title I Schools (2.F)</b>
<b>Summary and Status of Implementation</b>	<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>.</p> <p>Under its approved request, PDE indicated that it would identify schools not identified as Focus or Priority but in which students miss AMOs for two consecutive years as Other Title I schools and that these schools must develop and implement plans to address the needs of these students. PDE did not specify whether this identification would be based on the “all students” group or applicable ESEA subgroups and what years of data would be used. Based on what PDE reported during the monitoring call, PDE had not yet decided if the identification would be based on the performance of the “all students” subgroup or relevant ESEA subgroups; however, PDE indicated that it had decided to use 2013–2014 and 2014–2015 assessment data. To date, PDE does not have a well-developed plan for meeting the needs of its Other Title I schools or the LEAs in which they reside.</p>
<b>Next Steps</b>	Through the ESEA flexibility renewal process, PDE must submit a high-quality plan for providing incentives and supports to other Title I schools that includes a clear and rigorous process for ensuring that LEAs provide interventions and supports for low-achieving students in those schools when one or more subgroups miss either AMOs or graduation rate targets or both over a number of years.

<b>Element</b>	<b>Teacher and Principal Evaluation and Support Systems (3.B)</b>
<b>Summary and Status of Implementation</b>	<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>.</p> <p>Under its approved ESEA flexibility request, PDE does not describe how it will monitor implementation of the teacher and principal evaluation and support systems in LEAs across the State. During the monitoring call, PDE indicated that it recently determined that it would monitor LEA implementation of its teacher and principal evaluation and support systems. PDE did not provide a description of the process that it would implement for monitoring implementation of these systems.</p>
<b>Next Steps</b>	Through the ESEA flexibility renewal process, PDE must submit a high-quality plan for monitoring LEA implementation of teacher and principal evaluation and support systems.

**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.

- *Increase collaboration between divisions at PDE.* While ED is encouraged by initial collaborative efforts, PDE may benefit from increasing collaboration between its divisions to support the needs of all students, including students with disabilities and English Learners. PDE may consider encouraging professional development opportunities between divisions to ensure collaboration between principals, teachers and support personnel to increase student outcomes. For example, during the monitoring call, PDE staff described a number of effective strategies used to engage parents of students with disabilities that could be applied more broadly to engage parents of other students.
- *Develop a more strategic approach to technical assistance.* PDE has a wide array of technical assistance resources and delivery systems that are available to LEAs and schools that are designed for different educator audiences and focus on a range of content areas related to accountability and instruction. Technical assistance could include more strategic targeting of these resources based on specific needs and gaps identified, particularly in Focus schools and other Title I schools, and clearer linkages to the specific Turnaround Principles.
- *Strengthen use of discipline data.* During the monitoring call, PDE staff indicated that discipline data is not a part of the School Performance Profile and it was unclear how this data is being used by LEAs and schools in the development and implementation of their School Improvement Plans. Technical assistance that highlights the relationship of this data (and other school climate and safety data) to academic achievement could further support LEAs and schools in the development and implementation of their plans.
- *Strengthen monitoring of college- and career-ready standards.* During the monitoring call, PDE indicated that in order to monitor its LEAs' implementation of the PA Core Standards, it monitors outcomes related to implementation of the standards. PDE further indicated that, to gauge LEA implementation of the PA Core Standards, it identifies LEAs with low student performance on its Statewide assessments and works with them to ensure alignment of curriculum and instruction with the PA Core Standards. PDE may consider building into its monitoring routines questions to determine where LEAs could be supported in continuously refining implementation of college- and career-ready standards to help inform the technical assistance that the IUs provide to LEAs in this reform area.

#### **ADDITIONAL COMMENTS**

- PDE has delegated authority to approve Priority and Focus schools' School Improvement Plans to PA's IUs. Given this, PDE should consider including relevant information in its renewal request about the relationship between the IUs and PDE, its LEAs, and its schools. This information should clarify the IUs' role and accountability in the School Improvement Plan planning and approval process.