



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Michael E. Hanson  
Superintendent  
Fresno Unified School District  
2309 Tulare Street  
Fresno, CA 93721

Dear Superintendent Hanson:

On February 10-13, 2014, a team from the U.S. Department of Education's (ED's) Office of Elementary and Secondary Education monitored the California Office to Reform Education (CORE) districts' implementation of its approved waivers under Section 9401 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Although there are eight districts participating in the joint waiver request, this visit was limited to a sample of four districts including: Fresno Unified School District, Los Angeles Unified School District, Oakland Unified School District, and Sacramento City Unified School District. The ED team also met with staff members from CORE. This monitoring aimed to continue the collaborative relationship that began during the waiver request approval process, provide ED with a deeper understanding of each district's goals and approaches to implementing ESEA flexibility, as well as CORE-wide goals and approaches, and ensure that the participating districts and CORE have the critical elements in place to continue implementation of their plan.

The review focused on the following elements:

- CORE-wide Systems and Processes, including Monitoring, Technical Assistance, Data Collection and Use, and Family and Community Engagement and Outreach,
- Transitioning to and Implementing College-and Career-Ready Standards,
- Developing and Administering High-Quality Assessments,
- Developing and Implementing a System of Differentiated Recognition, Accountability, and Support,
- Reward, Priority, Focus, and Other Title I Schools,
- Local Report Cards, and
- Teacher and Principal Evaluation and Support Systems.

ED staff facilitated a conference call with representatives of each of the participating districts on March 14, 2014 to share preliminary information from the on-site monitoring. Concerns included the following:

- CORE and the participating districts modified portions of the CORE waiver request and implemented those changes without ED's formal approval.
- Districts delayed and changed their strategies for implementing interventions in focus and priority schools.

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- Continued work is needed to develop CORE-wide guidelines for teacher and principal evaluation and support systems and to fully develop the School Quality Improvement Index.
- The districts appear to lack enforcement authority to ensure mutual accountability for implementing the plans outlined in the waiver request.

Through monitoring, ED learned that, in certain areas, the participating districts' implementation either did not meet ED's requirements or was inconsistent with the CORE request. These areas require the CORE participating districts to take certain next steps, as indicated below. Each of the participating districts must work collaboratively, through CORE, to respond to each of the next steps through the waiver extension process. ED expects that the participating districts will respond, through CORE, by including redlined changes to amend the CORE waiver request, or, where amendments to the request may not be warranted, providing a separate letter explaining how the participating districts have addressed or plan to address the issue.

### **CORE-Wide Systems and Processes**

ED's review of CORE-wide Systems and Processes included a review of four areas: (1) Monitoring, (2) Technical Assistance, (3) Data Collection and Use, and (4) Family and Community Engagement and Outreach. Next steps are required in two of these areas, as detailed below.

#### **Data Collection and Use**

As outlined in the CORE request, all participating districts are required to share their data with a third party vendor, the John W. Gardner Center for Youth and Their Communities at Stanford University (Gardner Center), for data aggregation and the production of reports available to CORE and the participating districts. The CORE request outlines a number of ways in which this information will be used. For instance, all focus schools are expected to use data from the Gardner Center to inform their selected interventions. During monitoring, the ED team learned that not all participating districts are currently sharing information with the Gardner Center.

As a next step, each of the participating districts must work collaboratively, through CORE, to articulate how and when all participating districts will work with the Gardner Center to make district-level data available for aggregation and reporting. The districts must also describe when and how each of the participating districts will use such data.

#### **Family and Community Engagement and Outreach**

The CORE request makes strong commitments to ensuring family and community engagement and outreach throughout the participating districts. Each of the participating districts is required to meaningfully engage and solicit input from teachers and principals and their representatives, as well as 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. During monitoring, the ED team learned of



concerns about district transparency about this engagement and the quality of such engagement and outreach in some participating districts.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide a description of current strategies to engage teachers and principals and their representatives, families, and communities, as well as how each participating district will ensure that family and community engagement is evaluated and monitored on a regular basis. This may include ensuring that the district stakeholder engagement plans submitted to CORE by April 15 of each year receive a rigorous review including progress against milestones in each district's plans and ensuring that each district engages in outreach to diverse stakeholder groups, including parents, teachers and their representatives, and other diverse organizations.

#### Additional Recommendation

In addition to the two next steps outlined above, ED recommends that CORE and the participating districts strengthen their monitoring efforts in order to ensure that each of the participating districts implements the CORE request with full fidelity. The participating districts may consider strengthening the district-to-district peer review process by which districts monitor each other for implementation of the plans outlined in the waiver request. This may include requiring districts to submit a District Implementation Plan on an annual basis, as this would increase the transparency of district plans and provide clear direction for conducting district-to-district monitoring.

### **Principle 1: College- and Career-ready Expectations for All Students**

ED's review of Principle 1 included a review of two areas: (1) Transition to and Implement College- and Career-ready Standards, and (2) Develop and Administer High-Quality Assessments Aligned with College- and Career-ready Standards. Next steps are required in both areas.

#### Transition to and Implement College- and Career-ready Standards

As described in the CORE request, each participating district has a district-level implementation plan for implementing college- and career-ready standards. During monitoring, ED staff learned that the implementation plans outlined in the CORE request do not always match each district's current plans for implementing college- and career-ready standards.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the district-level implementation plans for implementing college- and career-ready standards outlined in the CORE request for all participating districts are accurately described throughout the CORE request reflecting the activities occurring at the district-level.

#### Develop and Administer High-Quality Assessments

Through the CORE request, each participating district agreed to participate in the Smarter Balanced Assessment Consortia. In accordance with the language in the request, however, each



of the CORE participating districts agreed to continue to administer the California Standards Tests (CSTs) in grades 2-11 for accountability purposes during the 2013-2014 school year. In the time since the CORE waivers were granted, California has discontinued its plans to administer the CSTs in the 2013-2014 school year.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose amendments to the CORE request to reflect the participating districts' plans to pilot the Smarter Balanced Field Test in 2013-2014 rather than administer the CSTs. The districts should propose amendments to all references to these test administrations throughout the request.

### **Principle 2: Differentiated Recognition, Accountability, and Support**

ED's review of Principle 2 included a review of six areas: (1) System of Differentiated Recognition, Accountability, and Support, (2) Reward Schools, (3) Priority Schools, (4) Focus Schools, (5) Other Title I Schools, and (6) Local Report Cards. Next steps are required in each of these areas, as detailed below.

#### **System of Differentiated Recognition, Accountability, and Support**

The CORE request describes the CORE School Quality Improvement System (SQIS). When the request was written, the SQIS was a work in progress. Because of the continued work needed to develop the SQIS, ED approved the CORE request with a condition. To continue to implement the waivers beyond the 2013-2014 school year, CORE's condition requires the districts to submit an amended joint request including the final version of the new SQIS by May 1, 2014. Through monitoring, ED staff learned that continued work is needed to address each of the three domains within the School Quality Improvement Index (SQII): the academic domain, the social-emotional domain, and the culture and climate domain.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide additional detail regarding the participating districts' plans in each of these domains. Such detail includes information about the specific measures that will be included in SQII scores and the weightings assigned to each of those measures. Since statewide assessment data will not be available for the 2013-2014 school year, CORE and the participating districts must propose to amend the CORE request to indicate how SQII scores will be calculated based on data from the 2013-2014, 2014-2015, and 2015-2016 school years, explaining how the three domains will be calculated and weighted to produce SQII scores based on data from each of those school years.

#### **Reward Schools**

The next steps required with regard to reward schools are described below.

##### *Next Step 1: Partnering Strategy*

A fundamental tenet of the CORE request's system of support for priority school interventions is the partnering of reward schools with priority school partners. During monitoring, ED staff learned that less than half of the identified priority schools are partnered with a reward school.



Rather, ED staff learned that CORE decided to partner some priority schools with a non-reward school partner (*i.e.*, a network of schools, or an “other high performing school”) in order to better meet the priority school’s needs.

As a next step, each of the participating districts must work collaboratively, through CORE, to submit an amendment request for ED’s approval that articulates the current strategy for partnering reward schools with priority and/or focus schools (*i.e.*, explaining why only select reward schools are partnered and how those partnerships are determined). The participating districts must also explain the rationale for changing the previously approved method of partnering each priority school with a reward school partner.

#### *Next Step 2: Reward School Categories*

The CORE request clearly identified the participating districts’ method for identifying reward schools. Under the request, there are two categories of reward schools: Highest-performing and High-progress Title I schools. During monitoring, ED staff learned that CORE and the participating districts added an additional category of reward schools, “other high performing schools” to the partnership model.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose to amend the request to clearly define all categories of reward schools, including “other high performing schools” and define how those schools are partnered with priority and/or focus schools.

#### *Next Step 3: Reward School Recognition*

Under the CORE request, all reward schools are to be recognized on an annual basis. ED staff learned through monitoring that some districts have not recognized all identified reward schools. In one district there was a deliberate decision to not recognize one reward school. In another district none of the reward schools have been identified.

As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

#### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

#### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

### *Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

### Focus Schools

The next steps required with regard to focus schools are described below.

