



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

April 17, 2012

The Honorable Stefan Pryor  
Commissioner  
Connecticut State Department of Education  
165 Capitol Avenue, Room 303  
Hartford, Connecticut 06106

Dear Commissioner Pryor:

Thank you for submitting Connecticut's request for ESEA flexibility. We appreciate the hard work required to transition to college- and career-ready standards and assessments; develop a system of differentiated recognition, accountability, and support; and evaluate and support teacher and leader effectiveness. The U.S. Department of Education (Department) is encouraged that Connecticut and many other States are designing plans to increase the quality of instruction and improve student academic achievement.

As you know, Connecticut's request was reviewed by a panel of six peer reviewers during the week of March 26–30, 2012. During the review, the expert peers considered each component of Connecticut's request and provided comments in the form of Peer Panel Notes that the Secretary will use to inform any revisions to your request that may be needed to meet the principles of ESEA flexibility. The Peer Panel Notes, a copy of which is enclosed with this letter, also provide feedback on the strengths of Connecticut's request and areas that would benefit from further development. Department staff also have carefully reviewed Connecticut's request, taking into account the Peer Panel Notes, to determine consistency with the ESEA flexibility principles.

The peers noted, and we agree, that Connecticut's request was particularly strong in various ways, including: its use of a Statewide survey and well-structured ESEA flexibility request website to solicit input, the use of a strong and balanced accountability structure, its attempts to reduce duplication and unnecessary burden on its local educational agencies (LEAs), and the idea of allowing teachers and administrators in reward schools to take a sabbatical to share best practices.

At the same time, based on the peer reviewers' comments and our review of the materials Connecticut has provided to date, we have identified certain components of your request that need further clarification, additional development, or revision. In particular, significant concerns were identified with respect to the following:

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*The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.*

- Connecticut's proposed annual measurable objectives (AMOs) are based upon a potentially compensatory index that could mask the performance of low-performing students;
- Connecticut's flexibility request does not fully include schools that meet the ESEA flexibility definition of reward schools (*i.e.*, Connecticut does not identify "highest-performing schools" and does not provide any indication that graduation rate is a component of its reward schools); and
- Connecticut's capacity building proposal is largely dependent upon proposed legislation.

The enclosed list provides details regarding these concerns, as well as other key issues raised in the review of Connecticut's request, that we believe must be addressed before the Secretary can approve your request for ESEA flexibility. We encourage Connecticut to consider all of the peers' comments and technical assistance suggestions in making revisions to its request, but we encourage you to focus primarily on addressing the concerns identified on the enclosed list.

Additionally, Connecticut indicated that it plans to request the following additional waivers in its ESEA flexibility request that are not among the waivers that comprise ESEA flexibility: modifying accountability requirements for English Learners and students with disabilities and the Title III, AMAO Requirement 3. Please note that, although those additional waiver requests are not addressed in this letter, we will follow up with your staff in the coming days about the process for consideration of those requests.

Although the Peer Panel Notes for Connecticut provide information specific to your request, Connecticut also may benefit from comments and technical assistance suggestions made by other peer panels regarding issues common to multiple State educational agencies' (SEA) requests. For this reason, Department staff will reach out to Connecticut to provide relevant technical assistance suggestions and other considerations that may be useful as you revise and refine your request.

We remain committed to working with Connecticut to meet the principles of ESEA flexibility and improve outcomes for all students. We stand ready to work with Connecticut as quickly as possible. In order to ensure prompt consideration of revisions or additional materials, we are asking SEAs to submit those materials by May 1, 2012. Department staff will be in touch to set up a call as early as this week to discuss the timeline and process for providing revisions or materials.

You and your team deserve great credit for your efforts thus far, and we are confident that we will be able to work together to address outstanding concerns. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Sharon Hall, at 202-260-0998.

Sincerely,

Michael Yudin  
Acting Assistant Secretary

Enclosure

## SUMMARY OF ADDITIONAL INFORMATION REGARDING CONNECTICUT'S ESEA FLEXIBILITY REQUEST

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### CONSULTATION

- Please provide more specific information on the steps Connecticut took to meaningfully engage parents and community members of English Learners or describe how Connecticut will meaningfully engage with parents and community members of English Learners as it continues to develop and implement ESEA flexibility. *See Consultation Question 2.*
- Please provide the correspondence Connecticut received from its LEAs in response to this flexibility request. In the alternative, please indicate that Connecticut received no such correspondence.

### PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS

- Please provide additional information on the following activities related to the transition to college- and career-ready standards (CCSS), including:
  - Working with its institutions of higher education (IHEs) and other teacher and principal preparation programs to prepare for its transition to CCSS in mathematics. *See 1.B.*
  - Working with its IHEs and other principal preparation programs to provide training for principals to provide strong, supportive instructional leadership on teaching to the new standards. *See 1.B.*
  - Providing additional detail on Connecticut's plan to transition from assessing some students with disabilities using alternate assessments based on modified academic achievement standards to assessing these students using the State's high-quality assessments by 2014-2015. *See 1.B.*

### PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

- Please address concerns regarding Connecticut's proposed accountability system:
  - Please address concerns regarding accountability for individual ESEA subgroups, particularly the use of a combined subgroup, "the high-needs" subgroup which could mask the performance of ESEA subgroups, by providing additional safeguards for ESEA subgroups. *See 2.A.*
  - Please clarify how students taking Connecticut's alternate assessments based on alternate or modified academic achievement standards will be included in the accountability index. *See 2.A*
- Please provide AMOs that ensure that schools can meet the targets only by increasing the percentage of students at the proficient level of achievement. *See 2.B.*
- Please demonstrate that a reasonable number of schools that Connecticut has identified as reward schools using its proposed method meet the definition of reward schools in ESEA Flexibility. *See 2.C.i* and refer to the document titled *Demonstrating that an SEA's list of Reward, Priority, and Focus Schools Meet ESEA Flexibility Definitions.*
- Please demonstrate that Connecticut's proposed priority schools exit criteria are rigorous and will result in significant progress in improving student achievement (*i.e.*, provide explicit

definitions for key terms used in Connecticut’s priority schools exit criteria including: “sufficient” in “sufficient progress” and “sustained” in “sustained improvement” (p. 114). *See 2.D.v.*

- Please demonstrate that Connecticut’s new AMOs, along with other measures, are used to identify other Title I schools that are not making progress in improving the achievement of all students, including English learners and students with disabilities and closing achievement gaps, and to provide incentives and supports for those schools. *See 2.F.1.*
- Please address concerns regarding SEA, LEA, and school capacity:
  - Provide more specific information regarding how Connecticut will provide timely and comprehensive monitoring of LEA implementation of interventions in priority and focus schools. *See 2.G.i.*
  - Provide more information about the change in Connecticut’s ability to address SEA, LEA and school capacity should proposed legislation, required to implement its plan, not pass. *See 2.G.i.*

### **PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP**

- Please provide information about how Connecticut would use the results of its evaluation system for personnel decisions. *See 3.A.*
- Please provide more specific information concerning Connecticut’s plans to evaluate teachers in non-tested grades and subjects, particularly teachers of students with disabilities and English Learners. *See 3.B.*
- Please explain how Connecticut plans to work with teachers and administrators, or as appropriate, their designated representatives, in order to ensure each LEA develops, adopts, pilots, and implements evaluation and support systems. *See 3.B.*