Race to the Top

Technical Review Form - Tier 1

Oklahoma Application #3850OK-10

A. State Success Factors

	Available	Tier 1
(A)(1) Articulating State's education reform agenda and LEA's participation in it	**65**	**48**
(i) Articulating comprehensive, coherent reform agenda	5	4
(ii) Securing LEA commitment	45	32
(iii) Translating LEA participation into statewide impact	15	12

(A)(1) Reviewer Comments: (Tier 1)

A 1 i - Oklahoma's application sets forth a deep need for education reform. The agenda presented is focused by implementing efforts in the education areas described in the guidelines in order to ensure quality education for all the state's students. The centerpiece of the effort is a Teacher and Leader Effectiveness Evaluation System which is supported by the state's longitudinal data system, an aligned web based instructional improvement system coupled with supports for change, strategies for improving persistently low achieving schools, and adoption of more rigorous standards and assessments. The State articulates a systemic six goal plan to accelerate school improvement that aligns with the four core areas of Race to the Top (RttT) reform.

A 1 ii - The memorandum of understanding (MOU) follows the Federal model and all 278 participating LEA superintendents signed the document "without material modification" and agreed to implement all areas of the State's Plan. It is unclear why only 49% of Board presidents of participating LEAs signed the MOU with the State, nor what significance that has for the achievement of the goals set forth in the Scope of Work although it suggests that a critical mass of support may not be present.

A 1 iii - Just over half (52%) of Oklahoma's LEAs are signators to the State MOU for RttT. Importantly, both Oklahoma City Public Schools and Tulsa Public Schools—the two largest districts and the districts with more than half of the persistently lowest-achieving schools in the State are participating LEAs. These two districts educate more than 30% of all OK public school students and have, as per the application, over 50% of students in poverty. Of 532 LEAs 278 agreed to participate representing 69% of the State's schools and 81% of the student population. While the primary education labor associations in the State submitted letters of strong support, only 26% of local union leadership signed the MOU.

By 2015 the State projects that, for the 80% of Oklahoma's students in districts participating and committed to RttT goals, the improvements on the National Assessment of Educational Progress (NAEP) will include:

- Scaled scores improving by a minimum of 9 points across all subgroups;
- Achievement gaps between/among racial groups close by half;
- High School graduation rates (4 year rates) increase to 84% from 76% (2009);
- College enrollment increases from 58% (2007) to 77.5%; and
- Completion of a year's worth of college credit within two years of enrolling will increase 10% per year.

Theses are ambitious goals and they impact a majority of the State's students in poverty, however the application does not give any explanation as to the context of the non-signators and how their absence from the table may influence statewide impact.

(A)(2) Building strong statewide capacity to implement, scale up, and sustain proposed plans	**30**	**26**
(i) Ensuring the capacity to implement	20	17
(ii) Using broad stakeholder support	10	9

(A)(2) Reviewer Comments: (Tier 1)

A 2 i -

Oklahoma's Proposed Plan relies heavily on the requirements of SB 2033 "The Teacher and Leader Effectiveness Act." The applicant states on p.49 that the bill was "passed with bipartisan support". Alternatively, it is suggested that the Bill still awaits final support, "presuming that the legislation passes and is signed by the Governor (footnote #1 to the Draft Overview of Oklahoma's Plan,dated 5/24/2010, and found in the Appendix). Clarification is needed here.

The application refers to SB 2033 as the backbone of the plan which builds on the State's previous reform initiatives and its experience administering large-scale grant projects including Oklahoma's *Education Reform Act of 1990* and, more recently the 2005 *Achieving Classroom Excellence Act* (ACE). The State of Oklahoma, in 2009, raised the bar of proficiency on ESEA tests of reading and mathematics in grades 3-8 to parallel the proficiency markers of the National Assessment of Educational Progress (NAEP) and to better prepare students for the exit exams required to achieve an Oklahoma high school diploma.

Structurally the applicant proposes creating a network of supports for the work going forward. These include:

- A dedicated RttT cross-functional team within SDE, led by an RttT Director reporting directly to the State Superintendent.
- A STEM Coordinating Council coordinated by the State's Race to the Top Commission created in SB 2033. The Commission has key responsibility with regard to the state's new uniform evaluation system (TLE) making recommendation to the State Board of Education;
- P-20 Data Coordinating Council;
- Quality Assessment & Accountability Task Force;
- Educational Quality and Accountability Board; and
- The Oklahoma Commission for Teacher Preparation (OCTP) which will oversee an independent evaluation of professional development

The development of units tasked with authority and functions across most areas pertinent to the RttT goals is a positive step toward creating an important supportive structure.

It is notable that the application explicitly states that policy decisions and funding will be based on the OCTP's evaluations as regards preparation programs. Other such connections to policy and funding are less apparent. Absent too are descriptions of the processes necessary to ensure the intent expressed here can be implemented.

Oklahoma's overall budget structure for Race to the Top centers around eight budget projects, plus the 50% LEA allocation, and is designed to support attainment of its reform agenda. Other state and local funds will be leveraged in support of Race to the Top reform plans.

The application notes and is commended for "sizeable financial commitments and leadership assistance form public-private partnerships" (Appendix A 2-b) which they anticipate will be ongoing.

A 2 ii - More than 500 stakeholders attended six regional meetings to provide RttT input and Oklahoma received over 150 letters of support from various organizations including labor organizations, national

education leaders, chambers of commerce, and local businesses. Letters of support from "Indian Tribes" are noted in the narrative but other minority group support is not apparent.

The support of local and national philanthropies to Oklahoma's education reform effort has been significant.

(A)(3) Demonstrating significant progress in raising achievement and closing gaps	**30**	**23**
(i) Making progress in each reform area	5	5
(ii) Improving student outcomes	25	18

(A)(3) Reviewer Comments: (Tier 1)

A 3 i -In 2006-2007 the college-preparatory/work-ready high school graduation requirements became the requirement for all students (Achieving Classroom Excellence Act of 2005 - ACE). The ACE Act provided a framework and funding for implementation of more rigorous standards, curriculum, and assessments. In June 2009, the State raised its State assessment cut-scores on the Oklahoma Core Curriculum Tests at grades 3-8 to mirror those of NAEP. Since 1998,Oklahoma has fully funded Pre-K standards based programs for all students whose parents choose to enroll them, regardless of income, and is one of only two states in the nation to do so. The State moved from 13th to 9th in the nation on the 2010 *Quality Counts* measure of Standards, Assessments and Accountability. The State's prioritization of the longitudinal data system (the WAVE) is highlighted throughout the application. Tulsa Public Schools was awarded $1. 5 M by the Gates Foundation to accelerate the rollout of a teacher effectiveness system including a new evaluation tool that can inform the State's Teacher Leader Evaluation (TLE) system. Oklahoma has made progress intervening in its lowest achieving schools through its Comprehensive School Improvement System, provides comprehensive and data-driven support for all struggling schools, and as of Spring 2010 this System is supported and aligned with *WISE*—a web-based platform for school improvement planning and design. The State's School Support Teams (SST) assist all schools in need of improvement in areas of reading/language arts, mathematics, attendance, graduation rate, and for identified subgroups.

Oklahoma appears poised to build on these accomplishments to date.

A 3 ii- The proficiency benchmarks have recently changed (Oklahoma raised the cut-scores on all ESEA reading and mathematics tests in grades 3-8 in order to raise student achievement expectations and mirror NAEP proficiency markers). Oklahoma's low-income and minority students have seen greater improvements in their NAEP math scores from 2005 to 2009 than their peers nationwide. The average score for Oklahoma's eighth grade low-income and Black students has improved during this time period by 12 points. The State notes that these improvements reflect the impact of the "increased State's standards and assessments on student learning, as well as the increased intervention by the Oklahoma State Department of Education in struggling schools (and the) professional development...targeted to teachers and principals to eliminate the achievement gap—especially in the State's lowest achieving schools" (p.90). However, student achievement in reading as well as graduation rate data reflect stagnation or at the most small incremental increases. The implementation of the RttT plans, as well as programs and legislation that are part of the larger effort, suggest the potential for greater achievement gains going forward.

Total	125	97

B. Standards and Assessments

	Available	Tier 1
(B)(1) Developing and adopting common standards	**40**	**40**

(i) Participating in consortium developing high-quality standards	20	20
(ii) Adopting standards	20	20

(B)(1) Reviewer Comments: (Tier 1)

B 1 i & ii -

Oklahoma has been an active participant in the National Governor's Associations/Council of Chief State School Officers (NGA/CCSSO) initiative to develop a set of Common Core State Standards (CCSS). The State Department of Education (SDE) has reviewed the draft standards against current state standards and the Governor is committed to adoption by emergency rule no later than August 1, 2010. (See Appendix B1-A regarding adoption).

(B)(2) Developing and implementing common, high-quality assessments	**10**	**10**
(i) Participating in consortium developing high-quality assessments	5	5
(ii) Including a significant number of States	5	5

(B)(2) Reviewer Comments: (Tier 1)

B 2 i & ii

The applicant has joined Achieve's Partnership for Assessment of Readiness for College and Careers (PARCC) to develop high-quality assessments aligned with the Common Core Standards. Twenty–seven (27) states are partnered in this effort. In 2009 OK raised the State's cut-scores on all ESEA reading and math tests in grades 3-8 to mirror NAEP proficiency scores. The applicant states this as an indicator of Oklahoma's commitment to assessment standards that are rigorous. The application is explicit about the state's support of Achieve's efforts and a commitment to work with the partners to pursue a common assessment strategy aligned to the CCSS.

(B)(3) Supporting the transition to enhanced standards and high-quality assessments	**20**	**16**

(B)(3) Reviewer Comments: (Tier 1)

In 2005 the State Legislature enacted the Achieving Classroom Excellence (ACE) Act and participation in the American Diploma Project. The resultant implementation of high standards in a college-preparatory/work ready high school curriculum and experience with high school exit exams provides Oklahoma with a strong background in which to frame the work going forward. By 2011-2012 the State plans to have curriculum and assessment standards from P-20 aligned to the CCSS, launch a web-based instructional toolkit (conceptually based on their current *PASSport* system), establish ACE and ADP Academies to train educators in the improvement of instruction, develop an online tool for preparing, administering and analyzing formative and interim student assessments (supported by work with the Achieve Partnership). A significant means of monitoring fidelity to the CCSS will be through third party examination of the real work of college students in selected courses. This is an interesting, grounded means of determining the initiatives level of success.

The plans in this section are very ambitious and appear heavily dependent upon outside expertise and a web based system. In-State implementation support primarily rests with the Master Teachers Project. Other professional development efforts appear minimal – especially the "repurposing" of the SDE regional annual conferences in light of what is known about the lack of impact from one time meetings. Other more routine gatherings, such as subject area meetings that might be tasked with refocusing their offerings are not mentioned. More detailed information about the activities, materials, etc. that will enable practitioners to make these ambitious changes is needed.

Total	70	66

C. Data Systems to Support Instruction

	Available	Tier 1
(C)(1) Fully implementing a statewide longitudinal data system	**24**	**16**

(C)(1) Reviewer Comments: (Tier 1)

Oklahoma's statewide longitudinal data system (SLDS) will be fully compliant with the America Competes Act. The narrative suggests that "the SLDS fulfills nine of the twelve elements...with partial completion of the three remaining specifications" (p. 114). The more detailed explanation chart (pp 114 – 116) notes that "full implementation" for #4, 9, 11 and 12 are anticipated December 2011.

It appears that OK has fully completed eight (8) of the elements with the four (4) remaining components to be completed by December, 2011. While the applicant states that "most of the information" for #12 is available completion by the December 2011 date is dependent upon RttT dollars.

(C)(2) Accessing and using State data	**5**	**4**

(C)(2) Reviewer Comments: (Tier 1)

C 2 - The State will provide stakeholders with easy, one-stop access to a full spectrum of available data through the State's longitudinal data system (the WAVE). The application clearly lists the objectives to improve accessibility by combining and enhancing multiple education data systems,creating multiple stakeholder specific "access portals" and ensuing data governance and quality which supports decision makers and encourages stakeholder feedback. A vendor will be engaged to design the portal and the New York City data system is noted as meeting the OK design criteria. Implementation is anticipated mid-2011 and the complete roll out by 2012.

The application provides a clear vision of an aligned data system that will be used to improve instructional outcomes. It includes a creative and "customized GPS for school improvement." A web-based business intelligence tool WISE (Ways to Improve School Effectiveness) will assist educators in focusing on areas in need of improvement which can provide significant impact on student learning (see Appendix C2-A, WISE Planning and Coaching Tool). It is unclear how this will impact policy and how it will be monitored.

(C)(3) Using data to improve instruction	**18**	**14**
(i) Increasing the use of instructional improvement systems	6	6
(ii) Supporting LEAs, schools, and teachers in using instructional improvement systems	6	5
(iii) Making the data from instructional improvement systems available to researchers	6	3

(C)(3) Reviewer Comments: (Tier 1)

C 3 i - The State presents a coherent and credible plan for building educators capacity to use data to improve instruction. The plan is focused by three strategies: 1) ensuring implementation of the Instructional Improvement System (IIS) for all participating LEAs 2) utilizing regional and LEA dedicated data coaches and assessment team trainers to support the effective use of IIS and 3) making the data accessible to researchers. The plans build off a successful experience in one district which used a similar technology based system (gains in the model LEA outpaced the statewide average by 17%).

ii - The primary data in Oklahoma's IIS will be comprised of formative, interim and summative assessments aligned to the Common Core State Standards. Where there are no assessments, there is a plan to have both the State and LEAs engage in development. This data will provide educators with information to improve instruction as well enable LEAs to provide professional development (PD) related

to areas of need. Building the capacity of educators to fully utilize the system involves the rollout of a 400 person in-state network to become master data trainers. They will add training capacity reaching beyond the six regional data coaches (and assessment team trainers) noted above. Additionally, LEAs will be "encouraged' to use RttT funds to hire dedicated data coaches.

A significant degree of capacity building will need to occur at the earliest stages of grant implementation if timelines are to be met. The application states that coaches will be deployed, principals trained and professional learning communities formed. Clarifying details as to how use of the system across all stakeholder groups will be monitored is unclear as is whether there will be incentives or consequences to encourage utilization of the system.

iii - Researchers will have access to the system through web tools but It is not clear if there will be a secure portal dedicated to researchers. There is scant information provided beyond noting that SDE will sponsor an open process designed to connect research needs with the capabilities of the education research community in the Summer of 2011.

Total	47	34

D. Great Teachers and Leaders

	Available	Tier 1
(D)(1) Providing high-quality pathways for aspiring teachers and principals	**21**	**15**
(i) Allowing alternative routes to certification	7	5
(ii) Using alternative routes to certification	7	5
(iii) Preparing teachers and principals to fill areas of shortage	7	5

(D)(1) Reviewer Comments: (Tier 1)

D 1 i & ii - The application states that Oklahoma has four alternative routes for teachers, (e.g.Teach for America, and Troops for Teachers) and one for principals and has had an alternative certification law since 1990. In 2009 35% of teachers and just over 4% of principals received their certification through an alternative route. Two of these alternative routes are national programs and the application notes they are independent of IHEs. The other two programs are not clearly noted as independent of or nested in an IHE.

The alternative certification program for principals still appears to demand involvement in a traditional administrative preparation program.

While the percentage of teachers certified through an alternative route is high (35%) the existence of only two in-state alternative programs (one for principal candidates) may be suggestive of a challenging environment for these programs.

