



UNITED STATES DEPARTMENT OF EDUCATION  
OFFICE OF THE DEPUTY SECRETARY

March 12, 2014

The Honorable Lincoln Chafee  
Office of the Governor  
State House  
Providence, Rhode Island 02903-1196

Dear Governor Chafee:

I am writing in response to Rhode Island's request to amend its approved Race to the Top grant project, including revisions to the project period to implement a portion of its plan. Between January 21 and March 5, 2014, the State submitted documentation to and held conversations with the U.S. Department of Education (Department) to support amendment requests to its approved Race to the Top plan. As you are aware, the Department has the authority to approve amendments to your plan and budget, provided the revisions do not change the overall scope and objectives of the approved proposal. In March 2013, the Department issued "Amendment Requests with No-cost Extension Guidance and Principles" indicating the process by which amendments containing requests to provide additional time for a grantee to accomplish the reform goals and deliverables it committed to in its Race to the Top application and approved Scope of Work would be reviewed and approved or denied. To determine whether approval could be granted, the Department has applied the conditions and elements specific to no cost extensions noted in the document, and compared it with the Race to the Top program *Principles* included in the "Grant Amendment Submission Process" document issued to Governors of grantee States in October 2011.

I approve the following amendments, including an extension to the time period for implementation of three projects, as described below.

- Shift \$523,054 from Year 3 contractual to Year 4 contractual in the Standards and Assessments budget to account for timing of actual vendor payment. The State reports that the content and timeline for this work remains unchanged.

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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.*

- Increase the Instructional Management System (IMS) contractual budget by \$824,275 for Year 4. Part of this increase includes \$356,000 in contractual funds within this budget from Year 3 to account for timing of actual vendor payment. The remainder of the new Year 4 funds come from Year 3 and anticipated Year 4 savings in the Multiple Pathways project, which are available because fewer students engaged with virtual mathematics coaches than anticipated. The increase in Year 4 contractual funds will support development of a sustainable IMS, as described in the no-cost extension amendment request below.
- For the IMS project, extend the project period from September 23, 2014, to July 1, 2015, Year 5. During the grant period the State committed to develop an IMS to provide LEAs with access to data dashboards, professional development and interim assessments. Throughout Years 2 and 3 the State worked with the vendor to create and implement a system that met the State and LEA's needs, but encountered challenges related to updating student information, scoring and reporting for interim assessments and supporting LEA use. In addition, the vendor announced in summer 2013 that it would no longer support the instructional component of the IMS after the grant period. During Year 3 and Year 4 the State began implementing alternative methods of providing LEAs access to the resources currently housed in the IMS, as described in a February 3, 2014, amendment letter. During the extended period the State will develop, pilot and implement a new IMS using an alternative vendor. The work will proceed in three phases and result in a system that provides the original functionality that the State intended to provide LEAs through Race to the Top. The new system will eventually provide LEAs with more functionality than the State originally planned for, including access to instructional materials. Some LEAs will pilot the new functionality in late-spring 2014 and will continue to be involved in the development throughout Year 5.
  - Shift \$993,750 to the IMS project-level budget to support personnel, fringe, contractual and indirect costs in Year 5. These funds will support State staff to work with LEAs during the transition to the new IMS, in addition to \$796,000 in contractual funds to support the rebuild through June 2015. Funds are available for this Year 5 budget from Year 3 and anticipated Year 4 savings in the State and Local Capacity and the Induction project-level budgets. In the State and Local Capacity budget, the State realized savings from staff turnover, contracts that came in under budget and unspent supplemental funding for participating LEAs. In the Induction budget, the State realized savings from unfilled vacancies at the State-level due to diminished workloads that have been transferred to existing staff.
  - The State reports that the new approach to the IMS will produce a sustainable system where the State controls the code and has capacity to make changes within existing and new systems.
- For the Quality Teacher Professional Develop Options project, extend the project period from September 23, 2014, to July 1, 2015. In the State's approved Scope of Work the State planned to procure and develop a professional development

platform in Year 4 to track educators' participation in professional development, rate the quality of offerings and match professional development opportunities to educators based on performance. The State reports that it will have access to a vendor's system in March 2014 and will spend Year 5 enhancing the system.