### *Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that each district will ensure that all focus schools fully implement the intervention strategy outlined in the CORE request according to the timelines outlined in the request. As necessary, the districts should propose to amend the CORE request to accurately reflect the intervention strategy for focus schools in the CORE-participating districts (*i.e.*, clarify if districts will implement their own COPs rather than join CORE-facilitated COPs and explain how that work will be operationalized).

### *Next Step 2: Selection of Focus School Interventions*

In accordance with the CORE request, the participating districts with focus schools were to receive data reports from the Gardner Center that would be used to inform interventions based upon the particular needs at the school site. As explained under Data Collection and Use, above, through monitoring ED staff learned that not all participating districts are currently sharing information with the Gardner Center. Focus schools are also in the preliminary stages of selecting interventions, as some have yet to begin COP work. Based on the delay in this



implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the selected interventions at each focus school target the populations of students that led to the schools' identification as a focus school.

#### *Next Step 3: Focus School Partnering Strategy*

Although it is not anticipated in most places in the CORE request that there will be partnering between reward and focus schools, there are some references to this strategy throughout the request. During monitoring ED staff learned that the CORE districts are not currently partnering focus and reward schools in a systematic way as part of their focus school strategy.

As a next step, each of the participating districts must work collaboratively, through CORE, to clarify how reward schools will be partnered with focus schools in future years and propose to amend the CORE request as necessary.

#### *Next Step 4: School Site Council Engagement*

In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating focus school will work with its advisory group to review and revise improvement plans as outlined in the CORE request.

#### *Additional Recommendation*

The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

#### Other Title I Schools

As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating district meets the requirements for identifying and implementing interventions in other Title I schools that are not making progress against both AMOs and graduation rate targets, as outlined in the CORE request.

### Local Report Cards

Under Assurance 7 in the CORE request, each participating district assured that reporting will occur annually on local educational agency (LEA) report cards, for the LEA and for each of its schools on local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the approved waivers’ annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. The assurance also provides that the LEAs will annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively. Through monitoring, ED staff learned that the participating districts are not meeting these requirements. Some LEAs were not able to produce a local report card. One district produced a report card, but it did not contain the required information.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each CORE-participating district creates a local report card that complies with ED’s *State and Local Report Cards Under Title I, Part A* guidance, issued on February 8, 2013. Each of the CORE-participating districts must submit a template demonstrating how it will create a compliant report card based on 2013-2014 school year data.

### Principle 3: Supporting Effective Instruction and Leadership

ED’s review of Principle 3 included a review of three areas: (1) Guidelines for Local Teacher and Principal Evaluation and Support Systems, (2) Implementation of Teacher Evaluation and Support Systems, and (3) Implementation of Principal Evaluation and Support Systems. Rather than describe the requirements for next steps in these areas, ED asks that the districts continue to work collaboratively, through CORE, to address the concerns highlighted in ED’s February 25, 2014 letter regarding developing the CORE guidelines for teacher and principal evaluation and support systems and implementing those systems in each participating district.

As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education





## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable John Deasy  
Superintendent  
Los Angeles Unified School District  
333 South Beaudry Avenue  
Los Angeles, CA 90017

Dear Superintendent Deasy:

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As a next step, each of the participating districts must work collaboratively, through CORE, to articulate how and when all participating districts will work with the Gardner Center to make district-level data available for aggregation and reporting. The districts must also describe when and how each of the participating districts will use such data.

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concerns about district transparency about this engagement and the quality of such engagement and outreach in some participating districts.

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#### Additional Recommendation

In addition to the two next steps outlined above, ED recommends that CORE and the participating districts strengthen their monitoring efforts in order to ensure that each of the participating districts implements the CORE request with full fidelity. The participating districts may consider strengthening the district-to-district peer review process by which districts monitor each other for implementation of the plans outlined in the waiver request. This may include requiring districts to submit a District Implementation Plan on an annual basis, as this would increase the transparency of district plans and provide clear direction for conducting district-to-district monitoring.

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As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

##### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

##### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

### *Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

### Focus Schools

The next steps required with regard to focus schools are described below.

### *Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that each district will ensure that all focus schools fully implement the intervention strategy outlined in the CORE request according to the timelines outlined in the request. As necessary, the districts should propose to amend the CORE request to accurately reflect the intervention strategy for focus schools in the CORE-participating districts (*i.e.*, clarify if districts will implement their own COPs rather than join CORE-facilitated COPs and explain how that work will be operationalized).

### *Next Step 2: Selection of Focus School Interventions*

In accordance with the CORE request, the participating districts with focus schools were to receive data reports from the Gardner Center that would be used to inform interventions based upon the particular needs at the school site. As explained under Data Collection and Use, above, through monitoring ED staff learned that not all participating districts are currently sharing information with the Gardner Center. Focus schools are also in the preliminary stages of selecting interventions, as some have yet to begin COP work. Based on the delay in this



implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the selected interventions at each focus school target the populations of students that led to the schools' identification as a focus school.

#### *Next Step 3: Focus School Partnering Strategy*

Although it is not anticipated in most places in the CORE request that there will be partnering between reward and focus schools, there are some references to this strategy throughout the request. During monitoring ED staff learned that the CORE districts are not currently partnering focus and reward schools in a systematic way as part of their focus school strategy.

As a next step, each of the participating districts must work collaboratively, through CORE, to clarify how reward schools will be partnered with focus schools in future years and propose to amend the CORE request as necessary.

#### *Next Step 4: School Site Council Engagement*

In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating focus school will work with its advisory group to review and revise improvement plans as outlined in the CORE request.

#### *Additional Recommendation*

The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

#### Other Title I Schools

As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating district meets the requirements for identifying and implementing interventions in other Title I schools that are not making progress against both AMOs and graduation rate targets, as outlined in the CORE request.

#### Local Report Cards

Under Assurance 7 in the CORE request, each participating district assured that reporting will occur annually on local educational agency (LEA) report cards, for the LEA and for each of its schools on local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the approved waivers’ annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. The assurance also provides that the LEAs will annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively. Through monitoring, ED staff learned that the participating districts are not meeting these requirements. Some LEAs were not able to produce a local report card. One district produced a report card, but it did not contain the required information.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each CORE-participating district creates a local report card that complies with ED’s *State and Local Report Cards Under Title I, Part A* guidance, issued on February 8, 2013. Each of the CORE-participating districts must submit a template demonstrating how it will create a compliant report card based on 2013-2014 school year data.

#### Principle 3: Supporting Effective Instruction and Leadership

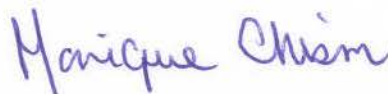
ED’s review of Principle 3 included a review of three areas: (1) Guidelines for Local Teacher and Principal Evaluation and Support Systems, (2) Implementation of Teacher Evaluation and Support Systems, and (3) Implementation of Principal Evaluation and Support Systems. Rather than describe the requirements for next steps in these areas, ED asks that the districts continue to work collaboratively, through CORE, to address the concerns highlighted in ED’s February 25, 2014 letter regarding developing the CORE guidelines for teacher and principal evaluation and support systems and implementing those systems in each participating district.

As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Christopher J. Steinhauser  
Superintendent  
Long Beach Unified School District  
1515 Hughes Way  
Long Beach, CA 90810

Dear Superintendent Steinhauser:

On February 10-13, 2014, a team from the U.S. Department of Education's (ED's) Office of Elementary and Secondary Education monitored the California Office to Reform Education (CORE) districts' implementation of its approved waivers under Section 9401 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Although there are eight districts participating in the joint waiver request, this visit was limited to a sample of four districts including: Fresno Unified School District, Los Angeles Unified School District, Oakland Unified School District, and Sacramento City Unified School District. The ED team also met with staff members from CORE. This monitoring aimed to continue the collaborative relationship that began during the waiver request approval process, provide ED with a deeper understanding of each district's goals and approaches to implementing ESEA flexibility, as well as CORE-wide goals and approaches, and ensure that the participating districts and CORE have the critical elements in place to continue implementation of their plan.

The review focused on the following elements:

- CORE-wide Systems and Processes, including Monitoring, Technical Assistance, Data Collection and Use, and Family and Community Engagement and Outreach,
- Transitioning to and Implementing College-and Career-Ready Standards,
- Developing and Administering High-Quality Assessments,
- Developing and Implementing a System of Differentiated Recognition, Accountability, and Support,
- Reward, Priority, Focus, and Other Title I Schools,
- Local Report Cards, and
- Teacher and Principal Evaluation and Support Systems.

ED staff facilitated a conference call with representatives of each of the participating districts on March 14, 2014 to share preliminary information from the on-site monitoring. Concerns included the following:

- CORE and the participating districts modified portions of the CORE waiver request and implemented those changes without ED's formal approval.
- Districts delayed and changed their strategies for implementing interventions in focus and priority schools.

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- Continued work is needed to develop CORE-wide guidelines for teacher and principal evaluation and support systems and to fully develop the School Quality Improvement Index.
- The districts appear to lack enforcement authority to ensure mutual accountability for implementing the plans outlined in the waiver request.