D 1 iii -Since 1982 the SDE has addressed teacher and principal shortages by conducting periodic surveys to determine shortage areas. This is not a proactive approach to filling shortage areas. The application suggests however that the new Teacher Leader Evaluation system (TLE) will enhance the State's ability to monitor, evaluate and identify shortage areas by establishing a feedback loop to preparation programs, offering incentives to recruit and retain teachers in hard to staff subject areas, increasing TFA hires and ramping up PD in areas of need. Several IHE's are also working to prepare teachers for urban areas and Teachers-Teachers.com provides a State wide educator recruitment service.

Consideration does not seem to have been given to supporting the path of professionals from other fields into teaching.

(D)(2) Improving teacher and principal effectiveness based on performance	**58**	**44**

(i) Measuring student growth	5	4
(ii) Developing evaluation systems	15	11
(iii) Conducting annual evaluations	10	8
(iv) Using evaluations to inform key decisions	28	21

(D)(2) Reviewer Comments: (Tier 1)

D 2 i & ii - OK's plan for improving teacher and principal effectiveness is based on the establishment of a statewide teacher and leader performance-based evaluation system - TLE; the development of a clear definition of effectiveness that will include 50% student growth measures for teachers of all subjects coupled with 50% qualitative measures; the development of assessments in areas not currently tested by the State; and the aligning of PD with TLE evaluations. All data gathered will be shared through the State's longitudinal data system.

The RttT Commission will oversee a process for determining how to measure student growth for each grade and class. These student growth and educator effectiveness measures will be developed in collaboration with a broad stakeholder group, predominately educators and their associations, and engage a consultant with policy expertise. Upon its completion every LEA in the State will be required to use the same evaluation measures.

This is a very ambitious effort with many interim goals including statewide evaluation of every teacher in every grade in every subject by 2014-2015. The applicant notes that the TLE is proposed to be a five tier system and also notes that currently there are "limited grades and subjects for which there are standardized tests." Given the multiple challenges encountered nationally in reaching agreement among disparate stakeholders concerning standards of practice and standards for content areas and assessments the completion date target seems unrealistic.

D 2 iii - The TLE requires an annual evaluation of all teachers and principals regardless of whether they are a participating RttT LEA or not. The Teacher and Leader Effectiveness Act requires feedback be timely and include data on student growth. An online portal to the IIS will provide this data within a short turnaround time from entry. SDE will develop and provide training to all individuals using the new evaluation system. Refusal to comply with the evaluation provisions has financial consequences for the LEA.

The application does not speak to the challenges in ensuring annual evaluations actually occur nor propose any means of distributing responsibilities for what in most states is a resource intensive process that is frequently completed at a perfunctory level given the limited personnel statutorily empowered in this role.

D 2 iv – Senate Bill 2033 requires that teachers and principals who are ineffective as measured by the TLE, and who do not improve over a limited time, will not be retained. All career decisions concerning educators are to be determined by TLE results. Coupled with a $1.5m Gates Foundation grant to the Tulsa Public Schools the State will fund half and philanthropy the other half of an additional $1.2m to pilot the TLE and build an evidence base on the efficacy of incentive pay programs to improve student outcomes. SB 2033 also requires LEAs to document how they will use evaluation data from the TLE to inform professional development and to report TLE results publicly. Participating LEAs must implement instructional coaching or other job embedded PD. Finally, The SDE's *Ways to Improve School Effectiveness (WISE)* tool will connect practitioners to activities that align with needs highlighted by the evaluation. The efficacy of these PD efforts will be mapped and inform SDE's certification system for all PD that is funded by RttT dollars.

This is a systemic plan for using evaluation results to inform decisions along a career continuum for principals and teachers. A great deal is based on a yet to be developed system for evaluating educator effectiveness and more information is needed concerning the design and development of the tools and the system. Resources needed may exceed those allotted since successfully reaching the goals delineated may well require experts in the evaluation and technology fields for whom there will be a highly competitive market. Moreover, how the State will ensure the development of highly sophisticated systems

to ensure frequent and full stakeholder engagement is not specifiec. The goals here, given the timeline, may be more aspirational than realistic.

(D)(3) Ensuring equitable distribution of effective teachers and principals	25	21
(i) Ensuring equitable distribution in high-poverty or high-minority schools	15	13
(ii) Ensuring equitable distribution in hard-to-staff subjects and specialty areas	10	8

(D)(3) Reviewer Comments: (Tier 1)

D 3 i & ii – The application speaks movingly about the Tulsa Public Schools where a detailed analysis discovered that every non-highly qualified teacher in the district was assigned to a high-need school. It is anticipated that SB 2033 will change this reality across the State.

OK's primary interventions for closing the gap in the equitable distribution of excellent educators across high poverty, high minority schools and hard to staff subject areas rests on the TLE, the statewide performance evaluation system, as an instrument for forcing the exit of ineffective teachers and principals, making public the distribution of these educators, and providing professional development and access to instructional improvement tools and processes. Additionally, LEAs will receive support in hiring and retaining of effective teachers in high need school and subject areas, be required to submit measures of the distribution of highly effective educators and by 2014-2015 participating LEAs must equalize the distribution of effective teachers or face accreditation and regulatory consequences. A five year timeline for full implementation is discouraging. The State is commended on their movement from measuring "qualified" educators to "effective" educators.

The application describes a system of well aligned and integarated efforts including: instructional coaching for teachers (a similar commitment to coaching of principals is not noted) as well as removal of those deemed ineffective, SDE development of a competitive grant program for incentive pay, an increase in the number of TFA teachers in high needs schools, and increased public awareness and public accountability . Additionally, there are positive assurances that TLE use will be monitored through regular, state-mandated checks.

The multiple strategies for addressing problems of inequitable distribution of teachers and leaders and the challenges of finding effective teachers in hard to staff subject areas is well developed. Consideration does not appear to have been given to opening pathways for non-traditional professionals to enter the field of teaching and leadership, particularly in light of STEM gaps.

(D)(4) Improving the effectiveness of teacher and principal preparation programs	14	11
(i) Linking student data to credentialing programs and reporting publicly	7	7
(ii) Expanding effective programs	7	4

(D)(4) Reviewer Comments: (Tier 1)

D 4 i & ii - The application states that Oklahoma's teacher and principal preparation programs will be improved by utilizing the State performance evaluation system data to measure the effectiveness of program completers in improving student achievement. These data will be publicly reported and state accreditation and certification authority will be granted or withheld based on these results. Effective programs will be supported with expansion opportunities. The application notes a commitment to support continuously improving programs.

The application lacks details to explain what support for IHE "partners" will involve. Additionally, this linear plan is heavily dependent upon communicating to stakeholders and assuming the "market" will encourage changes. Details about intervening steps, key activities prior to closing programs, would be helpful here. There is no discussion of a district role in improving and being accountable for improving preparation

programs. Research has shown that where districts and IHE programs are real partners, district needs are better met, candidates better prepared and P12 students better served.

(D)(5) Providing effective support to teachers and principals	**20**	**14**
(i) Providing effective support	10	7
(ii) Continuously improving the effectiveness of the support	10	7

(D)(5) Reviewer Comments: (Tier 1)

D 5 - Oklahoma's plan notes five strategies and related activities that will provide effective support to teachers and principals. These strategies link the State with the LEAs as the State will certify best practice programs from which LEAs can choose and/or they must develop and submit to the SDE a locally developed comprehensive PD plan. WISE , developed in partnership with the National Center on Innovation, provides web based tools linked to TLE results and school improvement goals thus supporting school reform and individual educator development.

Other examples of support include: a) a novice principals assistance program b) a Principal's Academy, c) University of Oklahoma K20 Center focusing on providing PD for school-wide systemic change and technology integration d) the provision of STEM related PD to every participating LEA; and e) data coaches coupled with instructional improvement teams.

The chart - D (5) Summary - outlines activities in this area that appear heavily dependent upon technology and web-based tools and less so on the one on one that research suggests is vital for improving individual effectiveness. Absent from the plan are strategies for forming collaboratives for purposes of sharing best practices, state and national opportunities for sharing and other efforts that encourage an exchange of successes and challenges through professional networks.

D 5 ii - To ensure PD is effective a system for certifying PD offerings will be launched Summer of 2011. This PD clearinghouse will assess both the delivery and participant student outcomes of PD offerings. Evaluation results will be published annually and only high impact programs will retain certification. LEAs will be required to choose from or develop their own PD.

Certifying PD at the State level provides one level of support for the districts but there appears to be little guidance to district and school leadership concerning what constitutes high value training and how to develop it in-house. In this section there is insufficient detail as to the support to be given or the activities planned for principals and teachers who will be implementing, assessing and continuously improving instructional practices based on the PD received. The heavy dependence upon web based activities, WISE in particular, may need to be reassessed in light of research and field experience that clearly establishes the necessity of educators having consistent face to face interactions to ensure positive change occurs.

Total	138	105

E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	**10**	**10**

(E)(1) Reviewer Comments: (Tier 1)

Senate Bill 268, passed in May 2009, grants the state the authority to require the alternative governance of any school identified as in need of improvement for four consecutive years. This law also provides the State Board of Education the right to assume control of the school in certain instances. The Board also has the

authority and regulatory processes to intervene if schools and districts do not make AYP for two consecutive years after an improvement plan is implemented.

(E)(2) Turning around the lowest-achieving schools	**40**	**35**
(i) Identifying the persistently lowest-achieving schools	5	5
(ii) Turning around the persistently lowest-achieving schools	35	30

(E)(2) Reviewer Comments: (Tier 1)

E 2 – i & ii - The state has defined and identified the "persistently lowest-achieving schools" and that definition was approved by USDOE. Only four of the participating LEAs have persistently low achieving schools although twenty schools from eleven districts, with more than half located in Tulsa and Oklahoma City school district, were identified including non-Title I eligible secondary schools.

Oklahoma's plan for turning around the lowest achieving schools recognizes the highly systemic nature of the various efforts to be implemented. The State will support LEAs and low performing schools by providing a consultant to devise a model staffing initiative, coaching and feedback to schools utilizing the Comprehensive School Improvement System, expanding available data to identify effective teachers, providing on-site data facilitators, establishing a train the trainers model for Instructional improvement.

Several inter-related initiatives that will support turnaround include: a) a new state statute which prevents LEAs from assigning or retaining ineffective teachers in the lowest achieving schools; b) a Turnaround Leadership Academy to prepare a pool of educators for work in these schools, c) a set of criteria for turning around schools that mirror the Mass Insight Model including the formation of intervention clusters; d) partnering with experts who can assist LEAs in planning for and delivering on different facets of the change (e.g. schedules that include planning time, community and parent engagement, leader mentoring, academic and student su pport services, etc.) e)establishment of a Turnaround Unit at the SDE whose multiple support roles are delineated in the application f) web-based planning tools with a proven track record of success (in VA). How these multiple strategies will coalesce into a strategic plan is unclear.

Proposed achievement goals for these turnaround schools are bold. All 20 identified as persistently low achieving schools will initiate one of the four school intervention models by 2010 and be out of intervention mode by 2014.

The challenge in having a narrowly targeted population for intervention (20 schools with the focus of effort in two districts) will be in making this have statewide impact . $18,600,000 is budgeted for this effort (Budget Summary Narrative)and the applicant notes that this focus is potentially the most resource efficient and impactful approach for the State. However, a high level of success would certainly engage others in the near future.

Lessons have been culled from the handful of schools in which "turnaround" has been initiated. The chart on pp.235-236 notes that two were successful but there is no data to establish the definition of "success." The applicant notes that there has not been sufficient progress in the State around turnaround. Lessons garnered to date appear minimal.

Total	50	45

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	**10**	**7**

(i) Allocating a consistent percentage of State revenue to education	5	3
(ii) Equitably funding high-poverty schools	5	4

(F)(1) Reviewer Comments: (Tier 1)

F 1 i & ii - In FY-2008 and FY-2009, 53%of the State's budget was directed to all levels of public education: K-12, career-tech and higher education. The actual dollar amounts used in support of education increased over that year but the percentage of total State appropriations was unchanged. State support for all three levels of public education was $3.73 billion in FY-2009 and $3.69 billion in FY-2008.

A complex calculation takes into account three cost differences: (1) differences in the cost of educating various types of students; (2) differences in transportation costs; and (3) differences in the salaries districts must pay teachers. This formula proportionately withholds State funds from districts with a greater ability to raise local/county revenues but does not speak to how LEAs will be required to distribute funds to low achieving schools.

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	**40**	**29**
(i) Enabling high-performing charter schools "(caps)"	8	6
(ii) Authorizing and holding charters accountable for outcomes	8	6
(iii) Equitably funding charter schools	8	8
(iv) Providing charter schools with equitable access to facilities	8	4
(v) Enabling LEAs to operate other innovative, autonomous public schools	8	5

(F)(2) Reviewer Comments: (Tier 1)

F 2 i - v

Legislation around charter schools was significantly revised in 2010. Under Senate Bill 1862, charter schools may now be authorized in **any** district that has a school on the State's School Improvement list as identified by the State Board of Education under the No Child Left Behind Act of 2001 **or** in any LEA with 5,000 or more students and in a county with at least 500,000 residents. The State no longer has an annual cap on the number of new charter schools that may be authorized. Charter school governance arrangement is one of the five turnaround options available. The applicant references 18 charter schools in the Oklahoma, 14 applications made from 2005-2009 and nine denied. Although the State is working toward improving policies and conditions that support charter schools, to date the limited number of schools (18) may indicate a somewhat challenging environment for charter initiatives.

The State grants charter schools increased autonomy in return for direct accountability. As such, charter schools' contracts must include criteria by which effectiveness of the school will be measured, including explicit and rigorous student performance standards. State law also requires that charter schools report accountability data comparable to other public schools. There is limited detail as to accountability criteria. The applicant states that "contracts must include criteria by which effectiveness of the school will be measured, including explicit and rigorous student performance standards" (p. 249). A more robust discussion of accountability standards for charter schools would be helpful.

No charters have been closed by the State.

Charter schools receive State funding through the State Aid funding formula set by law. Notably, the per student allocation is the same amount as the State allocates for other schools in the district in which they are cited, less up to five percent of the state-aid formula which may be retained by the sponsoring district as a fee for administrative services. The applicant notes that the state has been recognized as one of only 16 states considered to have "Fiscally and Legally Autonomous Schools, with Independent Public Charter School Boards." Charter schools' per-pupil funding can exceed the per-pupil funding of non-charter schools

since charter schools' state aid formula is *not* subject to the "chargeables" (the deductions) based upon local, county and state dedicated revenue.

The narrative notes that the "State law does not impose any facility-related requirements on charter schools that are stricter than those applied to traditional public schools." The information provided in the application concerning support for charter facilities is limited.

Oklahoma's application notes that the State has many "innovative public schools including enterprise schools, magnet and other specialty schools allowed under the state's deregulation and statutory waiver procedures," which were established in 1992. Based on the descriptions these appear to be traditional rather than innovative structures and formats.

(F)(3) Demonstrating other significant reform conditions	**5**	**3**

(F)(3) Reviewer Comments: (Tier 1)

Oklahoma's focus on early childhood education is significant and includes standards based pre-K programs inclusive of certification requirements for teachers. These programs are voluntary and have been in place for over a decade engaging over 80% of the State's four year olds. Longitudinal and ongoing studies conducted by Georgetown University have found a positive correlation between students in the program and academic growth in the Tulsa District. Smart Start Communities is another early childhood education effort as is Educare which provides toddler education.

The application also calls attention to a time review task force as a consequence of Oklahoma having the shortest school year in the nation. As a result, significant new ways of considering instructional time have emerged.

