



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

December 20, 2011

The Honorable John D. Barge
State School Superintendent
Georgia Department of Education
2066 Twin Towers East
205 Jesse Hill Jr. Drive SE
Atlanta, Georgia 30334

Dear Superintendent Barge:

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

As you know, Georgia's request was reviewed by a panel of seven peer reviewers during the week of December 5-9, 2011. During the review, the expert peers considered each component of Georgia's request and provided comments in the form of Peer Panel Notes to inform the Secretary's decision whether to approve Georgia's request. The Peer Panel Notes, a copy of which is enclosed with this letter, also provide feedback on the strengths of Georgia's request and areas that would benefit from further development. Department staff also reviewed Georgia's request, informed by the Peer Panel Notes, to determine consistency with the ESEA flexibility principles.

The peers noted, and we agree, that Georgia's request was particularly strong in Principle 1. Georgia described a comprehensive plan to transition to college- and career-ready standards. The plan includes strategic professional development on the new college- and career-ready standards, ensuring instruction addresses the needs of all students as the standards are implemented, increasing the rigor of the State's high school graduation requirements, replacing the State's current high school assessment with more challenging end-of-course assessments, and partnering with institutions of higher education to help ensure that students graduate high school college- and career-ready. The peers further noted appreciation for the efforts Georgia has put forward thus far in developing its new differentiated recognition, accountability, and support system and teacher and principal evaluation and support systems.

At the same time, based on the peer reviewers' comments and our review of the materials Georgia has provided to date, we have identified certain components of your request that need further

clarification and may need additional development or revision. In particular, significant concerns were identified with respect to the following:

- The need to complete development on elements of the State's proposed accountability system, including Georgia's proposal to delay fully implementing interventions;
- The extent of subgroup accountability in the new accountability system; and
- The lack of clear, coherent plans for developing or validating various components of the teacher and principal evaluation and support systems and implementing the systems statewide.

The enclosed list provides details regarding these concerns as well as all other issues raised in the review of Georgia's request. We encourage Georgia to consider the peers' comments and technical assistance suggestions in making revisions to its request.

Please keep in mind that while the peers identified weaknesses in all of the requests submitted by States during this first round of review, this result should be viewed in the context of the difficult, trailblazing work that Georgia and others are doing in the context of ESEA flexibility. 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 and provide Georgia with the requested flexibility.

At the same time, it is our responsibility to ensure that as we permit States to depart from the requirements of current law, they do so in a manner that continues to increase the quality of instruction and improve achievement for all students, but especially those most at risk of academic failure, including low-achieving students, English Learners, and students with disabilities.

While the Peer Panel Notes for Georgia provide information specific to your request, your State also may benefit from comments and technical assistance suggestions made by other peer panels regarding issues common to multiple States' requests. For this reason, we will soon send you a document that summarizes some of these technical assistance suggestions and other considerations that may be useful as you revise and refine your request.

We remain committed to working with Georgia to meet the principles of ESEA flexibility and improve outcomes for all students. We stand ready to work with Georgia as quickly as possible and 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. If you have any additional questions or want to request technical assistance, please do not hesitate to contact Victoria Hammer, at 202-260-1438.

Sincerely,

Michael Yudin
Acting Assistant Secretary

Enclosure

SUMMARY OF ADDITIONAL INFORMATION REGARDING GEORGIA'S ESEA FLEXIBILITY REQUEST

CONSULTATION

- Please provide more specific information on the steps Georgia took to meaningfully engage both teachers and their representatives, and diverse stakeholders and communities, or describe how Georgia will meaningfully engage teachers' representatives and other diverse communities as it continues to develop and implement ESEA flexibility. *See Consultation Questions 1 and 2.*

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

- Please address concern that the plan to transition to college- and career-ready standards provided limited information on professional development and support for principals to lead the transition work. *See 1.B., 2.A.i.c.*
- Please provide additional information regarding higher education's role in supporting the transition to college- and career-ready standards. *See 1.B.*

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

- Please address concern that the proposed accountability system will not be implemented until the 2013–2014 school year, one year later than the required timeline. *See 2.A.i, 2.A.i.d.*
- Please address concerns regarding the following components of Georgia's proposed accountability system that have yet to be determined, including:
 - Weighting of achievement, progress, and gap closure in overall college-and career-ready performance index (CCRPI) values;
 - Weighting of each indicator within achievement, progress, and gap closure in overall CCRPI determinations;
 - Performance targets for expected and exemplary benchmarks within the system; and
 - Growth model to be employed in the system, including whether it will measure growth for both proficient and non-proficient students.*See 2.A.i, 2.A.i.a, 2.A.i.b, 2.A.i.c.*
- Please address the concerns regarding various elements of Georgia's CCRPI, including:
 - Subgroup graduation rates are not incorporated into overall CCRPI determinations. *See 2.A.i, 2.A.i.a, 2.A.i.b.*
 - Subgroups are not considered in the achievement category of the CCRPI which, Georgia reported, will likely account for 70 percent of overall CCRPI score. *See 2.A.i, 2.A.i.a, 2.A.i.b.*
 - The number of indicators for which the State intends to provide a “flag” may be an obstacle to conveying a clear and coherent message regarding student performance. *See 2.A.i.a.*
 - The CCRPI indicators that the State will use to identify supports and interventions for elementary and middle schools for English Learners and students with disabilities. *See 2.A.i.b, 2.A.i.c.*
- Please address concerns regarding the identification of and interventions in priority, focus and reward schools, including:

- By demonstrating that the schools Georgia provided on its list of reward, priority, and focus schools align with the respective definitions of these schools provided in the document titled *ESEA Flexibility*. *See 2.C.ii, 2.D.ii, 2.E.ii.*
 - Clarify how, in the absence of clearly defined achievement and gap closure methods; reward schools can be identified for the 2012–2013 school year. *See 2.C.ii.*
 - Confirm whether or not schools currently being served by school improvement grant (SIG) funds will be counted toward the number of schools required to be identified as priority schools. *See 2.D.ii.*
 - Clarify that a number equal to at least 10 percent of Title I schools in 2010–2011 is identified as focus schools. *See 2.E.ii.a.*
- By clarifying that priority schools that begin to implement one of the four SIG models or interventions aligned with the turnaround principles will continue to do so for a period of three years. *See 2.D.iii.c.*
- The low exit criteria for priority and focus schools, including the achievement necessary to exit priority or focus status and the requirement that schools must meet these expectations for only one year. *See 2.D.v, 2.E.iv.*
- The lack of consideration of graduation rates in identifying a school as a focus school. *See 2.E.ii.*
- The lack of rigor of the cut point used to calculate school-to-State gaps in the identification of focus schools. *See 2.E.ii.*
- The lack of resources devoted to turnaround efforts in priority schools, including how resources will be leveraged and State or local funds will be repurposed to support the larger number of priority schools the State intends to identify. *See 2.G.iii.*
- Please address concerns regarding interventions and supports for other Title I schools not identified as priority or focus schools, including:
 - By describing plans to engage LEA leaders and build LEA capacity to address the needs of other Title I schools not identified as priority or focus. *See 2.F.*
 - By clarifying the expectations and incentives for other Title I schools not identified as priority or focus, including by addressing the concern that the primary mechanism for accountability appears to be solely public reporting and that AMOs are not used along with other measures to ensure continuous improvement. *See 2.F.*
 - The lack of strategies to build LEA capacity to turn around the lowest performing schools. *See 2.G.i.*
- Please describe how Georgia will hold LEAs accountable in the proposed differentiated recognition, accountability, and support system. *See 2.G.ii.*

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

- Please address the following concerns regarding Georgia’s plan for developing its teacher and principal evaluation and support system:
 - Please clarify how data generated from the evaluation and support system will be used to improve student achievement. *See 3.A.i, Option B.ii.*
 - With respect to the teacher and principal evaluation and support systems to be implemented statewide, please provide a high-quality plan that describes how Georgia will do the following:
 - Develop an operational framework, including activities that describe how the overall system will be implemented at the State, LEA, and school levels. *See 3.A.i, Option B.iv.*

- Validate the survey of instructional practice. *See 3.A.ii.c, 3.A.ii.c(i).*
- Complete development of the student growth measure and clarify whether or not all LEAs will use this growth measure. *See 3.A.ii.c, 3.A.ii.c(i).*
- Ensure implementation of teacher and principal evaluation and support systems in all LEAs, including the technical assistance that will be provided to all LEAs. *See 3.A.ii.c(ii), 3.B.*
- Please address the following concerns before Georgia submits its teacher and principal evaluation and support guidelines by the end of the 2011–2012 school year (note: these concerns do not need to be addressed prior to approval of ESEA flexibility):
 - How the evaluation and support system will link student achievement data and other elements of the system to positively impact instruction. *See 3.A.ii.a.*
 - How the performance levels will be applied within each of the components and combined to generate an overall performance rating. *See 3.A.ii.b.*
 - How the performance rating will be used to differentiate among educators contributing to increases in student growth or closing achievement gaps. *See 3.A.ii.b.*
 - Consider the rubric for setting student learning objectives (SLOs), provide evidence of the validity of the SLOs. *See 3.A.ii.c(iii).*
 - How Georgia will set expectations for evaluators to provide useful feedback to teachers and provide evaluators with the supports to do so. *See 3.A.ii.e.*
 - How the evaluation and support system will be used to inform personnel decisions (specify the decisions that it will inform). *See 3.A.ii.f.*