Through monitoring, ED learned that, in certain areas, the participating districts' implementation either did not meet ED's requirements or was inconsistent with the CORE request. These areas require the CORE participating districts to take certain next steps, as indicated below. Each of the participating districts must work collaboratively, through CORE, to respond to each of the next steps through the waiver extension process. ED expects that the participating districts will respond, through CORE, by including redlined changes to amend the CORE waiver request, or, where amendments to the request may not be warranted, providing a separate letter explaining how the participating districts have addressed or plan to address the issue.

### **CORE-Wide Systems and Processes**

ED's review of CORE-wide Systems and Processes included a review of four areas: (1) Monitoring, (2) Technical Assistance, (3) Data Collection and Use, and (4) Family and Community Engagement and Outreach. Next steps are required in two of these areas, as detailed below.

#### **Data Collection and Use**

As outlined in the CORE request, all participating districts are required to share their data with a third party vendor, the John W. Gardner Center for Youth and Their Communities at Stanford University (Gardner Center), for data aggregation and the production of reports available to CORE and the participating districts. The CORE request outlines a number of ways in which this information will be used. For instance, all focus schools are expected to use data from the Gardner Center to inform their selected interventions. During monitoring, the ED team learned that not all participating districts are currently sharing information with the Gardner Center.

As a next step, each of the participating districts must work collaboratively, through CORE, to articulate how and when all participating districts will work with the Gardner Center to make district-level data available for aggregation and reporting. The districts must also describe when and how each of the participating districts will use such data.

#### **Family and Community Engagement and Outreach**

The CORE request makes strong commitments to ensuring family and community engagement and outreach throughout the participating districts. Each of the participating districts is required to meaningfully engage and solicit input from teachers and principals and their representatives, as well as 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. During monitoring, the ED team learned of



concerns about district transparency about this engagement and the quality of such engagement and outreach in some participating districts.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide a description of current strategies to engage teachers and principals and their representatives, families, and communities, as well as how each participating district will ensure that family and community engagement is evaluated and monitored on a regular basis. This may include ensuring that the district stakeholder engagement plans submitted to CORE by April 15 of each year receive a rigorous review including progress against milestones in each district's plans and ensuring that each district engages in outreach to diverse stakeholder groups, including parents, teachers and their representatives, and other diverse organizations.

#### Additional Recommendation

In addition to the two next steps outlined above, ED recommends that CORE and the participating districts strengthen their monitoring efforts in order to ensure that each of the participating districts implements the CORE request with full fidelity. The participating districts may consider strengthening the district-to-district peer review process by which districts monitor each other for implementation of the plans outlined in the waiver request. This may include requiring districts to submit a District Implementation Plan on an annual basis, as this would increase the transparency of district plans and provide clear direction for conducting district-to-district monitoring.

#### **Principle 1: College- and Career-ready Expectations for All Students**

ED's review of Principle 1 included a review of two areas: (1) Transition to and Implement College- and Career-ready Standards, and (2) Develop and Administer High-Quality Assessments Aligned with College- and Career-ready Standards. Next steps are required in both areas.

##### Transition to and Implement College- and Career-ready Standards

As described in the CORE request, each participating district has a district-level implementation plan for implementing college- and career-ready standards. During monitoring, ED staff learned that the implementation plans outlined in the CORE request do not always match each district's current plans for implementing college- and career-ready standards.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the district-level implementation plans for implementing college- and career-ready standards outlined in the CORE request for all participating districts are accurately described throughout the CORE request reflecting the activities occurring at the district-level.

##### Develop and Administer High-Quality Assessments

Through the CORE request, each participating district agreed to participate in the Smarter Balanced Assessment Consortia. In accordance with the language in the request, however, each



of the CORE participating districts agreed to continue to administer the California Standards Tests (CSTs) in grades 2-11 for accountability purposes during the 2013-2014 school year. In the time since the CORE waivers were granted, California has discontinued its plans to administer the CSTs in the 2013-2014 school year.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose amendments to the CORE request to reflect the participating districts' plans to pilot the Smarter Balanced Field Test in 2013-2014 rather than administer the CSTs. The districts should propose amendments to all references to these test administrations throughout the request.

### **Principle 2: Differentiated Recognition, Accountability, and Support**

ED's review of Principle 2 included a review of six areas: (1) System of Differentiated Recognition, Accountability, and Support, (2) Reward Schools, (3) Priority Schools, (4) Focus Schools, (5) Other Title I Schools, and (6) Local Report Cards. Next steps are required in each of these areas, as detailed below.

#### **System of Differentiated Recognition, Accountability, and Support**

The CORE request describes the CORE School Quality Improvement System (SQIS). When the request was written, the SQIS was a work in progress. Because of the continued work needed to develop the SQIS, ED approved the CORE request with a condition. To continue to implement the waivers beyond the 2013-2014 school year, CORE's condition requires the districts to submit an amended joint request including the final version of the new SQIS by May 1, 2014. Through monitoring, ED staff learned that continued work is needed to address each of the three domains within the School Quality Improvement Index (SQII): the academic domain, the social-emotional domain, and the culture and climate domain.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide additional detail regarding the participating districts' plans in each of these domains. Such detail includes information about the specific measures that will be included in SQII scores and the weightings assigned to each of those measures. Since statewide assessment data will not be available for the 2013-2014 school year, CORE and the participating districts must propose to amend the CORE request to indicate how SQII scores will be calculated based on data from the 2013-2014, 2014-2015, and 2015-2016 school years, explaining how the three domains will be calculated and weighted to produce SQII scores based on data from each of those school years.

#### **Reward Schools**

The next steps required with regard to reward schools are described below.

##### *Next Step 1: Partnering Strategy*

A fundamental tenet of the CORE request's system of support for priority school interventions is the partnering of reward schools with priority school partners. During monitoring, ED staff learned that less than half of the identified priority schools are partnered with a reward school.



Rather, ED staff learned that CORE decided to partner some priority schools with a non-reward school partner (*i.e.*, a network of schools, or an “other high performing school”) in order to better meet the priority school’s needs.

As a next step, each of the participating districts must work collaboratively, through CORE, to submit an amendment request for ED’s approval that articulates the current strategy for partnering reward schools with priority and/or focus schools (*i.e.*, explaining why only select reward schools are partnered and how those partnerships are determined). The participating districts must also explain the rationale for changing the previously approved method of partnering each priority school with a reward school partner.

#### *Next Step 2: Reward School Categories*

The CORE request clearly identified the participating districts’ method for identifying reward schools. Under the request, there are two categories of reward schools: Highest-performing and High-progress Title I schools. During monitoring, ED staff learned that CORE and the participating districts added an additional category of reward schools, “other high performing schools” to the partnership model.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose to amend the request to clearly define all categories of reward schools, including “other high performing schools” and define how those schools are partnered with priority and/or focus schools.

#### *Next Step 3: Reward School Recognition*

Under the CORE request, all reward schools are to be recognized on an annual basis. ED staff learned through monitoring that some districts have not recognized all identified reward schools. In one district there was a deliberate decision to not recognize one reward school. In another district none of the reward schools have been identified.

As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

##### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

##### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

*Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

Focus Schools

The next steps required with regard to focus schools are described below.

*Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

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implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

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In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

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The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

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As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.



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#### Principle 3: Supporting Effective Instruction and Leadership

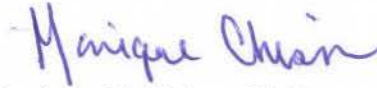
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As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Gary Yee  
Superintendent  
Oakland Unified School District  
1025 Second Avenue  
Oakland, CA 94606

Dear Superintendent Yee:

On February 10-13, 2014, a team from the U.S. Department of Education's (ED's) Office of Elementary and Secondary Education monitored the California Office to Reform Education (CORE) districts' implementation of its approved waivers under Section 9401 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Although there are eight districts participating in the joint waiver request, this visit was limited to a sample of four districts including: Fresno Unified School District, Los Angeles Unified School District, Oakland Unified School District, and Sacramento City Unified School District. The ED team also met with staff members from CORE. This monitoring aimed to continue the collaborative relationship that began during the waiver request approval process, provide ED with a deeper understanding of each district's goals and approaches to implementing ESEA flexibility, as well as CORE-wide goals and approaches, and ensure that the participating districts and CORE have the critical elements in place to continue implementation of their plan.

The review focused on the following elements:

- CORE-wide Systems and Processes, including Monitoring, Technical Assistance, Data Collection and Use, and Family and Community Engagement and Outreach,
- Transitioning to and Implementing College-and Career-Ready Standards,
- Developing and Administering High-Quality Assessments,
- Developing and Implementing a System of Differentiated Recognition, Accountability, and Support,
- Reward, Priority, Focus, and Other Title I Schools,
- Local Report Cards, and
- Teacher and Principal Evaluation and Support Systems.

ED staff facilitated a conference call with representatives of each of the participating districts on March 14, 2014 to share preliminary information from the on-site monitoring. Concerns included the following:

- CORE and the participating districts modified portions of the CORE waiver request and implemented those changes without ED's formal approval.
- Districts delayed and changed their strategies for implementing interventions in focus and priority schools.

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- Continued work is needed to develop CORE-wide guidelines for teacher and principal evaluation and support systems and to fully develop the School Quality Improvement Index.
- The districts appear to lack enforcement authority to ensure mutual accountability for implementing the plans outlined in the waiver request.