The emphasis on early learning efforts is significant and commendable. While there are, throughout the application, mention of other reform conditions, as example an early warning system to identify students at risk of dropping out, the response provided in this section, overall, appears limited.

Total	55	39

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1
Competitive Preference Priority 2: Emphasis on STEM	**15**	**15**

Competitive Reviewer Comments: (Tier 1)

There are several extant initiatives in the State including the Oklahoma School of Science and Mathematics (OSSM) which was one of Oklahoma's first statewide STEM education initiatives. Begun in 1990 it has expanded to 14 regional OSSM education centers across the State. How effective these are is not discussed. A commitment to grow current STEM initiatives is threaded throughout the application and includes incentives for teaching in STEM areas and providing focused PD to enhance instructional skills in these areas. (See final Appendix entry.) The Governor will form a STEM Coordinating Council whose first priority will be to create an inventory of STEM assets around the State and develop a plan with timelines and responsibilities to increase the development of STEM partnerships, collaboration and awareness, particularly among women and minorities.

Total	15	15

Absolute Priority - Comprehensive Approach to Education Reform

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		**Yes**
Absolute Reviewer Comments: (Tier 1) Oklahoma's application sets forth a six goal plan to accelerate school improvement that aligns with the four core areas of RttT reform. The application process has spurred new legislation that supports the restructuring of the SDE to support state wide engagement in implementing more rigorous standards and assessments and refining an accountability system for students and educators. The environment for charter schools has been made more accommodating and plans for reform are aligned across the education system. One caveat is the lack of a fully developed plan for turnaround.		
Total		0

Grand Total	500	401

Race to the Top

Technical Review Form - Tier 1

Oklahoma Application #3850OK-5

A. State Success Factors

	Available	Tier 1
(A)(1) Articulating State's education reform agenda and LEA's participation in it	**65**	**55**
(i) Articulating comprehensive, coherent reform agenda	5	5
(ii) Securing LEA commitment	45	40
(iii) Translating LEA participation into statewide impact	15	10

(A)(1) Reviewer Comments: (Tier 1)

The state response provides clear articulation for it reform plans that is evidenced by:

- Legislative actions that support state reform include the Oklahoma Teacher and Leader Effectiveness Act of 2010, that reflects support for great teachers and leaders, and the revisions to the Oklahoma Charter Schools Act (Appendix A1- A, Senate Bill 2033 Teacher and Leader Effectiveness Bill of 2010; A1-G, House Bill 2753, and A1-H Senate Bill 1862) that's supported by stakeholders in educational and business associations. Additional legislative actions include
  - The Standards-based reform law of 1990
  - College-and-Career-Readiness reform law of 2005 (Appendix A1-D)
  - Senate Bill 222 supporting America Competes Act
  - Senate Bill 2033 linking student performance to teachers and leaders to Oklahoma State Regents from Higher Education (OSRHE)
  - House Bill 2753 supporting successful conditions for high-performing charters and innovative school models
- The state's goals for implementing reform are articulated around each of the four State Reform Agenda items.
- The state's picture of Oklahoma's Race to the Top in August 2012 is aligned within each of the State Reform Conditions Criteria and provides the status of education for schools and/or charters, students, teachers and leaders.
- The correlation of the state's poverty data, and research reflecting education and poverty are inversely related.
- The Achieving Classroom Excellence (ACE) Legislative Task Force includes support for the four education areas described in ARRA (Appendix A1-C).
- ED WEEK Quality Counts 2010 references the state as one of fifteen states to have adopted college and career and work readiness for high school graduation (Appendix A1-D).

Therefore the state's response reflects that it has effectively met the criterion for a comprehensive and coherent reform agenda.

(ii) The state's response reflects that the LEAs are committed to the State's plan and is evidenced by:

- The Memorandum of Understanding (MOU) language indicates that "In order to participate, the Local Education Agency (LEA) must agree to implement the plan." The response reflects that the statement of "all or significant portions" was removed from the standard MOU which weakens the extent to which the LEAs are committed to the state's plans.

- The state has support from the two largest districts representing approximately 87,000 K-12 students with 63,000 of those students in poverty.
- Approximately 52% of the state's LEAs are participating. 100% of those LEAs responded Yes to using the Standard Terms and Conditions. Approximately 47% of LEAs responded Yes to participating in each of the applicable Plan Criterion while approximately 53% of LEAs responded with Conditional to criterion (D)(2)(iv)(b), (D)(3)(i), and (D)(3)(ii). Two hundred and seventy-eight superintendents provided MOU signatures.
- Signatures from local boards of education and local teacher unions, 49% and 26% respectively, reflect less than 100% of participation which weakens the extent to which the boards and teacher unions are committed to the state's plans.
- The state received approximately 105 letters of support from a broad group of stakeholders that include those such as the National Association for the Advancement of Colored People (NAACP), two state education agencies, two future candidates for state superintendent, state school agencies, higher education, Native American tribal leaders, chambers of commerce, business leaders, public school superintendents, state legislators and other key educational stakeholders. Notable quotes reflecting commitment to the state's proposed reform effort include:
    - "This application builds a framework that will equal a globally competitive educational system."
    - "During the past six months, statewide planning and discussion surrounding the development of a plan for RTTT has brought unprecedented cooperation between education, business, and community interests."
    - "Nowhere in the nation is there more alignment. Nowhere is there a greater recognition of the need to improve. Nowhere is there more bipartisan willingness to make major changes."

Therefore the evaluation for the criterion is within the high range. The change in the standard MOU limits the extent of the commitment of participating LEAs while the range of signatures from local boards of education and local teacher unions demonstrate limited leadership support.

(iii) The ability for the RTTT plan to translate into broad statewide impact is evidenced by:

- Summary Table for (A)(1)(iii) reflects that the state's Race to the Top (RTTT) plan has 52% (278 of 532) of the state's LEAs signed up as a Participating LEAs representing 69 % (1225 of 1783) of the state's schools and 81% of the student population. The standard MOU closely correlates the federal MOU with minimal modification and indicates "In order to participate, the parties agree that the LEA must agree to implement the plan." The two largest districts and the districts with more than half of the persistently lowest-achieving schools in the state are signed up as participating LEAs. Labor organizations support the state's application as evidenced by the signatures of 39 leaders of local teacher unions (Appendix A1-P, A1-L). Of the participating districts, 148 will collectively bargain in criteria (D)(2)(iv)(b), (D)(3)(i), and (D)(3)(ii). The response indicates that pursuant to state law all LEAs, whether participating or not, will use evaluations to inform career status and retention (Senate Bill 2033). The 278 participating LEAs represent 82% of the student population supporting a large statewide impact. Only four of the Participating LEAs have persistently low-achieving schools with each agreeing to participate. Fifty-four percent of the students in Participating LEAs are in poverty as compared to 56% of students in poverty for all state LEAs. The state has support from the two largest districts representing approximately 87,000 K-12 students with 63,000 of those students in poverty.
- The 2015 goals are evidenced by:
    - The state's average student and school achievement growth measures will increase by 5% each year.
    - The state's National Association for Education Progress (NAEP) scaled scores will improve by a minimum of 9 points across all subgroups.
    - The state's racial and income (low income-high income) achievement gaps will close by half on the NAEP.
    - The state's 4-year high school graduation rate will increase to 84% from 76% (as of 2009).
    - The percentage of graduating high school seniors who enroll immediately in two- and four-year colleges will increase from 58% (2007) to 77.5%.

- The percentage of students who complete more than a year's worth of college credit within two years of enrolling in an institution of higher education will increase 10% per year.
- By 2020 at least 35% of high school students will attain ACT college-readiness benchmarks in all four college content areas assessed on the college entrance exam and the state's six-year college graduation rate will increase to 56%. The state has a 46.5% six-year college graduation rate while the national average rate was 55.9%.

Due to the current status data being unavailable in the response, the achievement gain for Elementary and Secondary Education Act (ESEA) and NAEP assessments and the decreasing in those areas by subgroups is not clear. Although the response does not provide what the achievement goals would look like were the state to not receive a RTTT award, the state indicates that the speed at which the state would reach the goals would be lessened. The response reflects achievement goals in narrative only without tables and graphs with the supporting narrative.

Therefore the evaluation for the criterion is in medium range. The extent to which the participating LEAs plans will translate into broad statewide impact is incomplete due of the lack of current status data and the lack of a description of what the goals would look like were the state to not receive an award under this program.

(A)(2) Building strong statewide capacity to implement, scale up, and sustain proposed plans	**30**	**23**
(i) Ensuring the capacity to implement	20	15
(ii) Using broad stakeholder support	10	8

(A)(2) Reviewer Comments: (Tier 1)

(i) The state's response to ensuring it has the capacity required to implement its proposed plans is evidenced by:

- The recent legislation and support from state leaders that include the governor, state board of education, state superintendent of instruction, higher education chancellor and two candidates for state school superintendent support the capacity to implement. The State Board of Education (SBOE) will secure an annual third-party evaluation to refine and publicly report on supports needed for success.
- The RTTT planning process began in December 2009 (Appendix 2-D) and was supported by a steering committee of 17 leaders that included, but was not limited to, higher education, unions, business leaders, teachers, school association members, 60 subject-matter experts and a national consultant to receive and provide input.
- The State Department of Education (SDE) will have a RTTT cross functional team that will report to the State Superintendent. The team will be lead by the RTTT Director with authority over RTTT areas that include, but are not limited to, the Charter School and Teacher / Leader Effectiveness directors.
- The SBOE has a track record in educational reform and administering large-scale grant projects as evidenced by the Education Reform Act of 1990 and the Achieving Classroom Excellence Act (ACE) of 2005.
- The state has a RTTT Commission created within Senate Bill 2033 that will act as a dedicated team to monitor and report on key progress areas regardless of whether the state is a recipient of the grant. Key areas include recommendations on the development and implementation of teacher and leader evaluations and the review of the correlation between quantitative and qualitative scores to ensure validity of implementation.
- The state's lawmakers have supported LEAs in the passing of Senate Bill 222. The RTTT Director's staff will provide LEAs updates that include the state's reform agenda related to Common Core Standards, student assessments, and implementation of the Teacher Leader Evaluation (TLE) system. Although the state indicates a technical assistance conference upon awarding of the proposed grant that will include best practices and support for execution of their scope of work, the

narrative lacks specificity on identification of current promising practices LEAs will use, those that prove to be ineffective and will cease to be used, and an initial plan and support for scaling best practices through participating LEAs. The response indicates the RTTT Program Monitor will be responsible for LEA progress and compliance but the response lacks specificity on the process and LEA support in place towards success.

- The SDE leadership team works with the RTTT Director to ensure monitoring of funds, adequate reporting and public access to use of funds, and as a part of Oklahoma Commission of Teacher Preparation (OCTP), ensuring that teacher and principal evaluation results align with policy and funding related to preparation programs. The narrative lacks specificity on grant administration and oversight, budget reporting and monitoring, performance measure tracking and fund disbursement.
- The evidence provided in the Budget Summary Narrative for (A)(2)(i)(d) reflects a budget framework to accomplish the state's plans with project (correlated to RTTT areas of reform), description, and funding amounts. The state indicates the use of all appropriate funding sources available towards the goals of the RTTT grant that includes federal (School Improvement Grant (SIG), Title I, Title IIA and Title IIB) and state (ACE Remediation, Mathematics Improvement Program, Advanced Placement Incentive Program) funds.
- Exemplified by Senate Bill 2033, and other for mentioned legislation, the State has demonstrated a political will in support of specific RTTT reform areas beyond the grant period. Within Selection Criteria (A)(2)(i) the state indicated that current federal and state funds will support the state's reform plan. The state's response lacks clarity on the RTTT fiscal and human resources that will continue for those reform areas that demonstrate success after the grant period has ended.

Therefore the evaluation for the criteria is in the high range. The lack of specificity and clarity that includes grant administration, fiscal and human resources after the grant period ends, identification of current promising practices LEAs will use, and LEA compliance reflects negatively on the capacity to implement the proposed plans.

(ii) The state's response to support from a broad group of stakeholders is evidenced by:

- The MOU demonstrates signatures from 26% of local teacher unions of participating LEAs and letters of support from superintendents of Oklahoma and Tulsa Public Schools, Oklahoma Education Association and the Oklahoma City American Federation of Teachers (AFT). The response does not reflect support from a state school board association.
- The strength of the AFT letter is reflected within the following quote "The Oklahoma City AFT, Local 2309 of the American Federal of Teachers, supports Oklahoma's Race to the Top application and is eager to help devise and implement needed reform."
- Other critical stakeholder support includes, but is not limited to, letters from Chris Benge, Speaker of the House; House Democratic Leaders Danny Morgan and Charlie Lester; Pleas A. Thompson, President of the NAACP Tulsa Branch; Cooperative Council for Oklahoma School Administration (CCOSA) Executive Director, Steven Crawford; OSSBA Executive Director; University of Oklahoma President, David L. Boren; The University of Tulsa President, Steadman Upham; Knowledge is Power Program (KIPP) representative Kendra Bramlett; and Grove Parent Teacher Organization. The strength of their commitment is reflected within the following quote from the parent teacher organization, "Oklahoma's Race to the Top is about much more than securing Oklahoma's share of grant funds. It is about transforming our schools and communities to give every child in our sate the best education possible. We see this as a transformative opportunity to dramatically improve Oklahoma's student achievement and graduation rates among all students in our public schools that will shape the future of our economy and quality of life."

Therefore the evaluation for the criteria is in the high range. The lack of response from 74% of local teacher unions, who are considered critical stakeholders, limits the ability to build a strong statewide capacity to implement and sustain the proposed plans.

(A)(3) Demonstrating significant progress in raising achievement and closing gaps	**30**	**17**

(i) Making progress in each reform area	5	5
(ii) Improving student outcomes	25	12

(A)(3) Reviewer Comments: (Tier 1)

(i)The state's progress in educational reform and use of federal/and state funding is evidenced by the following:

- The raising state assessment cut scores (2009) to mirror NAEP proficiency markers. The ACE Act (1990) provides framework and funding for more rigorous standards, curriculum and assessments supported by work with the American Diploma Project (ADP). The provision of standards-based Pre-K (2005) reflects that the teacher must hold a bachelor's degree and early childhood certification. The provision that each LEA must provide full day kindergarten. The state has made progress in standards, assessments and accountability, moving from 13thto 9thin the nation (2010 Quality Counts). "Oklahoma's Promise" supports students of low-poverty with a maximum family income of $50,000 (2003).
- The implementation of the Wave (2005-2006) to further educational accountability and manage valid and timely student information such as enrollment, graduation and dropout mobility. The existence of P-20 Data Council (2009) supporting a unified data system while Senate Bill 222 requires communication of data to stakeholders. The provision of Ways to Improve School Effectiveness (WISE) (2010) as a "GPS" for school reform along with the Quality Time Analysis Tool supporting time reform efforts and subsequent policies to positively impact instruction and student growth.
- The collaboration between the Gates Foundation (2009) and Tulsa Public Schools to accelerate the roll out of a teacher effectiveness system that will inform the state's Teacher Leader Effectiveness Evaluation System (TLE) to track and measure student growth. The recognition of high quality teachers as evidenced by the legislature support of National Board Certified Teacher (NBCT). The support for alternative certification is evidenced by alternative certification for principals (2007) and for teachers (Teach for America 2009/American Board for Certification of Teacher Excellence (2009).
- Using SIG funding, all persistently low-achieving schools are required to support reform strategies by the use of WISE (2010).
- Senate Bill 2033 and Senate Bill 509 provide flexibility to the two largest LEAs to remove ineffective teachers.
- ARRA funding has been used in support of the P-20 Longitudinal Data System (LDS), school improvement, preservation of teaching and leadership positions, and research-based professional development and adolescent literacy.