- Shift \$579,750 to the educator evaluation system budget to support Year 5 activities. These funds will support State staff to provide vendor oversight and support LEAs in using the systems, and indirect costs. In addition, the Year 5 budget includes \$200,000 for the professional development platform enhancements and \$200,000 for the evaluation system licensing fees. Funds are available from Year 3 and anticipated Year 4 savings. The State will move the Quality Teacher Professional Development Options project into the evaluation systems budget for Year 5.
- It is the Department's understanding that the costs associated with supporting the technology system for educator evaluations will become part of the State's budget after the extension period.
- For the Struggling Schools project, extend the project period from September 23, 2014 to July 1, 2015. During the grant period the State provided leadership teams from struggling schools with a summer institute opportunity. However, school teams reported that the training would be better received and attended if provided during the school year. Rather than provide another summer institute, the State will provide professional development and onsite coaching opportunities to identified schools during Year 5.
  - Shift \$350,151 to support activities in Year 5. These funds are available from unspent Year 3 and anticipated Year 4 savings within this project budget.
  - The State owns the professional development course content associated with this extension request and will continue to make it available to all schools beyond the grant period.
- For the State and Local Capacity budget, extend the project period from September 23, 2014 to July 1, 2015 to support \$132,500 in personnel and fringe for State staff to provide oversight for the Year 5 activities described above. These funds are available from Year 3 and anticipated Year 4 savings within this project budget.

In order to consider amendment requests with no-cost extensions, the Department indicated that States must address the timelines and implications of the amendment on the 50 percent LEA subgrants (i.e., allocations to participating LEAs), as well as the process the State will use to review LEA subgrant requests to obligate and liquidate funds after the current project period. Through conversations with Rhode Island and documentation submitted as part of this amendment request, we understand that the State will review requests from participating LEAs to extend the project period to complete Race to the Top activities on a case-by-case basis. The Department generally approves the State's process as described in Appendix 1. No later than August 1, 2014, the Department expects the State to submit a record of each participating LEA project

approved by the State for a no-cost extension and the total funding approved for LEAs' Year 5 Scopes of Work.

It is our understanding that this amendment and no-cost extension will not result in a change in your State's performance measures and outcomes, nor will they substantially change the scope and objectives of the work. Please note that we expect grantees with no-cost extensions to liquidate all funds by September 1, 2015, given that by law all Race to the Top funds revert to the U.S. Department of Treasury as of October 1, 2015. The State must request and receive approval to move forward with no-cost extensions for any additional projects. This letter will be posted on the Department's website as a record of the amendments.

If you need any assistance or have any questions regarding Race to the Top, please do not hesitate to contact Rhode Island's Race to the Top Program Officer, Monika Bandyopadhyay, at 202-260-2531 or [monika.bandyopadhyay@ed.gov](mailto:monika.bandyopadhyay@ed.gov).

Sincerely,

//s//

Ann Whalen  
Director, Policy and Program Implementation  
Implementation and Support Unit

cc: Commissioner Deborah Gist  
Mary-Beth Fafard

**Appendix 1. Process Rhode Island will use to review LEA subgrant requests to obligate and liquidate funds after the current project period, as described by the Rhode Island Department of Education (RIDE).**

In December 2013, Rhode Island provided all LEAs with an update of their fiscal activity and remaining grant award, including direct allocations and state supplemental funds. The State also requested that all LEAs bring their cash reimbursements up-to-date by January 15, 2014 so that the State could gain a more accurate picture of remaining funds and the feasibility of all funds being expended prior to September 2014. Based on the quarterly projections and reimbursements submitted, majority of Rhode Island LEAs have plans to fully spend out their subgrants prior to the conclusion of Year 4. Additionally, all LEAs have fully met their commitments under Race to the Top in terms of participation in the initiatives and projects outlined in their Scope of Work under the Instructional Improvement Systems. Because there were no direct allocations provided to LEAs for the IMS and Interim Assessments, LEAs do not have remaining funds in that area. However, LEAs did have set-aside funds directed toward the design and development of the IMS and the Interim Assessments. These set-aside funds were combined with SEA allocated funds to procure the identified vendors for the IMS. The identified vendors carried out their contractual work in Years 2-4. Therefore, at this time, Rhode Island does not anticipate that the state will extend the LEA subgrants in their original configuration into the no-cost extension period.