Through monitoring, ED learned that, in certain areas, the participating districts' implementation either did not meet ED's requirements or was inconsistent with the CORE request. These areas require the CORE participating districts to take certain next steps, as indicated below. Each of the participating districts must work collaboratively, through CORE, to respond to each of the next steps through the waiver extension process. ED expects that the participating districts will respond, through CORE, by including redlined changes to amend the CORE waiver request, or, where amendments to the request may not be warranted, providing a separate letter explaining how the participating districts have addressed or plan to address the issue.

### **CORE-Wide Systems and Processes**

ED's review of CORE-wide Systems and Processes included a review of four areas: (1) Monitoring, (2) Technical Assistance, (3) Data Collection and Use, and (4) Family and Community Engagement and Outreach. Next steps are required in two of these areas, as detailed below.

#### **Data Collection and Use**

As outlined in the CORE request, all participating districts are required to share their data with a third party vendor, the John W. Gardner Center for Youth and Their Communities at Stanford University (Gardner Center), for data aggregation and the production of reports available to CORE and the participating districts. The CORE request outlines a number of ways in which this information will be used. For instance, all focus schools are expected to use data from the Gardner Center to inform their selected interventions. During monitoring, the ED team learned that not all participating districts are currently sharing information with the Gardner Center.

As a next step, each of the participating districts must work collaboratively, through CORE, to articulate how and when all participating districts will work with the Gardner Center to make district-level data available for aggregation and reporting. The districts must also describe when and how each of the participating districts will use such data.

#### **Family and Community Engagement and Outreach**

The CORE request makes strong commitments to ensuring family and community engagement and outreach throughout the participating districts. Each of the participating districts is required to meaningfully engage and solicit input from teachers and principals and their representatives, as well as 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. During monitoring, the ED team learned of



concerns about district transparency about this engagement and the quality of such engagement and outreach in some participating districts.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide a description of current strategies to engage teachers and principals and their representatives, families, and communities, as well as how each participating district will ensure that family and community engagement is evaluated and monitored on a regular basis. This may include ensuring that the district stakeholder engagement plans submitted to CORE by April 15 of each year receive a rigorous review including progress against milestones in each district's plans and ensuring that each district engages in outreach to diverse stakeholder groups, including parents, teachers and their representatives, and other diverse organizations.

#### Additional Recommendation

In addition to the two next steps outlined above, ED recommends that CORE and the participating districts strengthen their monitoring efforts in order to ensure that each of the participating districts implements the CORE request with full fidelity. The participating districts may consider strengthening the district-to-district peer review process by which districts monitor each other for implementation of the plans outlined in the waiver request. This may include requiring districts to submit a District Implementation Plan on an annual basis, as this would increase the transparency of district plans and provide clear direction for conducting district-to-district monitoring.

#### Principle 1: College- and Career-ready Expectations for All Students

ED's review of Principle 1 included a review of two areas: (1) Transition to and Implement College- and Career-ready Standards, and (2) Develop and Administer High-Quality Assessments Aligned with College- and Career-ready Standards. Next steps are required in both areas.

##### Transition to and Implement College- and Career-ready Standards

As described in the CORE request, each participating district has a district-level implementation plan for implementing college- and career-ready standards. During monitoring, ED staff learned that the implementation plans outlined in the CORE request do not always match each district's current plans for implementing college- and career-ready standards.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the district-level implementation plans for implementing college- and career-ready standards outlined in the CORE request for all participating districts are accurately described throughout the CORE request reflecting the activities occurring at the district-level.

##### Develop and Administer High-Quality Assessments

Through the CORE request, each participating district agreed to participate in the Smarter Balanced Assessment Consortia. In accordance with the language in the request, however, each



of the CORE participating districts agreed to continue to administer the California Standards Tests (CSTs) in grades 2-11 for accountability purposes during the 2013-2014 school year. In the time since the CORE waivers were granted, California has discontinued its plans to administer the CSTs in the 2013-2014 school year.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose amendments to the CORE request to reflect the participating districts' plans to pilot the Smarter Balanced Field Test in 2013-2014 rather than administer the CSTs. The districts should propose amendments to all references to these test administrations throughout the request.

### **Principle 2: Differentiated Recognition, Accountability, and Support**

ED's review of Principle 2 included a review of six areas: (1) System of Differentiated Recognition, Accountability, and Support, (2) Reward Schools, (3) Priority Schools, (4) Focus Schools, (5) Other Title I Schools, and (6) Local Report Cards. Next steps are required in each of these areas, as detailed below.

#### **System of Differentiated Recognition, Accountability, and Support**

The CORE request describes the CORE School Quality Improvement System (SQIS). When the request was written, the SQIS was a work in progress. Because of the continued work needed to develop the SQIS, ED approved the CORE request with a condition. To continue to implement the waivers beyond the 2013-2014 school year, CORE's condition requires the districts to submit an amended joint request including the final version of the new SQIS by May 1, 2014. Through monitoring, ED staff learned that continued work is needed to address each of the three domains within the School Quality Improvement Index (SQII): the academic domain, the social-emotional domain, and the culture and climate domain.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide additional detail regarding the participating districts' plans in each of these domains. Such detail includes information about the specific measures that will be included in SQII scores and the weightings assigned to each of those measures. Since statewide assessment data will not be available for the 2013-2014 school year, CORE and the participating districts must propose to amend the CORE request to indicate how SQII scores will be calculated based on data from the 2013-2014, 2014-2015, and 2015-2016 school years, explaining how the three domains will be calculated and weighted to produce SQII scores based on data from each of those school years.

#### **Reward Schools**

The next steps required with regard to reward schools are described below.

##### *Next Step 1: Partnering Strategy*

A fundamental tenet of the CORE request's system of support for priority school interventions is the partnering of reward schools with priority school partners. During monitoring, ED staff learned that less than half of the identified priority schools are partnered with a reward school.



Rather, ED staff learned that CORE decided to partner some priority schools with a non-reward school partner (*i.e.*, a network of schools, or an “other high performing school”) in order to better meet the priority school’s needs.

As a next step, each of the participating districts must work collaboratively, through CORE, to submit an amendment request for ED’s approval that articulates the current strategy for partnering reward schools with priority and/or focus schools (*i.e.*, explaining why only select reward schools are partnered and how those partnerships are determined). The participating districts must also explain the rationale for changing the previously approved method of partnering each priority school with a reward school partner.

#### *Next Step 2: Reward School Categories*

The CORE request clearly identified the participating districts’ method for identifying reward schools. Under the request, there are two categories of reward schools: Highest-performing and High-progress Title I schools. During monitoring, ED staff learned that CORE and the participating districts added an additional category of reward schools, “other high performing schools” to the partnership model.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose to amend the request to clearly define all categories of reward schools, including “other high performing schools” and define how those schools are partnered with priority and/or focus schools.

#### *Next Step 3: Reward School Recognition*

Under the CORE request, all reward schools are to be recognized on an annual basis. ED staff learned through monitoring that some districts have not recognized all identified reward schools. In one district there was a deliberate decision to not recognize one reward school. In another district none of the reward schools have been identified.

As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

##### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

##### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

*Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

Focus Schools

The next steps required with regard to focus schools are described below.

*Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that each district will ensure that all focus schools fully implement the intervention strategy outlined in the CORE request according to the timelines outlined in the request. As necessary, the districts should propose to amend the CORE request to accurately reflect the intervention strategy for focus schools in the CORE-participating districts (*i.e.*, clarify if districts will implement their own COPs rather than join CORE-facilitated COPs and explain how that work will be operationalized).

*Next Step 2: Selection of Focus School Interventions*

In accordance with the CORE request, the participating districts with focus schools were to receive data reports from the Gardner Center that would be used to inform interventions based upon the particular needs at the school site. As explained under Data Collection and Use, above, through monitoring ED staff learned that not all participating districts are currently sharing information with the Gardner Center. Focus schools are also in the preliminary stages of selecting interventions, as some have yet to begin COP work. Based on the delay in this



implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the selected interventions at each focus school target the populations of students that led to the schools' identification as a focus school.

#### *Next Step 3: Focus School Partnering Strategy*

Although it is not anticipated in most places in the CORE request that there will be partnering between reward and focus schools, there are some references to this strategy throughout the request. During monitoring ED staff learned that the CORE districts are not currently partnering focus and reward schools in a systematic way as part of their focus school strategy.

As a next step, each of the participating districts must work collaboratively, through CORE, to clarify how reward schools will be partnered with focus schools in future years and propose to amend the CORE request as necessary.

#### *Next Step 4: School Site Council Engagement*

In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating focus school will work with its advisory group to review and revise improvement plans as outlined in the CORE request.

#### *Additional Recommendation*

The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

#### Other Title I Schools

As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating district meets the requirements for identifying and implementing interventions in other Title I schools that are not making progress against both AMOs and graduation rate targets, as outlined in the CORE request.