(ii) The extent to which the state has improved student outcomes since 2003 and explained connections between data and the actions is evidenced by:

The state has participated in actions to raise cut scores on ESEA assessments (that mirror NAEP proficiency markers) and re-calibrated and raised benchmarks for ACE Algebra I and English II exit exams. The federally approved Academic Performance Index(API) demonstrates progress for the selected years. Within the narrative, the state provides Oklahoma Core Curriculum Test assessment for one year and ESEA results from 2005-2008. Appendix 3-d provides API for 2005-2009. The state's evidence does not reflect NAEP and ESEA results since 2003 because on the state assessments were being field tested. The narrative does not provide an analysis of the data and tables or graphs overall and by sub-group. There has been a decrease in achievement gaps between sub-groups on both NAEP and ESEA assessments and an increase in passing statewide exams that includes greater improvements in some areas as compared to the nation. The graduation rate for all students has hovered at approximately 75% for the seven year period, which includes a 3 point decrease (between 2006 and 2008) and a return to 76% (2009). The state's response does not include graduation rate by sub-group and an explanation between of the connections between the high school graduation rate data and related actions.

Although the response indicates that overall the improvements are reflective of increased state's standards, increased intervention by the SDE in struggling schools, and professional development to targeted teachers

and principals to decrease the achievement gap, it lacks specificity into specific programs and/or strategies that have contributed to the improvements shown.

Therefore the evaluation for the criteria is in the middle range. The extent to which the state has demonstrated its ability to improve student outcomes and explain the connections is limited due to the lack of specificity of the actions that have contributed to the improvement and lack of analysis of the data required since 2003.

Total	**125**	**95**

B. Standards and Assessments

	Available	Tier 1
(B)(1) Developing and adopting common standards	**40**	**40**
(i) Participating in consortium developing high-quality standards	20	20
(ii) Adopting standards	20	20

(B)(1) Reviewer Comments: (Tier 1)

The state's strength in their commitment to adopting a common set of high-quality standards is evidenced by:

(i) The state has actively participated in the Common Core State Standards (CCSS) initiative that includes three state representatives invited to write and provide feedback (Achieve Letter January 15, 2010). The states' MOU (A1-m) reflects the state will adopt a common core of state standards that are internationally benchmarked and streamlined standards aligned with college and career readiness. Within the narrative, the state indicates it has actively participated in the CCSS initiative consortium that includes a majority (48) States.

(ii) The response indicates that the state expects to receive delivery of the CCSS by June 2, 2010 and will begin to conduct public hearings in preparation for adoption of the standards at the regularly scheduled Oklahoma State Board of Education (OSBE) meeting. Senate Bill 2033 reflects the state's commitment to adopting the CCSS by emergency rule making if needed (B1-A) and the subsequent plan to hire an independent organization to complete a crosswalk analysis between Priority Academic Student Skills (PASS) and CCSS.

Therefore the evaluation of the criterion is in the high range because the progress towards adoption by August 2, 2010.

(B)(2) Developing and implementing common, high-quality assessments	**10**	**10**
(i) Participating in consortium developing high-quality assessments	5	5
(ii) Including a significant number of States	5	5

(B)(2) Reviewer Comments: (Tier 1)

(i) The extent of the state's plan for developing and implementing high-quality assessments is evidenced by the MOU, in which the Key Elements of Oklahoma's Reform Agenda (A1-m) communicate the state's commitment to developing and implementing aligned and vertically integrated assessment systems that will support student learning and accountability. The state's SBOE will set new cut scores on the new assessments in accordance with the directives of the assessment consortium developing the common assessment.

(ii) The participation in The Partnership for Assessment of Readiness for College and Careers (PARCC) consortium (B2-B) includes a majority (27) of States in the country.

(B)(3) Supporting the transition to enhanced standards and high-quality assessments	**20**	**17**

(B)(3) Reviewer Comments: (Tier 1)

The extent to which the state is supporting the transition to enhanced standards and quality assessments is evidenced by:

- The state's three related goals support a. ensuring the CCSS are understood and implemented P-16, b. providing effective professional development to implement CCSS, and c. development and provision of resources for LEAs to monitor successful implementation of CCSS.
- Supporting activities for a statewide transition include a. the state joined the America Diploma Project's 2009 Action Plan to support the transition to more rigorous standards, curriculum support, assessment fidelity and high school/college accountability, b. the conduction of a crosswalk analysis of PASS and CCSS, and c. a collaboration to align CCSS standards and assessments from Pre-K through college and career, and d. the use web-based and print based related tools.
- Supporting activities for the provision of effective professional development include:

1.
    - The PARCC consortium assessment bank professional development.
    - The use of the Windows On Curriculum (WOC) training to support use of CCSS and new assessments.
    - The state plans to use their instructional toolkit, PASSport, to support both transition and implementation to internationally benchmarked K-12 standards. ACE and ADP will work together with the adoption of CCSS that includes the development of ADP academies to train teachers, counselors and administrators. Involvement from the OSRHE and CareerTech will ensure LEA input.
    - Assessment activities that will monitor the successful implementation includes the development of an online tool for preparing, administering, and analyzing CCSS aligned formative and interim student assessments. Also, the state's current work with the PRCC consortium will provide an assessment item bank and related professional development. Proposed RTTT funding will be used to train teachers about the effective use of formative and interim assessments to impact classroom instruction.
    - A technology-based solution is scheduled to articulate horizontal and vertical connections between objectives and skills, monitor student mastery, and connect to LEA instructional improvement systems. In the same vein, proposed RTTT funding will support a curriculum alignment study to examine student work to monitor fidelity of the concepts and rigor in CCSS.

Therefore the evaluation of the criteria is in the high range as the extent of the response provides plans that include transition and implementing internationally benchmarked K-12 standards, alignment of high school exit criteria to college entrance, delivering high quality professional development, and implementing formative and interim assessments.

Total	**70**	**67**

C. Data Systems to Support Instruction

	Available	Tier 1

(C)(1) Fully implementing a statewide longitudinal data system	24	16

(C)(1) Reviewer Comments: (Tier 1)

The application reflects that the state's State Longitudinal Data System (SLDS) currently meets 8 of the elements of the America Competes Act.

The elements of the America COMPETES Act not included are the student-level transcript information, including information on test courses completed and grades earned; the information regarding the extent to which students transition successfully from secondary school to postsecondary education, including whether students enroll in remedial coursework; the capacity to communicate with higher education data systems; and other information determined necessary to address alignment and adequatepreparation for success in postsecondary education.

(C)(2) Accessing and using State data	5	3

(C)(2) Reviewer Comments: (Tier 1)

The state's plan for accessing and using State data is evidenced by:

- The state's plan indicates three strategies for accessing and using the data include a. ensuring the data is accessible and useful to key stakeholders, b. use of WAVE (the state's K-12 data system) and P-20 SLDS to enhance the school improvement processes and data to inform decision making regarding policy, instruction, operations, management and resource allocation, and c. publish and communicate the availability of information and solicit feedback in support of widespread use.
- Examples of accessibility and usefulness of data is evidenced by providing "access portals" that are targeted to three specific stakeholder groups designed to analyze data based specific user group needs. Researchers and the public will have access that includes aggregated student achievement, LEA progress report grades, the states report card and demographic snapshots. The P-20 Data Council will provide oversight that includes merging of educational data within the P-20 SLDS repository and creation of rules governing access to and use of data. The state understands that different stakeholders approach the data system from their own perspectives. In that vein the plan includes efforts to provide customized visualizations of the data. Through the SDE, CareerTech and Institutions of Higher Education (IHE) will jointly solicit stakeholder feedback on the use of the P-20 SLDS to ensure its use.
- The state indicates that the application of the data to support continuous improvement efforts includes areas such as policy and operations, and will be evidenced in the enhancement of WISE with WAVE and the P-20 SLDS.

Although the response provides detailed information about WISE (Appendix C2-A) as a Global Positioning System (GPS) for school reform, it lacks specificity in how the proposed enhancement will improve continuous improvement efforts such as specific analyses of operations, management, and resource allocation.

The plan lacks specificity in the extent to how it will monitor progress such as the projected numbers of stakeholders that will participate in presentations and webinars to provide feedback.

Therefore the evaluation of the criteria is in the middle range as the plan lacks specificity that includes how the WISE/WAVE proposed enhancement will support decision makers in the continuous improvement efforts and how the state will monitor the progress of access to the statewide longitudinal data system.

(C)(3) Using data to improve instruction	18	12
(i) Increasing the use of instructional improvement systems	6	4
(ii) Supporting LEAs, schools, and teachers in using instructional improvement systems	6	4

(iii) Making the data from instructional improvement systems available to researchers	6	4

(C)(3) Reviewer Comments: (Tier 1)

(i) The state's plan for using data to improve instruction involves three strategies. The increase of acquisition, adoption and use of the local instructional improvement system (IIS) is evidenced by:

- The state will increase acquisition of instructional improvement systems by providing an Instructional Improvement System (IIS) for each participating LEA that does not have one.
- The IIS will include high-quality instructional improvement tools and professional learning resources, and formative, and interim assessments.
- In support of providing information that will inform instructional practices, the plan includes paying for K-8 assessments while LEAs pay for high school assessments. For participating LEAs that have an IIS, the state will require that the existing IIS will ensure conformance and will repurpose the LEAs portion of the IIS as needed which supports increase of the use of the local IIS.
- It is unclear how the state is defining "in" as compared to "accessible" that is reflected in the following timeline statement: "The IIS's will be in every school in participating LEAs by Fall 2012 and accessible by every teacher and principal in those LEAs by Fall of 2013."
- It is unclear from the states' response, if the proposed IIS will meet the definition of an instructional improvement system in the area of using information to inform decisions on appropriate next instructional steps and evaluating the effectiveness of the actions taken.

Therefore the evaluation for the criterion is in the high range. The extent to which the state provides a lack of clarity about the timeline for accessing the IIS by teachers and principals and if the proposed IIS meets the full definition limits the state's high quality plan for acquisition, adoption and use of local IIS.

(ii) The plan for supporting the use of instructional improvement systems with effective professional development is evidenced by:

- Participating LEAs related professional development needs are supported with six dedicated data coaches. The data coaches will be supported by additional Curriculum and Assessment Team trainers and district level employees to provide professional development to teachers, leaders and administrators on how to use the system, understanding the data in support of student needs and informing instruction, and use of the data in professional learning teams to support continuous instructional improvement.
- The use of data to inform instruction will be integrated into teacher/principal preparation and certification programs. It is noted that first priority will be given to low-performing schools. It is unclear how data coaches' professional development will be evaluated to determine effectiveness or need for adjustment of professional development strategies. The plan indicates that trainers will be deployed based on the numbers of teachers and their interest. In determining where trainers will be deployed, the plan does not recognize the recognize the needs of persistently lowest-performing schools and/or specific subject matter areas. The plan does not reflect the projected number of teachers that will be trained yearly.

Therefore, the evaluation for the criteria is in the high range, with the acknowledgement of the lack of clarity that includes how the effectiveness of professional development will be determined, the extent to which professional development will be provided teachers and principals of high-need students, and the plan for the numbers of teachers, principals and administrators that will be trained over the grant period.

(iii) The state will make the data from IIS, the WAVE and the P-20 SLDS available to researchers to determine the degree of effectiveness of instructional practices as evidenced by:

- The plan includes research topics that support the evaluation of the effectiveness of instructional materials and strategies. Examples include:
    - The investigation into efficacy of instructional materials and strategies in conjunction with the transition to CCSS.

- The interventions strategies started by the persistently lowest-achieving schools.
- The effectiveness of early childhood initiatives.

- The response lacks clarity about plans for the provision of data supporting approaches for educating different types of students whose achievement is below or above grade level.
- The timeline lacks specificity about when researchers will have access to the data systems together with the statewide longitudinal data system data.

Therefore the evaluation for the criteria is in the high range. The extent to how the plan will use data to improve instruction is limited due to the lack of clarity on data supporting different of students and lack of specificity of when researchers will have access to the instructional improvement system together with the statewide longitudinal data system data.

Total	**47**	**31**

D. Great Teachers and Leaders

	Available	Tier 1
(D)(1) Providing high-quality pathways for aspiring teachers and principals	**21**	**13**
(i) Allowing alternative routes to certification	7	4
(ii) Using alternative routes to certification	7	5
(iii) Preparing teachers and principals to fill areas of shortage	7	4

(D)(1) Reviewer Comments: (Tier 1)

(i) The extent to which the state has made progress in providing high-quality pathways for teachers and principals is evidenced by:

- Legal provisions for teachers include a. Law: 70 O.S. 6-122.3 for Alternative Placement Teaching License, b. Law: SB 582 for ABCTE, and c. Law 70 O.S. 6-195 for TFA.
- Currently one alternative route exists for principals and is associated with an IHE. The response indicates principals may complete alternative certification in conjunction with an IHE.
- The alternative routes include a minimum of four of the five elements of the alternative route definition for teachers.
- The response reflects an alternative route for principals that provides an options to test out of a course.

The evaluation of the criterion in the middle range. The provision of high-quality pathways for aspiring principals is limited because the current alternative route does not permit providers that operate independently of IHEs.

(ii) The state has expanded the routes for alternative certification in the last two years. A list of alternative certification programs includes teachers in Alternative Placement Teaching License, ABCTE and TFA. ABCTE and TFA have been in operation since fall 2009. Successful completions from ABCTE and TFA are not provided since those paths began fall 2009. Currently the options for Alternative Placement Teaching and ABCTE do not apply to early childhood education, elementary education or special education.

The alternative route for principals is through participating in an administrative program through an IHE. The ability for principal candidates at the university to test out or limit coursework supports alternative pathways to certification.

Teacher and principal alternative certification programs meet the elements of the definition (as defined in this notice). The number of teacher certificates for the previous year was 12,128 of which 35% were completed in an alternative certification program. The number of principal certificates for the previous year was 1,847 of which 4% were granted in an alternative certification program. A five year comparison of

newly certified educators and a subset of principals indicate that the number of newly certified teachers from an alternative route has increased.

(iii) The state has a process for monitoring, evaluating and identifying areas of teacher and principal shortage that begins with the LEA requirement to submit to SDE the teacher and principal shortage information or face loss of funding (House Bill 2211). The state's response provides the four areas of consideration in the report that includes teaching positions that are filled by teachers who have not averaged at least an "effective" rating for the last two years per the TLE that is based largely on student growth. The state also surveys school districts to determine shortage areas. The plan to encourage and provide professional development to prepare teachers to fill areas of shortage includes:

- The collaboration between SDE and Commission for Teacher Preparation to monitor and identify areas of shortage and determine hard-to-staff content areas and schools.
- The provisions of incentive pay to recruit and retain teachers in critical subject areas.
- The provision of professional development for mathematics and science (through SDE and University of Oklahoma).
- The collaboration between the STEM Coordinating Council, which includes the Colleges of Education and the Commission for Teacher Preparation, to analyze human capital needs and prepare plans to both identify and prevent future shortages.
- The recent accreditation by the Commission for Teacher Preparation allows the University of Oklahoma's College of Engineering STEM education program to target professionals with STEM related degrees into an alternative certification pathway (financial incentive via SB 2033).
- The five IHEs working to prepare educators in the unique demands of teachers in urban areas supporting Oklahoma City and Tulsa Public Schools.
- The state allows for emergency certification to fill shortage areas for teachers.
- Cooperative Council for Oklahoma School Administration (CCOSA) collaborates with SDE to provide training for new principals.

