



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

ASSISTANT SECRETARY

AUG 16 2012

Honorable Janet Barresi
Superintendent of Public Instruction
Oklahoma State Department of Education
Hodge Education Building
2500 North Lincoln Boulevard
Oklahoma City, OK 73105

Dear Superintendent Barresi:

I am writing in response to Oklahoma's request to amend its approved ESEA flexibility request. As you know, on February 9, 2012, the Department of Education (Department) approved Oklahoma's ESEA flexibility request through the 2012–2013 school year, subject to Oklahoma's finalizing its administrative rules for implementing its A-F school grading system. On July 27, 2012, Oklahoma submitted an amended ESEA flexibility request to satisfy this condition. The amended request incorporates the final administrative rules for Oklahoma's A-F school grading system and makes conforming changes as well as several other changes consistent with the principles of ESEA flexibility.

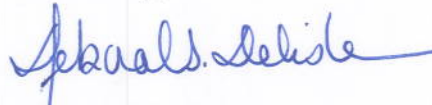
I am pleased to approve Oklahoma's amended request. In doing so, I am removing the condition from Oklahoma's ESEA flexibility request and am extending approval of Oklahoma's request through the 2013–2014 school year. At that time, Oklahoma, like other States with approved requests, may request an additional extension of these waivers through the 2014–2015 school year. Oklahoma's amended request will be posted on the Department's website. A summary of Oklahoma's amendments is enclosed with this letter. Any further requests to amend Oklahoma's ESEA flexibility request must be submitted to the Department for review and approval.

Oklahoma continues to have an affirmative responsibility to ensure that it and its districts are in compliance with Federal civil rights laws that prohibit discrimination based on race, color, national origin, sex, disability, and age in their implementation of ESEA flexibility as well as their implementation of all other Federal education programs. These laws include Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act, the Age Discrimination Act of 1975, and requirements under the Individuals with Disabilities Education Act.

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I am confident that Oklahoma will continue to implement the reforms it proposed under its approved ESEA flexibility request, as amended, and advance its efforts to hold schools and school districts accountable for the achievement of all students. If you have any questions regarding the implementation of your ESEA flexibility request, please do not hesitate to contact Sharon Hall of my staff at Sharon.Hall@ed.gov.

Sincerely,



Deborah S. Delisle

Enclosure

cc: Kerri White, Assistant State Superintendent

Amendments to Oklahoma's Approved ESEA Flexibility Request

The following is a summary of amendments to Oklahoma's approved ESEA flexibility request. The Department is approving the following amendments because Oklahoma's ESEA flexibility request, as amended, satisfies the condition placed on Oklahoma's initial approval and continues to be aligned with the principles of ESEA flexibility.

Please refer to the Department's website

(www.ed.gov/admins/lead/account/stateplans03/index.html) for Oklahoma's complete ESEA flexibility request.

- **Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (Element 2.A)**

Revision: For the 2012–2013 school years, Oklahoma will use its adopted and approved A-F grading system as its state-based system of differentiated recognition, accountability, and support. The amendment explains how the A-F grading system will be used to identify reward, priority, and targeted intervention schools and provides detail on the metrics and weightings of all components within the new system. Oklahoma also made corresponding changes in other sections of Principle 2.

- **Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (Element 2.A)**

Revision: Oklahoma clarified the factors used to determine “Grade +” and “Grade –” in the A-F grading system. Specifically, instead of requiring that all administrators in a building be rated “effective” for the school to receive a “Grade +”, Oklahoma will require that the head principal be rated “effective” before a school can receive a “Grade +.”

- **Methodology for Identifying Priority Schools (Element 2.D.i)**

Revision: Oklahoma will provide an opportunity for an LEA to review data and make corrections or seek an appeal of a school's grade and designation as a priority school.

- **Priority School Interventions (Element 2.D.iii)**

Revision: Oklahoma will require that teachers in priority schools participate in professional development identified as appropriate by the Oklahoma State Department of Education. Teachers in C³ schools will participate in all professional development and interventions required of other priority schools unless the State Director determines that equivalent interventions are already being provided.

- **Priority School Exit Criteria (Element 2.D.v)**

Revision: Oklahoma will include a requirement that a priority school cannot exit status if the school is still in the bottom five percent of schools in the State based on student achievement or has a graduation rate below 60 percent, even if the school receives a grade of A, B, or C.

- **Methodology for Identifying Focus Schools (Element 2.E.i)**

Revision: Oklahoma will not use the A-F grading system to determine focus school status. Instead, those schools will be identified using an achievement gap analysis consistent with the definition of “focus school” in *ESEA Flexibility*.

- **Methodology for Identifying Focus Schools (Element 2.E.i)**

Revision: Oklahoma will provide an opportunity for LEAs to review data and make corrections or seek an appeal of a school’s grade and designation as a focus school.

- **Focus School Interventions (Element 2.E.iii)**

Revision: Oklahoma will require that teachers in focus schools participate in professional development identified as appropriate by the Oklahoma State Department of Education. Oklahoma also clarifies that focus schools should direct resources and interventions to meet the needs of low-achieving students, including students in the subgroup(s) for which the school was identified.

- **Focus School Exit Criteria (Element 2.E.iv)**

Revision: Oklahoma will allow a focus school to exit status once the school meets the AMO targets for the subgroup(s) for which it was identified for two years, provided that the school would not be identified as a focus school based on the performance of any other subgroup.

- **Provide Incentives and Supports for Other Title I Schools (Element 2.F)**

Revision: Oklahoma will label “Grade D” schools as “targeted intervention” schools. Those schools will be required to implement interventions aligned with the turnaround principles within 12 months of initial identification, unless the school raises its grade to a “C” to demonstrate significant improvement.