#### Local Report Cards

Under Assurance 7 in the CORE request, each participating district assured that reporting will occur annually on local educational agency (LEA) report cards, for the LEA and for each of its schools on local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the approved waivers’ annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. The assurance also provides that the LEAs will annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively. Through monitoring, ED staff learned that the participating districts are not meeting these requirements. Some LEAs were not able to produce a local report card. One district produced a report card, but it did not contain the required information.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each CORE-participating district creates a local report card that complies with ED’s *State and Local Report Cards Under Title I, Part A* guidance, issued on February 8, 2013. Each of the CORE-participating districts must submit a template demonstrating how it will create a compliant report card based on 2013-2014 school year data.

#### Principle 3: Supporting Effective Instruction and Leadership

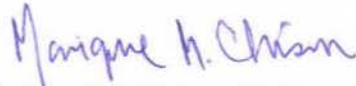
ED’s review of Principle 3 included a review of three areas: (1) Guidelines for Local Teacher and Principal Evaluation and Support Systems, (2) Implementation of Teacher Evaluation and Support Systems, and (3) Implementation of Principal Evaluation and Support Systems. Rather than describe the requirements for next steps in these areas, ED asks that the districts continue to work collaboratively, through CORE, to address the concerns highlighted in ED’s February 25, 2014 letter regarding developing the CORE guidelines for teacher and principal evaluation and support systems and implementing those systems in each participating district.

As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Rick Miller  
Superintendent  
Santa Ana Unified School District  
1601 East Chestnut Avenue  
Santa Ana, CA 92701

Dear Superintendent Miller:

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#### Additional Recommendation

In addition to the two next steps outlined above, ED recommends that CORE and the participating districts strengthen their monitoring efforts in order to ensure that each of the participating districts implements the CORE request with full fidelity. The participating districts may consider strengthening the district-to-district peer review process by which districts monitor each other for implementation of the plans outlined in the waiver request. This may include requiring districts to submit a District Implementation Plan on an annual basis, as this would increase the transparency of district plans and provide clear direction for conducting district-to-district monitoring.

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Rather, ED staff learned that CORE decided to partner some priority schools with a non-reward school partner (*i.e.*, a network of schools, or an “other high performing school”) in order to better meet the priority school’s needs.

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Under the CORE request, all reward schools are to be recognized on an annual basis. ED staff learned through monitoring that some districts have not recognized all identified reward schools. In one district there was a deliberate decision to not recognize one reward school. In another district none of the reward schools have been identified.

As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

##### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

##### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

### *Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

### Focus Schools

The next steps required with regard to focus schools are described below.

### *Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that each district will ensure that all focus schools fully implement the intervention strategy outlined in the CORE request according to the timelines outlined in the request. As necessary, the districts should propose to amend the CORE request to accurately reflect the intervention strategy for focus schools in the CORE-participating districts (*i.e.*, clarify if districts will implement their own COPs rather than join CORE-facilitated COPs and explain how that work will be operationalized).

### *Next Step 2: Selection of Focus School Interventions*

In accordance with the CORE request, the participating districts with focus schools were to receive data reports from the Gardner Center that would be used to inform interventions based upon the particular needs at the school site. As explained under Data Collection and Use, above, through monitoring ED staff learned that not all participating districts are currently sharing information with the Gardner Center. Focus schools are also in the preliminary stages of selecting interventions, as some have yet to begin COP work. Based on the delay in this



implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the selected interventions at each focus school target the populations of students that led to the schools' identification as a focus school.

#### *Next Step 3: Focus School Partnering Strategy*

Although it is not anticipated in most places in the CORE request that there will be partnering between reward and focus schools, there are some references to this strategy throughout the request. During monitoring ED staff learned that the CORE districts are not currently partnering focus and reward schools in a systematic way as part of their focus school strategy.

As a next step, each of the participating districts must work collaboratively, through CORE, to clarify how reward schools will be partnered with focus schools in future years and propose to amend the CORE request as necessary.

#### *Next Step 4: School Site Council Engagement*

In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating focus school will work with its advisory group to review and revise improvement plans as outlined in the CORE request.

#### *Additional Recommendation*

The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

#### Other Title I Schools

As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating district meets the requirements for identifying and implementing interventions in other Title I schools that are not making progress against both AMOs and graduation rate targets, as outlined in the CORE request.

#### Local Report Cards

Under Assurance 7 in the CORE request, each participating district assured that reporting will occur annually on local educational agency (LEA) report cards, for the LEA and for each of its schools on local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the approved waivers’ annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. The assurance also provides that the LEAs will annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively. Through monitoring, ED staff learned that the participating districts are not meeting these requirements. Some LEAs were not able to produce a local report card. One district produced a report card, but it did not contain the required information.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each CORE-participating district creates a local report card that complies with ED’s *State and Local Report Cards Under Title I, Part A* guidance, issued on February 8, 2013. Each of the CORE-participating districts must submit a template demonstrating how it will create a compliant report card based on 2013-2014 school year data.

#### Principle 3: Supporting Effective Instruction and Leadership

ED’s review of Principle 3 included a review of three areas: (1) Guidelines for Local Teacher and Principal Evaluation and Support Systems, (2) Implementation of Teacher Evaluation and Support Systems, and (3) Implementation of Principal Evaluation and Support Systems. Rather than describe the requirements for next steps in these areas, ED asks that the districts continue to work collaboratively, through CORE, to address the concerns highlighted in ED’s February 25, 2014 letter regarding developing the CORE guidelines for teacher and principal evaluation and support systems and implementing those systems in each participating district.

As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Sara Noguchi  
Superintendent  
Sacramento City Unified School District  
5735 47th Avenue  
Sacramento, CA 95824

Dear Superintendent Noguchi:

On February 10-13, 2014, a team from the U.S. Department of Education's (ED's) Office of Elementary and Secondary Education monitored the California Office to Reform Education (CORE) districts' implementation of its approved waivers under Section 9401 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Although there are eight districts participating in the joint waiver request, this visit was limited to a sample of four districts including: Fresno Unified School District, Los Angeles Unified School District, Oakland Unified School District, and Sacramento City Unified School District. The ED team also met with staff members from CORE. This monitoring aimed to continue the collaborative relationship that began during the waiver request approval process, provide ED with a deeper understanding of each district's goals and approaches to implementing ESEA flexibility, as well as CORE-wide goals and approaches, and ensure that the participating districts and CORE have the critical elements in place to continue implementation of their plan.

The review focused on the following elements:

- CORE-wide Systems and Processes, including Monitoring, Technical Assistance, Data Collection and Use, and Family and Community Engagement and Outreach,
- Transitioning to and Implementing College-and Career-Ready Standards,
- Developing and Administering High-Quality Assessments,
- Developing and Implementing a System of Differentiated Recognition, Accountability, and Support,
- Reward, Priority, Focus, and Other Title I Schools,
- Local Report Cards, and
- Teacher and Principal Evaluation and Support Systems.

ED staff facilitated a conference call with representatives of each of the participating districts on March 14, 2014 to share preliminary information from the on-site monitoring. Concerns included the following:

- CORE and the participating districts modified portions of the CORE waiver request and implemented those changes without ED's formal approval.
- Districts delayed and changed their strategies for implementing interventions in focus and priority schools.

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- Continued work is needed to develop CORE-wide guidelines for teacher and principal evaluation and support systems and to fully develop the School Quality Improvement Index.
- The districts appear to lack enforcement authority to ensure mutual accountability for implementing the plans outlined in the waiver request.

Through monitoring, ED learned that, in certain areas, the participating districts' implementation either did not meet ED's requirements or was inconsistent with the CORE request. These areas require the CORE participating districts to take certain next steps, as indicated below. Each of the participating districts must work collaboratively, through CORE, to respond to each of the next steps through the waiver extension process. ED expects that the participating districts will respond, through CORE, by including redlined changes to amend the CORE waiver request, or, where amendments to the request may not be warranted, providing a separate letter explaining how the participating districts have addressed or plan to address the issue.

### **CORE-Wide Systems and Processes**

ED's review of CORE-wide Systems and Processes included a review of four areas: (1) Monitoring, (2) Technical Assistance, (3) Data Collection and Use, and (4) Family and Community Engagement and Outreach. Next steps are required in two of these areas, as detailed below.

#### **Data Collection and Use**

As outlined in the CORE request, all participating districts are required to share their data with a third party vendor, the John W. Gardner Center for Youth and Their Communities at Stanford University (Gardner Center), for data aggregation and the production of reports available to CORE and the participating districts. The CORE request outlines a number of ways in which this information will be used. For instance, all focus schools are expected to use data from the Gardner Center to inform their selected interventions. During monitoring, the ED team learned that not all participating districts are currently sharing information with the Gardner Center.

As a next step, each of the participating districts must work collaboratively, through CORE, to articulate how and when all participating districts will work with the Gardner Center to make district-level data available for aggregation and reporting. The districts must also describe when and how each of the participating districts will use such data.

#### **Family and Community Engagement and Outreach**

The CORE request makes strong commitments to ensuring family and community engagement and outreach throughout the participating districts. Each of the participating districts is required to meaningfully engage and solicit input from teachers and principals and their representatives, as well as 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. During monitoring, the ED team learned of



concerns about district transparency about this engagement and the quality of such engagement and outreach in some participating districts.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide a description of current strategies to engage teachers and principals and their representatives, families, and communities, as well as how each participating district will ensure that family and community engagement is evaluated and monitored on a regular basis. This may include ensuring that the district stakeholder engagement plans submitted to CORE by April 15 of each year receive a rigorous review including progress against milestones in each district's plans and ensuring that each district engages in outreach to diverse stakeholder groups, including parents, teachers and their representatives, and other diverse organizations.