Therefore the evaluation of the criterion is in the middle range. Outside the identified work of CCOSA with SDE, the extent of the plan is lacking in processes to prepare principals to fill areas of shortage.

(D)(2) Improving teacher and principal effectiveness based on performance	**58**	**55**
(i) Measuring student growth	5	5
(ii) Developing evaluation systems	15	15
(iii) Conducting annual evaluations	10	10
(iv) Using evaluations to inform key decisions	28	25

(D)(2) Reviewer Comments: (Tier 1)

(i) The state's response to establishing clear approaches to measuring student growth is evidenced by:

- Oklahoma's Teacher and Principal Effectiveness Act of 2010 (Senate Bill 2033) that reflects 50% of teacher and principal TLE quantitative measures must be based on 35% student academic growth and 15% student academic growth according to other measures of academic progress. The bill provides stipulations for grades or subjects for which there is not a state mandated test.
- The state milestones reflect that by December 2011 there will be a uniform statewide system for measuring teacher and leader effectiveness of which student growth in included.
- The state educator evaluation system defines student growth in the TLE as an individual student's growth in achievement over a defined period of time.

Therefore the evaluation of the criterion is in the high range based on the extent to which the response provides a clear approach to measuring student growth for each student.

(ii) The state's response to designing and implementing rigorous, transparent, and fair evaluation systems is evidenced by:

- In support of fairness, The Race to the Top Commission will oversee a process for determining how to measure student growth for TLE in each grade and class PK-12 and design recommendations for the SBOE to adopt by December 2011.
- Senate Bill 2033 requires transparency in the development of TLE system. The RTTT Commission will solicit participation from a broad group of stakeholders that includes three representatives from the largest teacher associations, a representative of a statewide organization representing public school superintendents and a representative of a statewide organization representing business and education.
- TLE is a multiple rating system that differentiates on effectiveness into six categories.
- Staff to assess the qualitative component of the TLE will be certified administrative personnel. The assessment will be based on qualitative factors designated specifically for teachers and leaders with five and six factors respectively.
- TLE scores will be monitored for validity using state-mandated correlation checks of quantitative and qualitative scores.

- Participating LEAs have the option to implement for the 2012-2013, with all LEAs implementing TLE on an annual basis by 2013-1014.

Therefore the evaluation of the criterion is in the high range. Multiple rating systems for evaluation and the inclusion of principals and teachers in the design and development supports the state's plan to improving teacher and principal effectiveness. The states commitment to evaluation systems is also demonstrated in its ambitious timeline for both participating LEAs and all LEAs to put qualifying evaluation sysem in place.

(iii) Senate Bill 2033 requires annual evaluations of teachers and principals, regardless if they are a participating LEA or not, and that teachers and principals receive constructive feedback that includes student growth for their students, classes, and schools. Refusal to comply with TLE evaluation provisions and training constitutes grounds for withholding State-Aid funds until the LEA complies. Using their IIS, teachers and principals will have access to feedback and data that includes observations, student growth data, formative and summative assessment data and instructional improvement tools.

Therefore, the evaluation of the criterion is in the high range as the response clearly articulates the plan for conducting annual evaluations of principals and teachers.

(iv) The state's response articulates an ambitious plan of how evaluations will be used to inform decisions. The plan is evidenced by:

- Based on Senate Bill 1485, LEAs professional development committee must use a data-driven approach to analyzing student data and determine district and school professional development needs. Using TLE and data linked to student growth, professional development should become more strategic. Within the RTTT plan participating LEAs must document how evaluation data will be used to inform professional development. They will have access to evaluation feedback tied to professional learning activities based on their strengths and weaknesses. Based on proposed RTTT funding, participating LEAs must implement instructional coaching, or other job-embedded professional development that aligns with teacher and principal evaluations. Using SLDS and SDE's certification system, collaboration between the Commission for Teacher Preparation and the SDE will further prioritize professional development and link it with effectiveness ratings to measure efficacy of professional development providers over time. The state will annually publish effective professional development providers while policy makers will be able to access the data to better allocate state and federal dollars.
- Senate Bill 2033 entitles teacher performance pay. Beginning in the 2012-13 school year, participating and non-participating LEAs have the flexibility to design and implement specific district-funded incentive pay systems that are contingent upon a teacher or principal achieving superior or highly-effective rating under the TLE system with grade level, subject area, or school level performance success. The state plans to use proposed RTTT funds to create a competitive grant program open to all participating LEAs to fund incentive pay initiatives based on Senate Bill 2033 that includes hard-to-staff subjects and critical areas. Funded applications must link financial incentives to the top one or two tiers of the evaluation system results. The state's response is unclear as to how effective teachers and principals will be promoted or given additional responsibilities.
- Due to Senate Bill 2033, career status and non-renewal will be dependent on a teacher's effectiveness rating within TLE. Principals do not receive career status. Current law indicates that principals ranked ineffective for two consecutive years will not be reemployed without a successful petition from the superintendent. Under the bill, the primary basis for when an LEA is required to implement reduction-in-force, retention, or reassignment must be based on TLE. Senate Bill 2033 reflects that teachers who appeal a decision to be terminated are not entitled to unlimited pay and benefits until resolution of the appeal. The state's changes in career status law are independent of RTTT funding. The state's approach to granting teachers' career status (noting principals cannot receive such status) and removing ineffective tenured and untenured staff is supported by law. The state's performance measures reflect two years to put student growth and the evaluation system processes in place.

The timeline ambitiously reflects 100% of teachers and principals will be developed, compensated, retained, granted tenure or removed based on the evaluation system by 2014 (50% by 2013).

The evidence and ambitious performance measures place the response to the criterion in the high range.

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(D)(3) Ensuring equitable distribution of effective teachers and principals	**25**	**22**
(i) Ensuring equitable distribution in high-poverty or high-minority schools	15	13
(ii) Ensuring equitable distribution in hard-to-staff subjects and specialty areas	10	9

(D)(3) Reviewer Comments: (Tier 1)

(i) The state has four strategies involving the use of data analysis and accountability towards ensuring equitable distribution, development of a staffing model, increasing the percentage of effective teachers in high-need schools and in hard-to-staff subject areas, and use of statewide initiatives. Supporting activities of the plan are evidenced by:

- As a part of its proposed RTTT plans each LEA will submit Equitable Teacher and Principal Distribution plans on the number and distribution of effective teachers and principals and establish a baseline of distribution based on the five tier TLE rating system with annual goals for increasing equity. Participating LEAs must equalize the distribution of effective teachers with the potential loss of funding for noncompliance based on state law.
- In support of high-need schools having effective teachers at the same rates as schools that are not high-need, the SDE will contract with a vendor for the model staffing initiative. It will provide guidance to principals and train LEAs on processes for hiring and retaining effective principals and teachers in high-need schools and hard-to-staff subjects.
- As part of the proposed RTTT plan, the state will offer competitive grants for incentive pay and allocate a minimum of 50% to target qualifying teachers and principals that are in high-need schools.
- Senate Bill 2033 provides support for students in high-poverty and/or high-minority schools that are not served by ineffective teachers and principals at higher rates by providing the option for alternative governance. The LEA can choose to not retain any teacher at any school site identified for school improvement for four consecutive years.

- As TLE data feeds the IIS and SLDS, the Commission for Preparation will work with teacher/principal preparation programs to improve the rate of producing effective teachers and principals and monitor alternative certification pathways.
- The state's baseline goals reflect at the end of the grant period that the percentage of highly-effective teachers in schools that are high-poverty, high-minority, or both will be the same as the percentage of highly-effective teachers in schools that are low-poverty, low-minority, or both. The trend is the same for principals.
- The response lacks clarity on how it will be determined if the teachers and principals are "highly" effective (both as defined in this notice).

The evaluation of the criteria is in the high range. The extent to which the plan ensures that high-poverty and/or high-minority schools will have equitable access to highly effective teachers and principals is unclear. The response does not reflect if students achieve at high rates (e.g., one and one-half grade levels in an academic year) for teachers and principals.

(ii) The increase of the number and percentage of effective teachers in hard-to-staff subjects and specialty areas is evidenced by:

- Participating LEAs Equitable Teacher and Principal Distribution Plan must establish baseline data by subject area with plans for equalizing the subject area distribution.
- Senate Bill 2033 gives LEAs authority to provide greater compensation to teachers of hard-to-staff subjects that include STEM, special education, and language instruction.
- Using its SLDS, the state plans to further monitor and maintain high quality of effective teachers in hard-to-staff areas.
- The analysis of the Workforce and Economic Development and STEM Coordinating Council will result in strategies to increase the number of women and minorities entering hard-to-staff STEM teaching areas.
- Within the performance measures, the baseline goals reflect at the end of the grant period the percentage of math, science, special education and language teachers that were evaluated as effective or better is the same as the percentage of highly effective that are low-poverty, low-minority, or both.
- The plan is unclear as to whether the teachers of hard-to-staff subjects are effective based on the definition of effective teachers within the notice.

Therefore the evaluation of the criterion is in the high range that includes an ambitious performance measures for teachers in hard-to-staff areas. The extent of the plan to increase access to effective teachers in hard-to-staff areas is limited because of the lack of clarity about whether the teachers will meet the definition of effective (as defined in the notice).

(D)(4) Improving the effectiveness of teacher and principal preparation programs	**14**	**13**
(i) Linking student data to credentialing programs and reporting publicly	7	7
(ii) Expanding effective programs	7	6

(D)(4) Reviewer Comments: (Tier 1)

(i) The state's three strategies to improve the effectiveness of teacher and principal preparation programs includes a. linking student data and educator effectiveness to teacher preparation and certification programs, b. publishing evaluation their evaluation data and, c. expanding preparation options that have proven to be successful in producing effective teachers and principals.

The plan's activities supporting the strategies are evidenced by:

- Senate Bill 2033 provides for annual evaluations of teachers and principals based largely on quantitative measures of student growth and student achievement.
- The WAVE currently has the ability to link student achievement data to students' teachers/principals and the programs where they received credentialing and certification pathway. Implementation of TLE in all LEAs will capture student growth data. Disaggregated student growth data by preparation-program level will be publicly reported.
- As a condition of accreditation and their continued authority to recommend candidates for certification, each preparation program must analyze and respond annually to their particular scores reflecting their alumni's effectiveness, links to student achievement and growth, describing areas of weakness, and their plan for making improvements.
- Teacher preparation programs will link teacher and principal data with the department that prepared them for their content knowledge. Public preparation and credentialing program reports will show the impact of the programs graduates on student growth, as compared to all other teacher or principal (as appropriate) preparation programs in the state, the rate at which each program's graduates earn full career status, and the numbers of graduates working in Oklahoma schools that is disaggregated by LEA and high-need schools.

Therefore the evaluation of the criterion is in the high range. The response clearly articulates that student achievement and student growth data will be linked to teachers and principals and the credentialing program. Further articulation reflects the data for the credentialing programs will be publicly reported.

(ii) The state plans to first identify and expand successful preparation and credentialing programs beginning with the data reports regarding teacher and principal programs tied to student growth and achievement (2011-2012) and then provide follow up reports with regard to TLE measures of effectiveness (2012-2013). After the second and third year of the proposed grant, the public will know which programs are most effective and positively impact student learning. LEAs will be better informed where to recruit teachers and principals. Stakeholders, to include policymakers, will be aware of the programs that merit expanding and which need adjustments. The performance measures are ambitious with 100% of teacher and principal preparation programs, and the public, will have access to achievement/growth data by 2012. The state also plans to continue alternative certification options such as Teach for America. The response lacks clarity as to how credentialing "options" are to be increased.

Therefore the evaluation of the criterion is in the high range. The plan articulates the monitoring and expansion of successful preparation programs with ambitious performance measures. The lack of clarity on the expansion of credentialing options limits the extent of the plan to improve on the effectiveness of teachers and principals.

(D)(5) Providing effective support to teachers and principals	**20**	**20**

(i) Providing effective support	10	10
(ii) Continuously improving the effectiveness of the support	10	10

(D)(5) Reviewer Comments: (Tier 1)

(i) The state's response to providing effective support for teachers and principals is evidenced by:

1. LEAs will adopt a comprehensive professional development model that includes job-embedded planning and collaboration time that provides time and resources for teachers to review student data and collaborate on planning and instructional strategies. The K20Alt Program provides an example of opportunities for virtual collaboration between Oklahoma teachers.
   SDE will be responsible for a. certifying all professional development (by analyzing student and participant outcomes), b. ensuring that professional development models submitted by districts are coherent and based upon latest research and data on teacher and leader effectiveness, and c. certifying and calendaring professional development activities and offerings to avoid duplication and maximize professional development resources.

- The Commission for Teacher preparation will oversee independent evaluation of professional development.
- Windows on Curriculum (WOC) provides opportunities for collaboration between teachers and principals that includes analyzing data about assessment.
- The Oklahoma Commission on Teacher Preparation will collaborate with the Cooperative Council for School Administration (CCSA) to modify the New Principals' Assistance Program and the Principals' Leadership Academy to include curriculum addressing issues for high-needs schools. Professional development will include data systems and use of data to inform instruction.
- LEA plans for professional development must be data-driven and backed by information gained through student assessments. The state has identified RTTT professional development priorities that align with the federal reform areas and will provide a list of pre-approved comprehensive professional development plans based on national "best-practice" research. Proposed professional development includes Effective Use of Assessments and Effective Use of Data Systems.
- The STEM Coordinating Council will review national and regional STEM educator training resources and programs for effectiveness and make professional development recommendations to the State Department of Education regarding STEM-specific professional development. STEM-related content will be required of every Participating LEA's professional development model. The University of Oklahoma's K20 Center's Science Professional Development Institutes will make STEM related learning opportunities available to the Participating LEAs.
- The state has a goal of 100% of novice principals and principals of high-need schools will complete intensive leadership training in 2011-2012 and every year thereafter. Recruiting and Retaining Human Capital in High-Need Schools and Hard-to-Staff Subjects is a course for principals within the state's professional development priorities for principals.
- The response clearly indicates professional development priorities for both teachers and principals.

Therefore the evaluation of the criterion is in the high range as the response clearly articulates a plan for professional development that is strong in analyzing and using data to support data informed decisions. The timeline reflects an ambitious goal for leadership training for 100% of principals in high-need schools.

(ii) The state's response to measure, evaluate and continuously improve the effectiveness of the support is evidenced by:

- The creation of a certification system for professional development offerings to both certify and measure progress. LEAs RTTT funded professional development must be certified by the SDE. The Department will ensure that professional development offerings demonstrate an impact on participant and student outcomes.
- Through WAVE/SLDS, an online clearing house of certified professional development offerings will be made available to LEAs as they develop their professional development plans.

- The Oklahoma Commission for Teacher Preparation will oversee and develop an independent evaluation of RTTT professional development.
- The Professional Development Clearinghouse will assess the outcomes of professional development offerings that include how it impacts student growth and/or TLE scores.
- The professional development evaluation results will be published annually. In cases where the professional development provider does not demonstrate high impact results, they will be given one year to improve. Only program/providers with high impact results will retain certification. The certification of offerings is scheduled for 2011.

The response provides clear articulation that reflects measuring the effectiveness of professional development that demonstrates an impact on student achievement. Results will be published annually and the timeline reflects that certifying, improve or remove will begin by 2011. Only professional development with a high impact will keep certification. Therefore, the evaluation of the criterion is in the high range.