In the event that LEA funds (both direct allocations and set-asides) are not fully spent down at the conclusion of Race to the Top Year 4, Rhode Island will use the following LEA subgrant process:

- *Rhode Island will notify all LEAs of the opportunity to request a no-cost extension to support the use of data utilizing the tools and data made available through the SEA's extension request.*  
If an LEA believes that additional time and funding would be beneficial to expand and deepen collaborative work within or across districts in the use of data, the LEA may request an extension that results in revisions to goals, activities, timelines, and budgets that support the commitments originally made in the LEA Scope of Work for System of Support Two: Instructional Management System. This request will result in a continuation of the Partnership Agreement contained within the LEA Scope of Work that the LEA entered into for Years 1-4. LEAs who request an extension will be asked to resign the existing Partnership Agreement extending the time-period.
- *LEAs will submit an extension request that aligns with and supports Rhode Island's overarching strategic priority of using data to drive decision making, as it pertains to the following areas:*
  - Training and support on the resources, tools, and reports made available through the rebuilt Instructional Management System;
  - Furthering the use of data and data-driven decision making as supported by the data reporting made available from the new solution as well as other data systems developed under RTT;
  - Creation of common assessments aligned to Common Core State Standards utilizing the Interim Assessment item bank and new Instructional Management System; and,
  - Understanding student data as compared to other data sources, including: growth on state-wide assessments, local assessment results, Student Learning Objectives and other components of educator effectiveness, and achievement and discipline

data.

- *The request will identify clear deliverables and activities and, where applicable, how the work will further support collaboration within or across LEAs in Rhode Island.*  
All LEA requests must include timelines for activities that ensure all funds will be obligated by June 30, 2015 and liquidated by September 1, 2015. Additionally, the request must include a clearly defined plan as to how the impact of the work will be sustained (and, if appropriate, completed) after the timeframe of the no-cost extension. The request should also explain the activities already under way in the district which ensure that educators will have access to the technology and data, or how this work will support other related initiatives to support the expansion of data use in the district during the 2014-2015 school year.
- *RIDE will review and approve individual extend LEA subgrant requests to obligate and liquidate funds in the no-cost extension period.*
  - The review process will be similar to the current budget and scope of work amendment process. LEAs' no-cost extension requests will be reviewed by the project and program managers and the budget auditors/analysts.
  - Rhode Island will follow a similar process used when awarding competitive grants (e.g. professional learning community grants, compensation grants) when communicating with LEAs. The documented decision will be submitted in writing to the LEA as part of the subgrant approval letter, with clearly outlined expectations and commitments for the no-cost request.
  - If approved, the LEA must submit a revised budget amendment, inclusive of quarterly expenditure targets and if appropriate, the revised budget, into the electronic system for approving LEA budget and cash reimbursement requests. As part of that process, both RIDE and the LEA superintendent or head of school will sign off on the request.
- *The Race to the Top Team will determine LEA eligibility to receive a no-cost extension based on:*
  - A demonstrated history of programmatic participation and commitment to implementing its existing scope of work as determined by the district's overall assessment on its quarterly progress update reports and the district's level of participation in Race to the Top engagement and training opportunities made available during Years 1-4.
  - The district's commitment to providing all educators with access and support to the technology and data currently available.
  - Fiscal responsibility, as demonstrated by the timely and accurate submission of reports, including completion and quarterly expenditure reports, as well as the district's pattern of submitting cash reimbursement requests to date.

RIDE will encourage LEAs to submit applications to the Rhode Island Department of Education signifying their proposal for a no-cost extension by June 30, 2014. This deadline allows LEAs ample time to view the Phase I functionality, and to consider how they would utilize that functionality to support data use in the 2014-2015 school year. This early date will also allow Rhode Island sufficient time to review, request clarification, if needed, and notify LEAs of our intention to fund their request in part or full once the available funding is determined.

Rhode Island intends to continue to monitor LEA spending of their grant funds, and will adjust this process and the deadlines described based on the State's understanding of unspent funds. At the latest, we envision that following the December 2014 deadline for cash reimbursements, unspent funds will be withdrawn from all LEAs and pooled together for redistribution to LEAs who received approval for their no-cost extension request based on the Title 1 allocation formula.