#### Additional Recommendation

In addition to the two next steps outlined above, ED recommends that CORE and the participating districts strengthen their monitoring efforts in order to ensure that each of the participating districts implements the CORE request with full fidelity. The participating districts may consider strengthening the district-to-district peer review process by which districts monitor each other for implementation of the plans outlined in the waiver request. This may include requiring districts to submit a District Implementation Plan on an annual basis, as this would increase the transparency of district plans and provide clear direction for conducting district-to-district monitoring.

#### Principle 1: College- and Career-ready Expectations for All Students

ED's review of Principle 1 included a review of two areas: (1) Transition to and Implement College- and Career-ready Standards, and (2) Develop and Administer High-Quality Assessments Aligned with College- and Career-ready Standards. Next steps are required in both areas.

##### Transition to and Implement College- and Career-ready Standards

As described in the CORE request, each participating district has a district-level implementation plan for implementing college- and career-ready standards. During monitoring, ED staff learned that the implementation plans outlined in the CORE request do not always match each district's current plans for implementing college- and career-ready standards.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the district-level implementation plans for implementing college- and career-ready standards outlined in the CORE request for all participating districts are accurately described throughout the CORE request reflecting the activities occurring at the district-level.

##### Develop and Administer High-Quality Assessments

Through the CORE request, each participating district agreed to participate in the Smarter Balanced Assessment Consortia. In accordance with the language in the request, however, each



of the CORE participating districts agreed to continue to administer the California Standards Tests (CSTs) in grades 2-11 for accountability purposes during the 2013-2014 school year. In the time since the CORE waivers were granted, California has discontinued its plans to administer the CSTs in the 2013-2014 school year.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose amendments to the CORE request to reflect the participating districts' plans to pilot the Smarter Balanced Field Test in 2013-2014 rather than administer the CSTs. The districts should propose amendments to all references to these test administrations throughout the request.

### **Principle 2: Differentiated Recognition, Accountability, and Support**

ED's review of Principle 2 included a review of six areas: (1) System of Differentiated Recognition, Accountability, and Support, (2) Reward Schools, (3) Priority Schools, (4) Focus Schools, (5) Other Title I Schools, and (6) Local Report Cards. Next steps are required in each of these areas, as detailed below.

#### **System of Differentiated Recognition, Accountability, and Support**

The CORE request describes the CORE School Quality Improvement System (SQIS). When the request was written, the SQIS was a work in progress. Because of the continued work needed to develop the SQIS, ED approved the CORE request with a condition. To continue to implement the waivers beyond the 2013-2014 school year, CORE's condition requires the districts to submit an amended joint request including the final version of the new SQIS by May 1, 2014. Through monitoring, ED staff learned that continued work is needed to address each of the three domains within the School Quality Improvement Index (SQII): the academic domain, the social-emotional domain, and the culture and climate domain.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide additional detail regarding the participating districts' plans in each of these domains. Such detail includes information about the specific measures that will be included in SQII scores and the weightings assigned to each of those measures. Since statewide assessment data will not be available for the 2013-2014 school year, CORE and the participating districts must propose to amend the CORE request to indicate how SQII scores will be calculated based on data from the 2013-2014, 2014-2015, and 2015-2016 school years, explaining how the three domains will be calculated and weighted to produce SQII scores based on data from each of those school years.

#### **Reward Schools**

The next steps required with regard to reward schools are described below.

##### ***Next Step 1: Partnering Strategy***

A fundamental tenet of the CORE request's system of support for priority school interventions is the partnering of reward schools with priority school partners. During monitoring, ED staff learned that less than half of the identified priority schools are partnered with a reward school.



Rather, ED staff learned that CORE decided to partner some priority schools with a non-reward school partner (*i.e.*, a network of schools, or an “other high performing school”) in order to better meet the priority school’s needs.

As a next step, each of the participating districts must work collaboratively, through CORE, to submit an amendment request for ED’s approval that articulates the current strategy for partnering reward schools with priority and/or focus schools (*i.e.*, explaining why only select reward schools are partnered and how those partnerships are determined). The participating districts must also explain the rationale for changing the previously approved method of partnering each priority school with a reward school partner.

#### *Next Step 2: Reward School Categories*

The CORE request clearly identified the participating districts’ method for identifying reward schools. Under the request, there are two categories of reward schools: Highest-performing and High-progress Title I schools. During monitoring, ED staff learned that CORE and the participating districts added an additional category of reward schools, “other high performing schools” to the partnership model.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose to amend the request to clearly define all categories of reward schools, including “other high performing schools” and define how those schools are partnered with priority and/or focus schools.

#### *Next Step 3: Reward School Recognition*

Under the CORE request, all reward schools are to be recognized on an annual basis. ED staff learned through monitoring that some districts have not recognized all identified reward schools. In one district there was a deliberate decision to not recognize one reward school. In another district none of the reward schools have been identified.

As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

##### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

##### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

*Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

Focus Schools

The next steps required with regard to focus schools are described below.

*Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

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implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

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Although it is not anticipated in most places in the CORE request that there will be partnering between reward and focus schools, there are some references to this strategy throughout the request. During monitoring ED staff learned that the CORE districts are not currently partnering focus and reward schools in a systematic way as part of their focus school strategy.

As a next step, each of the participating districts must work collaboratively, through CORE, to clarify how reward schools will be partnered with focus schools in future years and propose to amend the CORE request as necessary.

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In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating focus school will work with its advisory group to review and revise improvement plans as outlined in the CORE request.

#### *Additional Recommendation*

The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

#### Other Title I Schools

As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.



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#### Local Report Cards

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#### Principle 3: Supporting Effective Instruction and Leadership

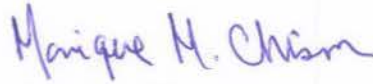
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As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Matthew Navo  
Superintendent  
Sanger Unified School District  
1905 Seventh Street  
Sanger, CA 93657

Dear Superintendent Navo:

On February 10-13, 2014, a team from the U.S. Department of Education's (ED's) Office of Elementary and Secondary Education monitored the California Office to Reform Education (CORE) districts' implementation of its approved waivers under Section 9401 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). Although there are eight districts participating in the joint waiver request, this visit was limited to a sample of four districts including: Fresno Unified School District, Los Angeles Unified School District, Oakland Unified School District, and Sacramento City Unified School District. The ED team also met with staff members from CORE. This monitoring aimed to continue the collaborative relationship that began during the waiver request approval process, provide ED with a deeper understanding of each district's goals and approaches to implementing ESEA flexibility, as well as CORE-wide goals and approaches, and ensure that the participating districts and CORE have the critical elements in place to continue implementation of their plan.

The review focused on the following elements:

- CORE-wide Systems and Processes, including Monitoring, Technical Assistance, Data Collection and Use, and Family and Community Engagement and Outreach,
- Transitioning to and Implementing College-and Career-Ready Standards,
- Developing and Administering High-Quality Assessments,
- Developing and Implementing a System of Differentiated Recognition, Accountability, and Support,
- Reward, Priority, Focus, and Other Title I Schools,
- Local Report Cards, and
- Teacher and Principal Evaluation and Support Systems.

ED staff facilitated a conference call with representatives of each of the participating districts on March 14, 2014 to share preliminary information from the on-site monitoring. Concerns included the following:

- CORE and the participating districts modified portions of the CORE waiver request and implemented those changes without ED's formal approval.
- Districts delayed and changed their strategies for implementing interventions in focus and priority schools.

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- Continued work is needed to develop CORE-wide guidelines for teacher and principal evaluation and support systems and to fully develop the School Quality Improvement Index.
- The districts appear to lack enforcement authority to ensure mutual accountability for implementing the plans outlined in the waiver request.

Through monitoring, ED learned that, in certain areas, the participating districts' implementation either did not meet ED's requirements or was inconsistent with the CORE request. These areas require the CORE participating districts to take certain next steps, as indicated below. Each of the participating districts must work collaboratively, through CORE, to respond to each of the next steps through the waiver extension process. ED expects that the participating districts will respond, through CORE, by including redlined changes to amend the CORE waiver request, or, where amendments to the request may not be warranted, providing a separate letter explaining how the participating districts have addressed or plan to address the issue.

### **CORE-Wide Systems and Processes**

ED's review of CORE-wide Systems and Processes included a review of four areas: (1) Monitoring, (2) Technical Assistance, (3) Data Collection and Use, and (4) Family and Community Engagement and Outreach. Next steps are required in two of these areas, as detailed below.

#### **Data Collection and Use**

As outlined in the CORE request, all participating districts are required to share their data with a third party vendor, the John W. Gardner Center for Youth and Their Communities at Stanford University (Gardner Center), for data aggregation and the production of reports available to CORE and the participating districts. The CORE request outlines a number of ways in which this information will be used. For instance, all focus schools are expected to use data from the Gardner Center to inform their selected interventions. During monitoring, the ED team learned that not all participating districts are currently sharing information with the Gardner Center.