Total	138	123

E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	**10**	**10**

(E)(1) Reviewer Comments: (Tier 1)

The state's response indicates that the state has legal and statutory authority to intervene in the persistently lowest-achieving schools and LEAs that are in improvement or corrective action status. This is evidenced by:

- Senate Bill 268 (2009), grants the state the authority to require the alternative governance of any school identified as in need of improvement for four consecutive years (Appendix E1-A).
- NCLB, Public Law 107-110 reflects that the state has the authority and necessary regulatory processes to intervene in LEAs pursuant to its accreditation authorities (Appendix E1-B).

(E)(2) Turning around the lowest-achieving schools	**40**	**40**
(i) Identifying the persistently lowest-achieving schools	5	5
(ii) Turning around the persistently lowest-achieving schools	35	35

(E)(2) Reviewer Comments: (Tier 1)

(i) The state's response to its ability to identify the persistently lowest-achieving schools is evidenced by:

- The state's definition of the "persistently lowest-achieving schools" was approved by U.S. Department of Education on April 20, 2010 (Appendix E2-A).
- The state has identified 20 persistently lowest-achieving schools and those non-Title 1 eligible schools, that would be considered persistently lowest-achieving schools were they eligible to receive Title I funds.

The evidence reflects that the response successfully meets the criterion as the state has identified the persistently lowest-achieving schools (as defined in the notice) and non-Title I eligible secondary schools and therefore is evaluated in the high range.

(ii) The states' response to supporting LEAs in turning around persistently lowest-achieving schools is evidenced by:

- SB 2033 (the Oklahoma Teachers and Leader Effectiveness Act of 2010) provides support to LEAs in multiple ways that include a Teachers and Leader Evaluation System that can result in a fast expanding pool of effective teachers and leaders and provide metrics on every teacher and principal. It provides authority for LEAs to use their funding to support incentive pay for effective teachers in persistently lowest-achieving schools. Lastly, the bill results in persistently lowest-achieving schools will make reductions in force based primarily on Teacher and Leader Evaluation System ratings.

- Senate Bill 509 gives the state's two largest LEAs the authority to implement alternative governance for any school on the need of improvement list for four years, upon approval from the district board and in concurrence of the executive committee of the local bargaining unit. This will positively impact the timeframe in which LEAs can remove ineffective teachers.
- The creation of a "School Turnaround Unit" focuses on current schools and those likely to become persistently lowest-achieving schools. The unit will assist LEAs in selecting their intervention model, review LEAs work production and counsel them to be more aggressive when their plans are not sufficiently comprehensive to be successful. They will also support LEAs by drawing on experienced and effective teachers, identify successful professional development for turnaround teachers in low-performing school, and provide support to schools in developing expanded learning time schedules. The state acknowledges that strong parent and community engagement is critical to the success of struggling schools. To that end, the School Turnaround Unit will provide related support that includes identification, review, support and assistance with the funding of community school initiatives in persistently lowest-achieving schools.
- Persistently lowest-achieving schools may use proposed RTTT funds in the creation of intervention clusters of which the SDE will provide regulatory waivers in all areas of school operations except finance, certification, health and safety. Required intervention and empowerment plans must be grounded in research or successful practices and approved by the local board of education and the State Board of Education. This initiative draws on elements from the Mass Insight school turnaround model.
- Persistently lowest-achieving schools will have prioritized access to the web-based reform planning tool WISE. The schools will complete a needs assessment and use WISE to design tailored action plans. WISE is provided at no cost to all persistently lowest-achieving schools.
- The state will monitor and hold LEAs accountable which is evidenced by each lowest-achieving school committing to making AYP by spring 2013. Examples of monitoring support from the Turnaround Unit includes frequently monitoring progress, setting intermediate goals and visiting each persistently lowest-achieving school on a designated basis.
- If improvement plans are not followed, the state will use one or more of the following sanctions:
  - Reduction or removal of any SIG grants received under Section 1003(g) of the ESEA
  - Reduction or removal of Turnaround School funds through RTTT
  - Removal of regulatory waiver and empowerment zone/school/district status
- The evidence reflects the need for principals with a vision and the authority to hire staff.
- The performance measures reflect an adequate but less of an ambitious plan for each of the persistently lowest-achieving schools to exit the intervention model.

Therefore, the evaluation of the criterion is in the high range as the response articulates multiple supports to LEAs in implementing the school intervention model that include supporting state legislation, waivers/flexibility for intervention clusters, use of WISE to complete needs assessments and a provision for monitoring/compliance with improvement plans.

Total	**50**	**50**

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	**10**	**6**
(i) Allocating a consistent percentage of State revenue to education	5	3
(ii) Equitably funding high-poverty schools	5	3

(F)(1) Reviewer Comments: (Tier 1)

(i) The state's narrative indicates there was a greater amount of total revenues to support elementary, secondary, and higher education in FY 2009 as compared to FY 2008, while the percentage of total state

appropriation remained unchanged. The difference in funding from FY 2008 to FY 2009 was an increase of .04 billion dollars.

Medium points are awarded as the percentage of state revenues available to the state that were used to support elementary, secondary and public higher education remained unchanged from FY 2008 to FY 2009.

(ii) The state's response to policies that lead to equitable funding is evidenced by:

- The State-Aid formula takes into account various factors that include, but are not limited to, the local ad valorem revenue a local school district receives and other statutory specific conditions that are used to reflect the varying costs of providing education services, depending upon the size and location of a particular school district.
- The State-Aid formula reflects the Foundation Aid that includes Average Daily Membership (ADM) for Pupil Category Weights of which students that are economically disadvantaged (ADM .25) are included.

The evaluation of the criterion is in the middle range which includes that the response is inconclusive about the State's policies that lead to equitable funding within LEAs, between high-poverty schools and other schools.

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	**40**	**29**
(i) Enabling high-performing charter schools "(caps)"	8	6
(ii) Authorizing and holding charters accountable for outcomes	8	7
(iii) Equitably funding charter schools	8	7
(iv) Providing charter schools with equitable access to facilities	8	4
(v) Enabling LEAs to operate other innovative, autonomous public schools	8	5

(F)(2) Reviewer Comments: (Tier 1)

(i) The state's status on charter school law is evidenced by:

- Senate Bill 1862 and House Bill 2753 that promote the expansion of high quality charter schools (Appendix A1-G and A1-H) (Appendix F2-C).
- Senate Bill 1862 and House Bill 2753 reflect that the state no longer has an annual cap on the number of new charter schools that may be authorized.
- Senate Bill 1862 allows for the authorization of charter schools in any LEA that has a school on the state's School Improvement list or any LEA with 5,000 or more students and in a county with at least 500,000 residents.
- Allow charter schools to serve students in any school designated as "in need of improvement" and remove the annual cap on the creation of new charter schools in Tulsa and Oklahoma counties, which contain the state's two largest school districts (Tulsa P.S. and Oklahoma City P.S.).
- Enable flexible policy options to support the creation of high quality charter schools and other non-charter innovation models to improve student learning.
- The narrative reflects the state currently has two KIPP schools and the Western Village. Within the (F)(2)(ii) narrative, the state indicates there are 20 charters that operate in urban, high-need communities of the largest LEAs in the state.

Therefore, the evaluation of the criterion is in the high range evidenced by no cap in the number of charter schools but there is a lack of clarity on the percentage of charter schools and the specific types of charter schools currently operating in the state.

(ii) The state's response to its laws, statutes, regulations, or guidelines regarding how charter school authorizers approve, monitor, hold accountable, reauthorize, and close charter schools is evidenced by:

- Oklahoma Charter Schools Act requires prospective charter schools to detail the following their mission, organizational structure and governance, hiring policies, plans to measure instructional effectiveness, a three-year financial management plan, their support from area residents, and documentation that they have successfully completed their charter school start-up training.
- State law requires that charter schools report drop-out, graduation rate, along with accountability data that is comparable to other public sites.
- Senate Bill 1862 reflects that charter schools give enrollment preference to students in an LEA where the charter is located and who attend a school site listed on the school improvement list. It also indicates that American Indian tribes may sponsor charter schools throughout the state for the purpose of demonstrating native language immersion instruction and it is located within its former reservation or treaty area boundaries. The State Board of Education may sponsor a charter school operated by Oklahoma's Office of Juvenile Affairs.
- OKLA. STAT. tit. 70, § 1210.544 reflects that charter school governance arrangement is one of the five turnaround options available to the LEA for a school which has been identified for school improvement for four consecutive years
- Charter schools are accountable in that their contracts and must include criteria to measure effectiveness as related to rigorous student performance standards. If the charter fails to meet the student performance standards outlined in the contract, the sponsor may give 90 days written notice to terminate the contract. This is subject to due process.
- None of the six charter schools that have been approved in the last five years have been closed.

Therefore the evaluation of the criterion is in the high range. Examples that reflect the extent of the state's plan include state statue OCSA, charter effectiveness related to rigorous student performance standards, and that students in a school on the improvement list may attend a charter within the LEA with similar student population. The is a lack of evidence for the reason(s) for denying the nine charter applications limits the understanding of how the state is authorizing charter schools.

(iii) The state's response to charter schools receiving equitable funding is evidenced by:

- Per student funding that charter schools receive within the State-Aid formula is the same as traditional schools and set by law. Due the current funding formula rules, charter schools' per-pupil funding can exceed the per-pupil funding of non-charter schools because charter schools' state aid formula is not subject to the "chargeables" of which tradition schools are subject. Charter schools are specifically allowed to receive money from any other source, including grants and donations.
- Charter Schools Incentive Fund (OKLA. STAT. tit. 70, § 3-144) provides them up to $50,000 in start-up costs and training (Appendix F2-C).
- Senate Bill 1862 entitles charter schools to receive other appropriated revenue in addition to State-Aid allocation.

Therefore the evaluation of the criterion is in the high range. The evidence reflects equitable funding that is equal to or greater than 90% of that which is provided to public school students and additional option for charter funding, each fostering equitable funding conditions. The lack of clarity about whether charter schools receive equitable funding from Federal revenues limits the understanding of whether charter school students receive related commensurate funds.

(iv) The state's response reflects that state law does not impose facility-related requirements on charter schools that are stricter than those applied to traditional schools and allows charters greater facility flexibility. The narrative also reflects that the charter per student funding is the same as traditional per student and that the State-Aid formula would be at a minimum the same as traditional schools. The narrative lacks clarity about whether it provides charter schools funding for facilities and about the equity of state funding around capital outlay that may impact leasing facilities, purchasing facilities and charter's ability to share in bonds or local levies.

Therefore the evaluation of the criterion is in the middle range. The lack of clarity about the provision of funding, that includes ability to share in bonds and mill levies, for facilities limits the state's plan ensuring successful conditions for charters.

(v) The state's response to enabling LEAs to operate innovative, autonomous public schools other than charter schools is evidenced by:

- The state allows for innovative public schools under state's deregulation and statutory waiver procedures. These processes allow for schools to modify the length of the school day, student promotion graduation policies, budgeting and staffing.
- Examples of innovative schools include elementary language (Spanish, French, and Chinese), the Street School alternative education program and the all-digital Crescent High School. At Crescent High, the state allowed the use of textbook allocation funds for professional development and support for teachers developing online content.

Therefore, the evaluation of the criterion is in the middle range as the state enables innovative schools and has statutory provisions. There is a lack of clarity about the degree of increased accountability (as defined in notice for autonomous public schools) for student achievement which brings into question whether the result of enabling LEAs to operate innovate schools actually results in student academic success.

(F)(3) Demonstrating other significant reform conditions	**5**	**4**

(F)(3) Reviewer Comments: (Tier 1)

The state's response to demonstrating other significant reform conditions is evidenced by:

- The state is a national leader in universal Pre-K programs (NIEER 2009). The report estimates that, when Head Start is included, 84% of the state's four-year-old children receive Pre-K (Appendix A3-A). Georgetown University studies reflect that the state's Pre-K helps to close the achievement gaps and increase reading readiness. Pre-K Hispanic students who spoke Spanish at home realized monthly-equivalent gains.
- To improve early childhood services, the 2003 state law created the Oklahoma Partnership for School Readiness. The state, district, and the private sector leveraged 45 MM for the early childhood education services fund.
- 2005 legislation requires each LEA to provide full day kindergarten, with 94% of the state's Kindergarten students enrolled.
- 2006 legislation created a pilot program to employ bachelor-degreed teachers to provide education for children from birth through three years of age that meet the federal poverty guidelines for free and reduced lunch.
- In 2007, the State Superintendent convened the Time Reform Task Force calling attention to the state having the nation's shortest school year. Based on the Task Force recommendations, the State Board of Education adopted four new policies.
- The response lacks specificity in how reform significant conditions have resulted in increased student achievement or graduation rates and narrowed achievement gaps.

Therefore evaluation of the criterion is in the high range and acknowledges the progress in the areas of Pre -K and Kindergarten

Total	55	39

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1
Competitive Preference Priority 2: Emphasis on STEM	**15**	**15**

Competitive Reviewer Comments: (Tier 1)

The states' plan to address an emphasis on STEM is evidenced by:

- Examples within the state's plan that emphasize STEM include:
  - The use of alternative certification pathways in hard-to-staff schools and content areas such as STEM is supported through the University of Oklahoma's College of Engineering.
  - Senate Bill 2033 provides LEAs flexibility in incentive pay to recruit or retain teachers in critical subject areas such as STEM within specific allocations of RTTT high-need schools.
  - There is a provision of the New Teacher Project to guide principals in high need schools and hard-to-staff subject areas such as STEM.
  - The use of TLE effectiveness data to assess the number and percentage of effective teachers in hard-to-staff subjects such as STEM.

- The focus of STEM related professional development for teachers needing improved content and pedagogy assistance. The K20Alt Program serves as a resource for this type of STEM related professional development.
- The state is aware of its core economic engines are centered on STEM and has abundant STEM assets; but, the state recognizes it must strengthen its focus (Appendix P2-b).
- The creation of STEM Coordinating Council whose goal is ensuring that every student in Oklahoma receives a quality STEM education and will be college and career ready in STEM areas of concentration. Council representatives represent industry experts, universities, educators, and research centers. Towards meeting the goal, the council will inventory the state's STEM assets by June 2011 allowing for the alignment between industry needs, educational offerings and use of workforce projections developed by the Governor's Council on Workforce and Economic Development. Those actions will provide the data necessary to take action to close the gap between the STEM entry-level workforce readiness needs and the available workforce to include attracting underrepresented groups of women and minorities.
- Through the state's STEM Asset Map Process (Appendix P2-a) and the state's SLDS, there will be the provision of opportunities for both STEM and education leaders to identify STEM needs, address weaknesses, and increase the number of STEM courses and teachers.
- The Oklahoma School of Science and Mathematics (OSSM) is recognized for its rigorous two-year public high school curriculum that has a rural outreach program.
- The CareerTech expansion of STEM related Project Lead the Way will provide support to middle school students.
- The state's Project Exploration focuses on serving female and minority students which includes a multi-year relationship and opportunities for applied learning.

Therefore, the response has met the competitive priority that reflected throughout the application and within the summary. The plan provides for a rigorous course of study in STEM areas; cooperation between industry, research centers, and universities; and preparing more students for advanced study and careers in STEM areas that includes the preparation of underrepresented groups and of women and girls in STEM areas. The STEM MAP will allow for a needs assessment to target the number of STEM courses and teachers that are needed.