As a next step, each of the participating districts must work collaboratively, through CORE, to articulate how and when all participating districts will work with the Gardner Center to make district-level data available for aggregation and reporting. The districts must also describe when and how each of the participating districts will use such data.

#### **Family and Community Engagement and Outreach**

The CORE request makes strong commitments to ensuring family and community engagement and outreach throughout the participating districts. Each of the participating districts is required to meaningfully engage and solicit input from teachers and principals and their representatives, as well as 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. During monitoring, the ED team learned of



concerns about district transparency about this engagement and the quality of such engagement and outreach in some participating districts.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide a description of current strategies to engage teachers and principals and their representatives, families, and communities, as well as how each participating district will ensure that family and community engagement is evaluated and monitored on a regular basis. This may include ensuring that the district stakeholder engagement plans submitted to CORE by April 15 of each year receive a rigorous review including progress against milestones in each district's plans and ensuring that each district engages in outreach to diverse stakeholder groups, including parents, teachers and their representatives, and other diverse organizations.

#### Additional Recommendation

In addition to the two next steps outlined above, ED recommends that CORE and the participating districts strengthen their monitoring efforts in order to ensure that each of the participating districts implements the CORE request with full fidelity. The participating districts may consider strengthening the district-to-district peer review process by which districts monitor each other for implementation of the plans outlined in the waiver request. This may include requiring districts to submit a District Implementation Plan on an annual basis, as this would increase the transparency of district plans and provide clear direction for conducting district-to-district monitoring.

#### **Principle 1: College- and Career-ready Expectations for All Students**

ED's review of Principle 1 included a review of two areas: (1) Transition to and Implement College- and Career-ready Standards, and (2) Develop and Administer High-Quality Assessments Aligned with College- and Career-ready Standards. Next steps are required in both areas.

##### Transition to and Implement College- and Career-ready Standards

As described in the CORE request, each participating district has a district-level implementation plan for implementing college- and career-ready standards. During monitoring, ED staff learned that the implementation plans outlined in the CORE request do not always match each district's current plans for implementing college- and career-ready standards.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the district-level implementation plans for implementing college- and career-ready standards outlined in the CORE request for all participating districts are accurately described throughout the CORE request reflecting the activities occurring at the district-level.

##### Develop and Administer High-Quality Assessments

Through the CORE request, each participating district agreed to participate in the Smarter Balanced Assessment Consortia. In accordance with the language in the request, however, each



of the CORE participating districts agreed to continue to administer the California Standards Tests (CSTs) in grades 2-11 for accountability purposes during the 2013-2014 school year. In the time since the CORE waivers were granted, California has discontinued its plans to administer the CSTs in the 2013-2014 school year.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose amendments to the CORE request to reflect the participating districts' plans to pilot the Smarter Balanced Field Test in 2013-2014 rather than administer the CSTs. The districts should propose amendments to all references to these test administrations throughout the request.

### **Principle 2: Differentiated Recognition, Accountability, and Support**

ED's review of Principle 2 included a review of six areas: (1) System of Differentiated Recognition, Accountability, and Support, (2) Reward Schools, (3) Priority Schools, (4) Focus Schools, (5) Other Title I Schools, and (6) Local Report Cards. Next steps are required in each of these areas, as detailed below.

#### **System of Differentiated Recognition, Accountability, and Support**

The CORE request describes the CORE School Quality Improvement System (SQIS). When the request was written, the SQIS was a work in progress. Because of the continued work needed to develop the SQIS, ED approved the CORE request with a condition. To continue to implement the waivers beyond the 2013-2014 school year, CORE's condition requires the districts to submit an amended joint request including the final version of the new SQIS by May 1, 2014. Through monitoring, ED staff learned that continued work is needed to address each of the three domains within the School Quality Improvement Index (SQII): the academic domain, the social-emotional domain, and the culture and climate domain.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide additional detail regarding the participating districts' plans in each of these domains. Such detail includes information about the specific measures that will be included in SQII scores and the weightings assigned to each of those measures. Since statewide assessment data will not be available for the 2013-2014 school year, CORE and the participating districts must propose to amend the CORE request to indicate how SQII scores will be calculated based on data from the 2013-2014, 2014-2015, and 2015-2016 school years, explaining how the three domains will be calculated and weighted to produce SQII scores based on data from each of those school years.

#### **Reward Schools**

The next steps required with regard to reward schools are described below.

##### ***Next Step 1: Partnering Strategy***

A fundamental tenet of the CORE request's system of support for priority school interventions is the partnering of reward schools with priority school partners. During monitoring, ED staff learned that less than half of the identified priority schools are partnered with a reward school.



Rather, ED staff learned that CORE decided to partner some priority schools with a non-reward school partner (*i.e.*, a network of schools, or an “other high performing school”) in order to better meet the priority school’s needs.

As a next step, each of the participating districts must work collaboratively, through CORE, to submit an amendment request for ED’s approval that articulates the current strategy for partnering reward schools with priority and/or focus schools (*i.e.*, explaining why only select reward schools are partnered and how those partnerships are determined). The participating districts must also explain the rationale for changing the previously approved method of partnering each priority school with a reward school partner.

#### *Next Step 2: Reward School Categories*

The CORE request clearly identified the participating districts’ method for identifying reward schools. Under the request, there are two categories of reward schools: Highest-performing and High-progress Title I schools. During monitoring, ED staff learned that CORE and the participating districts added an additional category of reward schools, “other high performing schools” to the partnership model.

As a next step, each of the participating districts must work collaboratively, through CORE, to propose to amend the request to clearly define all categories of reward schools, including “other high performing schools” and define how those schools are partnered with priority and/or focus schools.

#### *Next Step 3: Reward School Recognition*

Under the CORE request, all reward schools are to be recognized on an annual basis. ED staff learned through monitoring that some districts have not recognized all identified reward schools. In one district there was a deliberate decision to not recognize one reward school. In another district none of the reward schools have been identified.

As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

##### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

##### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

### *Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

### Focus Schools

The next steps required with regard to focus schools are described below.

### *Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that each district will ensure that all focus schools fully implement the intervention strategy outlined in the CORE request according to the timelines outlined in the request. As necessary, the districts should propose to amend the CORE request to accurately reflect the intervention strategy for focus schools in the CORE-participating districts (*i.e.*, clarify if districts will implement their own COPs rather than join CORE-facilitated COPs and explain how that work will be operationalized).

### *Next Step 2: Selection of Focus School Interventions*

In accordance with the CORE request, the participating districts with focus schools were to receive data reports from the Gardner Center that would be used to inform interventions based upon the particular needs at the school site. As explained under Data Collection and Use, above, through monitoring ED staff learned that not all participating districts are currently sharing information with the Gardner Center. Focus schools are also in the preliminary stages of selecting interventions, as some have yet to begin COP work. Based on the delay in this



implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the selected interventions at each focus school target the populations of students that led to the schools' identification as a focus school.

#### *Next Step 3: Focus School Partnering Strategy*

Although it is not anticipated in most places in the CORE request that there will be partnering between reward and focus schools, there are some references to this strategy throughout the request. During monitoring ED staff learned that the CORE districts are not currently partnering focus and reward schools in a systematic way as part of their focus school strategy.

As a next step, each of the participating districts must work collaboratively, through CORE, to clarify how reward schools will be partnered with focus schools in future years and propose to amend the CORE request as necessary.

#### *Next Step 4: School Site Council Engagement*

In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating focus school will work with its advisory group to review and revise improvement plans as outlined in the CORE request.

#### *Additional Recommendation*

The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

#### Other Title I Schools

As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating district meets the requirements for identifying and implementing interventions in other Title I schools that are not making progress against both AMOs and graduation rate targets, as outlined in the CORE request.

#### Local Report Cards

Under Assurance 7 in the CORE request, each participating district assured that reporting will occur annually on local educational agency (LEA) report cards, for the LEA and for each of its schools on local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the approved waivers’ annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. The assurance also provides that the LEAs will annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively. Through monitoring, ED staff learned that the participating districts are not meeting these requirements. Some LEAs were not able to produce a local report card. One district produced a report card, but it did not contain the required information.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each CORE-participating district creates a local report card that complies with ED’s *State and Local Report Cards Under Title I, Part A* guidance, issued on February 8, 2013. Each of the CORE-participating districts must submit a template demonstrating how it will create a compliant report card based on 2013-2014 school year data.

#### Principle 3: Supporting Effective Instruction and Leadership

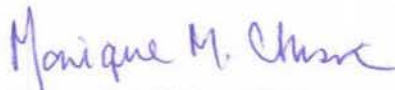
ED’s review of Principle 3 included a review of three areas: (1) Guidelines for Local Teacher and Principal Evaluation and Support Systems, (2) Implementation of Teacher Evaluation and Support Systems, and (3) Implementation of Principal Evaluation and Support Systems. Rather than describe the requirements for next steps in these areas, ED asks that the districts continue to work collaboratively, through CORE, to address the concerns highlighted in ED’s February 25, 2014 letter regarding developing the CORE guidelines for teacher and principal evaluation and support systems and implementing those systems in each participating district.