Total	**15**	**15**

Absolute Priority - Comprehensive Approach to Education Reform

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		**Yes**

Absolute Reviewer Comments: (Tier 1)

The state has provided a well articulated and cohesive plan in each of the four education reform areas that includes strong legislative support, identified vision, goals, strategies, activities and timelines/milestones that reflect a comprehensive understanding of the proposed Race to the Top work.

Legislation such as the Oklahoma Teacher and Principal Effectiveness Act will have substantial influence in the proposed Teacher and Leader Effectiveness System to make progress in the state's persistently lowest -achieving school. Senate Bill 1485 provides for direction on how professional development funds will be funded to utilize data-driven approaches while Senate Bill 1862, Oklahoma's Charter Schools Act, removes the caps on new charter schools.

The state's plan demonstrates sufficient LEA participation and commitment to successfully implement and achieve the goals in the plan. The state has support from the two largest LEAs representing approximately 87,000 K-12 students and approximately 63,000 K-12 students in poverty. One hundred percent of the LEAs responded Yes to using the Standard Terms and Conditions. Approximately 47% of LEAs responded Yes to participating in each of the applicable Plan Criterion with 53% of LEAs responding Conditional to

three of the eleven Section D criterions. Two-hundred and seventy-eight superintendents provided MOU signatures. The state received many letters of support from a broad group of stakeholder that include key stakeholders such as the NAACP, two state education agencies, the two future superintendent candidates, state school agencies, higher education and state legislators.

The full picture of Oklahoma's Race To the Top reform agenda to transform its schools reflects ten areas that specifically describe success in each correlated to the four reform areas. Each of their proposed six goals aligns with the four areas of reform. The state communicates its current status of reform and an aggressive yet achievable plan by 2012.

The state, in collaboration its participating LEAs, propose to use the RTTT funds to increase student achievement. Examples include the state's average student and school achievement growth measures will increase by 5% each year, NAEP scaled scores will improve by a minimum of 9 points across all subgroups and the state's NAEP racial and income achievement gaps will close by half on NAEP, the state's 4-year high school graduation rate will increase to 84% from 76% (as of 2009), and the percentage of graduating high school seniors who enroll immediately in two- and four-year colleges will increase from 58% in 2007 to 77.5%.

The state's proposed plan is in the spirit of the four areas of reform and a comprehensive approach to reform.

Total		**0**

Grand Total	**500**	**420**

Race to the Top

Technical Review Form - Tier 1

Oklahoma Application #3850OK-4

A. State Success Factors

	Available	Tier 1
(A)(1) Articulating State's education reform agenda and LEA's participation in it	**65**	**34**
(i) Articulating comprehensive, coherent reform agenda	5	4
(ii) Securing LEA commitment	45	22
(iii) Translating LEA participation into statewide impact	15	8

(A)(1) Reviewer Comments: (Tier 1)

i) The application responds directly to the requirements of the ARRA:

1) The application sets clear goals for adopting standards that meet the ARRA requirements by August 2.

2) Through enactment of SB 2211, the state has made important progress toward implementing The Wave, a new system for longitudinal data. The application spells out goals for implementation.

3) The Teacher and Leader Effectiveness (TLE) system is designed to support improving instruction and leadership across the state. Improvement in teaching and learning will depend on turning a state program into challenging and meaningful discussions that lead to individual insights and changes. SB2033 increases the chances that such discussions will take place, and that they will be useful. The plan does not directly address the challenge to address equity in the *distribution* of effective teachers and leaders, but it creates the possibility that districts might use pay incentives to tip the balance in favor of working in schools where teacher and leader talent is needed most intensively.

4) The state's application describes an intervention strategy to turn around the lowest-performing schools, supported by a planning tool called WISE.

(ii) The MOU that Oklahoma's LEAs have been invited to join is substantially identical to the model MOU (see PDF page 396).

The summary of support (PDF page 414) and accompanying letters suggest that gathering support for this MOU has been challenging. In a few cases, the application includes persuasive, plainly-worded evidence of support, such as the letter from the president of the Oklahoma City AFT, the largest local in the state. The evidence of support from Putnam was similarly persuasive. There did not appear to be evidence of similar support from Tulsa, Edmond Public Schools, or other large districts. (For example, the letter of support from Tulsa's school board president was "approved and signed... in complete reliance on your representations and assurances to our legal counsel that the District can opt out of the MOU at any time up to 90 days after the State is awarded Race to the Top funding." PDF page 511.) Overall, Oklahoma obtained support commitments from just 49% of school boards and 26% of teachers' unions. The state-level support for this work in the leadership of the teachers' unions does not yet appear to have spread through the organization, and this is an impediment to the Race to the Top mandate to achieve widespread impact. Many of the key requirements meant to be enforced through the MOU remain subject to collective bargaining in 148 districts.

Because Okahoma's population is concentrated in two big LEAs, the commitment level of those areas is critical to success of the state's Race to the Top effort. It has plainly been difficult to secure full support on a widespread basis. The letter from OEA president Becky Felts (page 26) is important evidence of support from the top, but the table summarizing local signatures to the terms of the MOU leaves plenty of room for doubt about whether the support from the state leadership level translates to local engagement.

(iii) The state presents clear goals for advancing achievement (e.g. NAEP scores up an average of 9 points by 2015), decreasing gaps (e.g. decrease by half by 2015), improving graduation rates (from 76% to 84% in 2015), and increasing college enrollment rates (from 58% to 77.5%). These goals are ambitious but the state presents them as achievable. If accomplished, these goals would represent important statewide impact.

The state's plan seems to present sufficient ambition, sufficient buy-in, and sufficient central authority to translate to broad state impact. However, the terms of the MOU seem to leave significant potential for this authority to be undercut by collective bargaining at the LEA level.

(A)(2) Building strong statewide capacity to implement, scale up, and sustain proposed plans	**30**	**23**
(i) Ensuring the capacity to implement	20	16
(ii) Using broad stakeholder support	10	7

(A)(2) Reviewer Comments: (Tier 1)

(i) The application describes a state team of considerable experience. The support of both candidates for state superintendent of public instruction is useful evidence of unity of purpose. The Governor's support is also important evidence given the Governor's role in appointing the state board of education. The plan for a Race to the Top commission, supported by annual third party evaluation, seems likely to ensure stable and meaningful support at the state leadership level. The state implementation team also appears credible.

The implementation plan includes a substantial list of new or reconstituted boards, committees, groups, directors, initiatives and conferences. The application did not articulate who will do what, who will lead – and, importantly, who will *not* work on each specific initiative. The position of Race to the Top Director will be key to execution of the plans that the application describes. The budget (pdf page 274) appears lean, but sufficient to support the Director and staff.

Many of the critical elements of Oklahoma's plan involve creating systems, standards, frameworks, and the like that can continue beyond the period of the grant. It seems plausible that the state and LEAs can continue many of them when the RTT funding cliff arrives.

ii) As noted above, the application shows indeterminate support from teacher organizations. Support from administrators appears stronger but not universal.

The application shows important evidence of long-term donor support including the George Kaiser Family Foundation and the Charles and Lynn Schusterman Family Foundation. Donors have been crucial in bringing resources to projects such as the New Teacher Project and Teach for America. Supportive letters from important state leaders are also included in the application.

(A)(3) Demonstrating significant progress in raising achievement and closing gaps	**30**	**23**
(i) Making progress in each reform area	5	4
(ii) Improving student outcomes	25	19

(A)(3) Reviewer Comments: (Tier 1)

Oklahoma has demonstrated an ability to make progress in each of the four education Reform Areas:

1. It has moved decisively toward adopting internationally-benchmarked, results-oriented standards and assessments. The change in cut-scores was particularly indicative of an emphasis on meaningful success. (page 68) Work with the American Diploma Project seems to have been influential in the thinking behind Oklahoma's RTT plans.
2. Oklahoma has built data systems (including The Wave) to measure student success and inform teachers and principals as they work to improve their practice. The state's RTT plan represents the next steps in this effort.
3. Oklahoma attributes some of its recent results to investments that it has made to improve teacher effectiveness. There is less direct evidence that the state has effectively addressed inequities in the distribution of effective teachers. The Academic Achievement Awards described on page 76, for example, appear to reward teachers for absolute results that may be importantly driven by demographic and socioeconomic factors. If these programs are not currently aligned with the growth model, as it appears, the application would have been strengthened by a plan to make them so. Some of the policies included in the MOU, if implemented significantly, may drive increased clarity about which teachers are having the greatest impact. The absence of performance benchmarks in this area raises doubt aboutf whether this will occur.
4. Oklahoma's recent successes in turning around the lowest-achieving schools provide some hope for progress in a challenge that few states can claim much success addressing. The application points out that the recent change in cut-scores means the state will soon have many more schools requiring mandatory interventions. The application expresses confidence that the state has a formula that works for turning them around. These schools will be supported by state-assigned School Support Teams (SSTs). The application expresses confidence in the effectiveness of these teams when they are given the policy freedoms associated with "Empowerment Zones": "SSTs are proven and up to the task: In 2008-09 alone, 4 of 18 schools assisted by SSTs with on-site support improved test scores sufficiently to be removed from the school improvement list; 13 of 18 made AYP in reading; and 15 of 18 made AYP in math according to their 2008-09 test score reports."

Oklahoma began its testing programs later than most states and could not comply with the RTT requirement to present evidence of student growth with data beginning in 2003. Furthermore, it recently recalibrated its proficiency cut scores in order to more rigorously apply state standards. This change created a false appearance of a decrease in proficiency; in fact, the state has been modestly advancing student achievement, as presented in the graphs beginning on page 84.

The state attributes the reduction in achievement gaps and improvements in achievement primarily to "increased intervention by Oklahoma State Department of Education in struggling schools. Professional development has been targeted to teachers and principals to eliminate the achievement gap—especially in the State's lowest achieving schools." The state acknowledges that improvements in achievement and reductions in gaps have not been accompanied by a significant improvement in graduation rates, which have remained fairly steady at about 76%.

Total	125	80

B. Standards and Assessments

	Available	Tier 1
(B)(1) Developing and adopting common standards	**40**	**40**
(i) Participating in consortium developing high-quality standards	20	20
(ii) Adopting standards	20	20

(B)(1) Reviewer Comments: (Tier 1)

(i) Oklahoma's application makes it plain that the state will become part of a consortium that satisfies the criteria for standards. The application states that the consortium currently includes 48 states, two territories, and the District of Columbia. Modification of Oklahoma's current state standards, PASS, to align with the Common Core will be accomplished by a "crosswalk" exercise directed by the Oklahoma State Department of Education. (PDF page 106)

(ii) The application includes assurances that the standards will be adopted by August 1, 2010, using a special emergency rule to work around the fact that the legislature will not be in session.

(B)(2) Developing and implementing common, high-quality assessments	**10**	**10**
(i) Participating in consortium developing high-quality assessments	5	5
(ii) Including a significant number of States	5	5

(B)(2) Reviewer Comments: (Tier 1)

Oklahoma's application includes assurances that new assessments will be implemented swiftly. To ensure high quality and alignment with a significant number of states (27), the state will rely heavily on a strong external dependency on a contract (with Achieve) to implement much of the work. The new standards will be rolled out in the form of changes from the status quo "PASS" standards rather than as a rollout from scratch, which should speed implementation.

(B)(3) Supporting the transition to enhanced standards and high-quality assessments	**20**	**14**

(B)(3) Reviewer Comments: (Tier 1)

The state's application includes a sketch of how it will implement new standards through several approaches. For example, it indicates a plan to update the PASSport system in order to facilitate implementation of the standards through updated lesson plans, assessments and materials. This work will take time, and implementation is forecast for 2011-12 (PDF page 108). Dissemination of instructional material aligned with the Common Core will rely heavily on web resources that do not yet appear to exist. It appears that the main human face of the rollout of the Common Core at the district- and school level (once the PASS crosswalk is complete through a contract with Achieve) will be a corps of 92 master teachers receiving small stipends to conduct training in regional conferences (PDF 110) that will reach 500 teachers per year. The application presents targets for usage of assessments that suggest the state expects adoption to be gradual and uneven, remaining well below 100% through the conclusion of the grant.

Total	70	64

C. Data Systems to Support Instruction

	Available	Tier 1
(C)(1) Fully implementing a statewide longitudinal data system	**24**	**16**

(C)(1) Reviewer Comments: (Tier 1)

Elements 4, 9, 11 and 12 are not completely in place per the criteria. (pp 114-116)

(C)(2) Accessing and using State data	**5**	**3**

(C)(2) Reviewer Comments: (Tier 1)

Oklahoma's current data systems do not align or interoperate very well. The application describes an investment to bring longitudinal data into a structure that ought to be more useful for supporting effective teaching and learning. The goals of this plan are clear, including aggressive draft milestones for

accomplishment of these goals. The plan is less persuasive in terms of providing evidence that the state knows how to accomplish this work in the timeframe it has defined. For example, the application describes the need to integrate three separate interfaces to student and teacher data (pages 120-123). The considerable work of defining and implementing these interfaces is expected to occur within two years from what appears to be a standing start.

(C)(3) Using data to improve instruction	**18**	**11**
(i) Increasing the use of instructional improvement systems	6	4
(ii) Supporting LEAs, schools, and teachers in using instructional improvement systems	6	4
(iii) Making the data from instructional improvement systems available to researchers	6	3

(C)(3) Reviewer Comments: (Tier 1)

Oklahoma's application emphasizes the case study of Western Heights (page 133, and Appendix), where an instructional improvement system has helped produce strong improvements in learning results. The application presents a plan to roll out similar systems in Oklahoma The plan for how to accomplish this seems to alternate between defining/aligning state-driven, state-selected systems (the Wave, Windows on Curriculum, WISE) and relying on local development (as in Western Heights). The application tips toward state-driven solutions, as evidenced by the inclusion of materials from Wireless Generation's guide for instructional improvement systems (PDF page 834). The timeline to implement these Instructional Improvement Systems is reasonable, but only if key decisions (e.g. Which system? What timeline? What are the implementation milestones?) are made quickly and clearly. The framework for making such decisions does not appear to be defined in the application.

Once these starting-line decisions are settled, the resources described to support participating LEAs seem minimally sufficient. The state team (six centrally-coordinated regional data coaches [pg 291] supporting 15 locally supporting 400 at implementation level) seems light to have a widespread human-level impact. The application mentions a tactic to help LEAs support themselves and one another through coaching: "Several Participating LEAs have also expressed an interest in using their Race to the Top funds to pay for weekly or bi-weekly data coaching time (in 90-minute blocks) for small teams of teachers in low-performing schools led by a local data coach who is trained by a regional data coach."

The state's plan refers to an intent to make data available to researchers, but it was not clear from the budget where the funding for such research will come from.

Total	47	30

D. Great Teachers and Leaders

	Available	Tier 1
(D)(1) Providing high-quality pathways for aspiring teachers and principals	**21**	**11**
(i) Allowing alternative routes to certification	7	3
(ii) Using alternative routes to certification	7	4
(iii) Preparing teachers and principals to fill areas of shortage	7	4

(D)(1) Reviewer Comments: (Tier 1)

Oklahoma allows several alternative paths to teacher certification, including ABCTE and Teach For America. These routes are selective, supervised, school based and independent of institutions of higher

education, satisfying the Race to the Top criteria. An alternative certification option for principals (page 144) exists, but it appears to differ minimally from the standard path: the application states that principal candidates must complete a program at an institution of higher education (IHE) in order to receive a full certificate.

The volume of alternatively-certificated teachers in Oklahoma appears to be significant. The application states that nearly a third of Oklahoma teachers are alternatively-certified. The same cannot be said of principals -- more than 95% join the profession through traditional routes, and the alternative route still involves an institution of higher education.