As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education



## UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

THE ASSISTANT SECRETARY

The Honorable Richard A. Carranza  
Superintendent  
San Francisco Unified School District  
555 Franklin Street  
San Francisco, CA 94102

Dear Superintendent Carranza:

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As a next step, each of the participating districts must work collaboratively, through CORE, to define a process to ensure that all identified reward schools in all participating districts were recognized as outlined in the request for the 2013-2014 school year and will be recognized in future years.

#### *Next Step 4: Reward School Professional Development*

The CORE request planned for specific professional development to be provided to reward schools to facilitate the partnership model, including a “Reward School Symposium”. ED staff learned that this event did not occur during the 2013-2014 school year, as the event was folded in to the CORE Partnership Institute.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that reward schools engage in the professional development activities as described



throughout the CORE request, or to propose to amend the CORE request to accurately reflect the participating districts' plans for such professional development in future years.

#### *Additional Recommendation*

During monitoring, ED staff learned of concerns that schools may not have been consulted about the meaningfulness of the rewards that are provided through the CORE request. One district indicated that some perceive the rewards as additional work rather than rewards. The participating districts should increase stakeholder engagement, especially at the school site level, to ensure that the rewards provided through the CORE request are meaningful recognition.

#### Priority Schools

The next steps required with regard to priority schools are described below.

##### *Next Step 1: Priority School Identification*

Under the CORE request, the total number of priority schools must be at least five percent of the Title I schools in the participating districts. Priority schools can include a Tier I or Tier II school under the School Improvement Grant (SIG) program that is using SIG funds to implement a school intervention model. However, any SIG school identified as a priority school is expected to be fully implementing a SIG model during its priority school implementation. Through monitoring, ED staff learned of a district that listed SIG schools that exited the SIG program in 2012-2013 as priority schools for the 2013-2014 school year. Since these schools exited SIG status before entering priority school status, these schools were inappropriately identified. ED staff also learned of this practice in another district (one of the non-monitored districts) prior to the monitoring event.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that all SIG-identified priority schools implemented a SIG model during the 2013-2014 school year. For any schools that did not (*i.e.*, schools that exited SIG status at the end of the 2012-2013 school year but were identified as priority schools for the 2013-2014 school year), the CORE districts may need to identify additional priority schools in order to ensure that the correct number of schools are identified and served.

##### *Next Step 2: Implementation of All Turnaround Principles in Non-SIG Priority Schools*

The CORE request requires that each non-SIG priority school implement specific interventions aligned with each of the turnaround principles beginning in the 2014-2015 school year. During monitoring, ED staff learned that, in one district, although all of the turnaround principles will be required, the school is planning to select interventions rather than implement those required by the CORE request. Further, it is not clear that there is a robust mechanism across the participating districts to ensure full implementation of all of the turnaround principles and the required interventions.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that all non-SIG priority schools will implement all of the turnaround principles as outlined in the CORE request beginning in the 2014-2015 school year. This should include a review of the planning that happened in each of these priority schools during the 2013-2014 school year to prepare for full implementation in 2014-2015.

### *Next Step 3: Partnering Strategy with Reward Schools*

As explained in the Reward School section of this letter, above, a fundamental tenet of the CORE participating districts' system of support for priority school interventions is the partnering of reward schools with priority school partners. The participating districts must work collaboratively, through CORE, to address the next step related to the partnering strategy.

### Focus Schools

The next steps required with regard to focus schools are described below.

### *Next Step 1: Focus School Intervention Strategy*

The CORE request explains that focus schools are required to join communities of practice (COPs) facilitated by CORE beginning in Fall 2013 as a key element of their focus school interventions. During monitoring, ED staff learned that the districts were not implementing this work as planned. CORE is no longer facilitating the COP structure. Instead, for the 2013-2014 school year, districts are implementing their own COPs, which did not necessarily follow the "Plan-Do-Study-Act" cycle outlined in the CORE request, and which were delayed in implementation. One district had not yet begun any COP work. It is clear that CORE and the participating districts have implemented changes to the focus school strategy. While these changes may have merit, they should not have been implemented without ED's approval through the amendment process.

As a next step, each of the participating districts must work collaboratively, through CORE, to provide evidence that each district will ensure that all focus schools fully implement the intervention strategy outlined in the CORE request according to the timelines outlined in the request. As necessary, the districts should propose to amend the CORE request to accurately reflect the intervention strategy for focus schools in the CORE-participating districts (*i.e.*, clarify if districts will implement their own COPs rather than join CORE-facilitated COPs and explain how that work will be operationalized).

### *Next Step 2: Selection of Focus School Interventions*

In accordance with the CORE request, the participating districts with focus schools were to receive data reports from the Gardner Center that would be used to inform interventions based upon the particular needs at the school site. As explained under Data Collection and Use, above, through monitoring ED staff learned that not all participating districts are currently sharing information with the Gardner Center. Focus schools are also in the preliminary stages of selecting interventions, as some have yet to begin COP work. Based on the delay in this



implementation, it does not appear that the participating districts have effective strategies in place to ensure that the selected interventions at each focus school target the populations of students that led to the school's identification.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that the selected interventions at each focus school target the populations of students that led to the schools' identification as a focus school.

#### *Next Step 3: Focus School Partnering Strategy*

Although it is not anticipated in most places in the CORE request that there will be partnering between reward and focus schools, there are some references to this strategy throughout the request. During monitoring ED staff learned that the CORE districts are not currently partnering focus and reward schools in a systematic way as part of their focus school strategy.

As a next step, each of the participating districts must work collaboratively, through CORE, to clarify how reward schools will be partnered with focus schools in future years and propose to amend the CORE request as necessary.

#### *Next Step 4: School Site Council Engagement*

In describing the strategy for focus school interventions, the CORE request explains that each focus school site is to work with its advisory group (such as a School Site Council) to undergo a self-review and needs assessment based on the data provided by the Gardner Center. As explained above, this data is not yet available to all participating districts. Additionally, not all districts are engaged in this type of consultation with advisory groups to inform focus school interventions.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating focus school will work with its advisory group to review and revise improvement plans as outlined in the CORE request.

#### *Additional Recommendation*

The participating districts should consider developing specific intervention strategies to increase the achievement of students with disabilities given the significant proportion of focus schools identified to serve these students.

#### Other Title I Schools

As described in the CORE request, all Title I schools are required to write a Single Plan for Student Achievement (SPSA) to identify interventions. The districts appear to monitor this process on a regular basis. However, while it appears that the districts require the SPSA to identify interventions based on progress against AMOs, ED staff learned that not all districts require the SPSA to identify interventions based on progress against graduation rate targets.



As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each participating district meets the requirements for identifying and implementing interventions in other Title I schools that are not making progress against both AMOs and graduation rate targets, as outlined in the CORE request.

### Local Report Cards

Under Assurance 7 in the CORE request, each participating district assured that reporting will occur annually on local educational agency (LEA) report cards, for the LEA and for each of its schools on local report cards, for the “all students” group and for each subgroup described in ESEA section 1111(b)(2)(C)(v)(II): information on student achievement at each proficiency level; data comparing actual achievement levels to the approved waivers’ annual measurable objectives; the percentage of students not tested; performance on the other academic indicator for elementary and middle schools; and graduation rates for high schools. The assurance also provides that the LEAs will annually report, all other information and data required by ESEA section 1111(h)(1)(C) and 1111(h)(2)(B), respectively. Through monitoring, ED staff learned that the participating districts are not meeting these requirements. Some LEAs were not able to produce a local report card. One district produced a report card, but it did not contain the required information.

As a next step, each of the participating districts must work collaboratively, through CORE, to ensure that each CORE-participating district creates a local report card that complies with ED’s *State and Local Report Cards Under Title I, Part A* guidance, issued on February 8, 2013. Each of the CORE-participating districts must submit a template demonstrating how it will create a compliant report card based on 2013-2014 school year data.

### Principle 3: Supporting Effective Instruction and Leadership

ED’s review of Principle 3 included a review of three areas: (1) Guidelines for Local Teacher and Principal Evaluation and Support Systems, (2) Implementation of Teacher Evaluation and Support Systems, and (3) Implementation of Principal Evaluation and Support Systems. Rather than describe the requirements for next steps in these areas, ED asks that the districts continue to work collaboratively, through CORE, to address the concerns highlighted in ED’s February 25, 2014 letter regarding developing the CORE guidelines for teacher and principal evaluation and support systems and implementing those systems in each participating district.

As explained throughout this letter, many areas may require the participating districts to propose amendments to the current CORE waiver request. Among other requirements, in order to amend the request each participating district is required to engage in stakeholder consultation. Each participating district is required to describe the process by which it consulted with stakeholders about the amendment request, including teachers and their representatives, parents, and other organizations such as community-based organizations and organizations representing students with disabilities and English Learners. Please do not hesitate to reach out to ED staff with any questions about the amendment process.



I look forward to continuing our work with you as you implement your requested waivers. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Leslie Clithero at [Leslie.Clithero@ed.gov](mailto:Leslie.Clithero@ed.gov) and Amy Bae at [Amy.Bae@ed.gov](mailto:Amy.Bae@ed.gov). Thank you for your continued commitment to improving educational outcomes for students in California.

Sincerely,



Monique M. Chism, Ph.D.  
Director  
Student Achievement and  
School Accountability Programs

Enclosure

cc: Rick Miller, Executive Director, California Office to Reform Education