Oklahoma has not had a particularly strong process for identifying and (especially) acting on shortages, but this seems poised to change. Passage of HB 2211 will ensure that the state collects data needed to identify shortages in a way that includes evaluation of whether the teachers in place are effective. SB 2033 clears the way for LEAs to act strongly to address shortages and gaps in their instructional staff, including incentive pay structures. The application does not appear to address these gaps with regard to principals.

(D)(2) Improving teacher and principal effectiveness based on performance	**58**	**43**
(i) Measuring student growth	5	5
(ii) Developing evaluation systems	15	9
(iii) Conducting annual evaluations	10	9
(iv) Using evaluations to inform key decisions	28	20

(D)(2) Reviewer Comments: (Tier 1)

(i) Oklahoma's application explains how the state will measure student learning growth for purposes of its programs directed at improving teacher and leader effectiveness. (Page 157) Passage of SB2033 sets the stage for a Teacher and Leader Effectiveness (TLE) Evaluation System that is aligned with RTT guidelines. The application (Page 160) sets broad, guidelines for how to implement evaluation for principals and for teachers in non-tested subjects.

(ii) The application explains that teachers will be evaluated using multiple rating categories. It states that 35% of a teacher's effectiveness rating will be based on tested growth, 15% other measured learning growth. (The remaining 50%, presumably, is qualitative; the application does not appear to provide specific guidance regarding the rubrics and evaluation process to guide judgments in this area.) The plan includes evaluation milestones that will help to identify whether scores are internally consistent. The application states that the RTT Commission will oversee a deliberative process to determine "how to measure student growth in the TLE for each grade and class PK-12" The application sets a deadline of December 2011 for the State Board to adopt the TLE system.

The work of the Race to the Top Commission will be of critical importance in determining whether the TLE rating scale is rigorous. As described, it seems prone to an important weakness in its design: grade inflation. There do not appear to be defined guidelines regarding the proportion of teachers that may, or should, receive a given rating, including the top and bottom of the five-rank scale described. On its own, the existence of a rating system provides little assurance that the system will be taken seriously to differentiate teacher performance.

(iii) The passage of SB 2033 provides authority to address the stated goals regarding useful annual reviews of teachers and principals. The existence of the TLE system will make it easier for the discussions surrounding those reviews to include measurements of student learning. This will in many cases be a new frame of conversation for teachers and principals; the application sketches a training plan in very rough terms, but the content of this training remains to be developed.

(iv)

(a) The MOU requires that participating LEAs must implement coaching and other professional development in a way that aligns with evaluations. If done in a quality way, this should advance the state's goal to foster focus on results and effective practice. The plan to annually evaluate and report on outcomes produced by external PD providers also seems a promising use of the state's new data systems. Responsibility for coordination of all this evaluation activity seems loosely to fall into the hands of the Commission for Teacher Preparation; the description on page 167 includes a long list of those meant to cooperate in this work, highlighting the risk that leadership may be unclear.

(b) The state appears to have cleared away formal barriers to local LEA use of pay incentives to support reform efforts and strategies for improving practice. Based on the application, it seems that the pilot incentive pay program underway in Tulsa (page 169) is expected to serve as the model for incentive pay innovation in Oklahoma. The state has committed $15 million of its RTT budget proposal to a competitive grant program that it describes as being for incentive pay. On closer reading these proposed incentives are mostly not effectiveness-related – about half are incentives directed at influencing what and where teachers teach – and there appears to be no requirement that incentives be directed to individually effective teachers or school leaders.

(c) SB 2033 establishes that evidence of effectiveness, based on data in the TLE system data, must inform key career status changes for teachers and principals. The five-tier rating system, if used in a way that involves all five tiers, appears poised to become very important in Oklahoma. The application suggests that all of the rating tiers will be used in a roughly normal distribution, but does not appear to provide any explanation for what will enforce the curve, or at what level (for example grade, school, or LEA) the curve is expected to apply.

(d) The application forecasts 100% participation by LEAs by 2014 in use of data to remove ineffective tenured teachers, but the MOU signature summary page suggests that many individuals remain unconvinced about this commitment.

(D)(3) Ensuring equitable distribution of effective teachers and principals	**25**	**15**
(i) Ensuring equitable distribution in high-poverty or high-minority schools	15	9
(ii) Ensuring equitable distribution in hard-to-staff subjects and specialty areas	10	6

(D)(3) Reviewer Comments: (Tier 1)

The application is candid about the scale of the equity problem it faces in distribution of teacher talent and teacher experience in the state of Oklahoma. The anecdote on page 178 (every non-qualified teacher in Tulsa worked in a high-needs school) provides a neat and useful summary of the challenge.

The application does not appear to have many immediate plans to directly and centrally address this difficult challenge (an exception is the planned expansion of the Teach For America corps). Rather, it describes a set of actions to lay groundwork in a gradual fashion to create conditions for success. For example, it appears that the state expects to collect effectiveness data about teachers by 2013-14. At this point the state will have reached the starting line: most of the actions it proposes to increase effective teaching and decrease ineffective teaching in high-needs schools appear to depend on completing this system. Only with the system in place can the proposed mechanisms have any effect. Even then, producing results will require local decisions to rate teachers differentially. This does not appear to be a widely accepted strategy.

On page 187, the application suggests that participating LEAs will face fiscal and other sanctions from the state if they fail to reduce disparities in distribution of effective teachers by 2014-15, the year after the systems to collect data to detect disparities are to be implemented. It seems unlikely that things will come to pass in quite this way, and the interval between being able to label schools where the disparity exists and being able to do something about it seems likely to produce negative feelings more directly than it can produce career choice decisions at the individual level.

(D)(4) Improving the effectiveness of teacher and principal preparation programs	**14**	**9**
(i) Linking student data to credentialing programs and reporting publicly	7	7
(ii) Expanding effective programs	7	2

(D)(4) Reviewer Comments: (Tier 1)

The state's plan for linking growth fully meets the criteria. Building on the student data system ("The Wave") the Teacher and Leader Effectiveness Evaluation System (TLE) will link student achievement growth to teachers in a way that uses teacher ratings and student achievement data, and connects this data back to teacher preparation programs and institutions. The application states that these data will be made publicly available by the fall of 2013. The Oklahoma Commission for Teacher Preparation will include this information in its annual report on teacher and principal preparation programs, as well as on its website in a "report card" design. The application states that this review will be specific enough to identify evidence of effectiveness (or ineffectiveness) at the department level within IHEs or other programs.

The state's plan will identify effective programs, but does not set ambitious goals to expand them. It will take many years for market forces to apply themselves to elevate effective programs and diminish ineffective ones. Other than Teach for America, Oklahoma's plan seems not to make directive judgments in this area or setting specific, measurable goals.

(D)(5) Providing effective support to teachers and principals	**20**	**15**
(i) Providing effective support	10	7
(ii) Continuously improving the effectiveness of the support	10	8

(D)(5) Reviewer Comments: (Tier 1)

The state's plan for improving professional development programs hinges on tougher certifications of programs for effectiveness. Whether this produces results depends very heavily on the state's certification decisions, which the application promises will be data-driven. The application does not appear to set benchmarks regarding the process with which the state will evaluate programs, which will create a bureaucratic bottleneck. The application provides no assurances to mitigate this risk.

The state's strong posture toward quality and usage of data are likely to yield benefits in the area of professional development supports, if the bottleneck issues can be worked out.

Total	138	93

E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	**10**	**10**

(E)(1) Reviewer Comments: (Tier 1)

Oklahoma's application documents that the state has the authority to force actions in both persistently low-performing schools and persistently low-performing LEAs. (pg 218)

(E)(2) Turning around the lowest-achieving schools	**40**	**25**
(i) Identifying the persistently lowest-achieving schools	5	5
(ii) Turning around the persistently lowest-achieving schools	35	20

(E)(2) Reviewer Comments: (Tier 1)

(i) The state's list of lowest-achieving schools (for use in the application) was approved by the U.S. Department of Education on April 20, 2010. It is worth noting that the list of identified schools will likely grow longer, even with growth in student achievement, due to the state's decision to raise its cut scores.

(ii) The application emphasizes the creation of a new state-level "School Turnaround Unit" that will expand the scope of work of state "School Support Teams," which in turn will work with "Turnaround clusters" of schools. The School Support Teams (SSTs) will help LEAs choose their reform model (the application implies but does not clearly state that LEAs must select from among the four options required by the RTT program.) The application says that part of the Turnaround Unit's role will be "helping schools and LEAs with regulatory flexibility." This response does not appear to state clearly which of the four turnaround models will be used in each of the identified schools, nor does it create a clear process for making this difficult and important decision.

The state documents one positive example of making a school turnaround work, and two successes with restarts. The state has closed eight schools but did not provide evidence of the effect of these closures on the affected students and teachers. Oklahoma's plan depends on finding effective school leaders, and invests in a search firm to help find candidates. The amount of money that the RTT plan allocates to support turnaround efforts (about $250k per school) is significant. To the extent that schools fail to turn around, failure to invest seems unlikely to be the source of the problem.

Total	50	35

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	**10**	**6**
(i) Allocating a consistent percentage of State revenue to education	5	2
(ii) Equitably funding high-poverty schools	5	4

(F)(1) Reviewer Comments: (Tier 1)

Oklahoma's funding for education during the years evaluated for Race to the Top was unchanged in both absolute terms, and as a percentage of public expenditures.

Okahoma's policies for allocation of funding for education are, as in most states, the result of an accumulation of policy decisions made over time rather than being driven by high principles, consistently applied. Generally, the mix of policies in Oklahoma appears to accomplish distributional equity better than in many states, based on the EdWeek "quality counts" survey referenced on page 235 of the application.

Still, there appears to be room for improvement: The state's practice of giving extra money to districts where teachers already have high salaries, for example, directly reinforces existing patterns of wealth distribution.

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	**40**	**31**
(i) Enabling high-performing charter schools "(caps)"	8	8
(ii) Authorizing and holding charters accountable for outcomes	8	7
(iii) Equitably funding charter schools	8	7
(iv) Providing charter schools with equitable access to facilities	8	2

(v) Enabling LEAs to operate other innovative, autonomous public schools	8	7

(F)(2) Reviewer Comments: (Tier 1)

(i) Oklahoma's charter school law meets the criteria, and is free of "caps."

(ii) Oklahoma's existing charter schools are located only in Oklahoma City and Tulsa. The state has not yet closed a school for poor academic performance, perhaps because the situation has never yet arisen.

(iii) The state provides equitable state funding for students attending charter schools, as described on page 250 of the application. This seems to result in comparable funding for charter school students with the possible exception of Dove Academy (page PDF 948). The application does not make clear how or whether charter schools in Oklahoma participate in local funding.

(iv) Based on the application, it appears that access to facilities is a significant barrier to charter school formation in Oklahoma, with no significant start-up supports in terms of financial assistance or financing assistance.

(v) The application provides evidence of innovation in school design, including the digital approach adopted in Crescent. The innovative "time reform" efforts described on page 257 also seem relevant in the context of this question.

(F)(3) Demonstrating other significant reform conditions	**5**	**5**

(F)(3) Reviewer Comments: (Tier 1)

Oklahoma's pioneering work in providing education to 4-6 year olds is distinctive, and likely to pay educational dividends over time. The state seems to have made great progress in establishing universal access to preschool. It seems to be close to success in getting beyond the traditional tolerance of "half-day" kindergarten programs, though they seem still to be permitted. The state also describes thoughtful work in providing services to vulnerable children under the age of four. (PDF 595)

Total	55	42

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1
Competitive Preference Priority 2: Emphasis on STEM	**15**	**15**

Competitive Reviewer Comments: (Tier 1)

Oklahoma's application documents an assortment of good programs with promising potential, but with a paucity of linkages among them. The creation of the Wave and the STEM coordinating council may help to add coherency to the state's efforts.

The state has good STEM education elements: The Oklahoma School of Science and Mathematics (OSSM, page 260), for example, is an effective program that is growing in impact, with further expansion planned. Project exploration is an example of a working partnership with higher ed. Through the Weatherbug project, the University of Oklahoma is engaging students in meteorology. The Samuel Roberts Noble Research Foundation and Ardmore Public Schools is bringing biotech curriculum to students in a rural area.

The state's plan to improve data that can support these linkages should help to provide guideposts in the planning work of Oklahoma's new STEM coordinating council, beginning with the asset map that the application committed to complete by June 2010.

In order to build capacity in the state for STEM education, the application describes an expansion of programs for teacher preparation at the University of Oklahoma, page 152. The passage of SB2033 permits

districts to augment compensation for teachers of STEM subjects, which some districts may choose to do. The MOU for participating districts requires STEM related content in professional development (page 212).

Total	15	15

Absolute Priority - Comprehensive Approach to Education Reform

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		**Yes**

Absolute Reviewer Comments: (Tier 1)

Oklahoma meets the overall requirement to present a plan that adds up to a comprehensive and coherent education reform platform.

- Oklahoma has adopted internationally-benchmarked standards and assessments that prepare students for success in college and the workplace.
- Oklahoma is actively building data systems that measure student success and inform teachers and principals in how they can improve their practice.
- The state's investments will pay dividends in increasing teacher effectiveness.
- If Oklahoma were to fail the requirements for a "comprehensive approach," it would do so on the basis of the criterion of having a plan to achieve equity in teacher distribution. The plan depends on improving teacher effectiveness statewide, and doing so in high-need schools at a faster rate than average.

The state has some documented success in turning around its lowest-achieving schools, and seems prepared to invest. Its plan will build on what has worked – while setting the bar higher for what constitutes acceptable performance.

Total		0
Grand Total	500	359

Race to the Top

Technical Review Form - Tier 1

Oklahoma Application #3850OK-8

A. State Success Factors

	Available	Tier 1
(A)(1) Articulating State's education reform agenda and LEA's participation in it	**65**	**35**
(i) Articulating comprehensive, coherent reform agenda	5	3
(ii) Securing LEA commitment	45	25
(iii) Translating LEA participation into statewide impact	15	7

(A)(1) Reviewer Comments: (Tier 1)

(A)(1)(i)

The state's reform agenda, supported by recent legislation, attempts to be comprehensive and multifaceted. With the exception of professional development for teachers and principals that does not appear adequate enough for them to gain knowledge and expertise in the many areas of reform embodied in the plan and implementation of turnaround strategies for the lowest-achieving schools that is loosely monitored, it aligns with and develops initiatives in the some major areas of educational reform in the American Recovery and Reinvestment Act - rigorous standards and assessments, data systems that support instruction, and performance evaluation systems using student growth as a significant factor to identify highly effective teachers and principals. The overarching aim of these initiatives is improved student academic achievement, increased graduation rates and college completion, and narrowing of achievement gaps among groups of students. Some areas of the state's plan, embodied in goals, objectives, and strategies, are well thought out and logical; some are weak and ill-defined. Some performance measures and annual targets are not ambitious enough to achieve the state's goals; others are plausible given current conditions supporting reform in the state.

As a result, full points are not awarded.

(A)(1)(ii)

The MOU provided for Participating LEAs contains some modifications to the one provided by the U.S. Department of Education. Enforcement action for LEA non-performance is stipulated. The scope of the work description outlined in the draft Race to the Top Overview of Oklahoma's Plan aligns with the reform agenda outlined in Race to the Top. However, a large number of LEAs indicated conditional acceptance of the following reform elements:

1) Using performance evaluations based in significant part on student growth for decisions about compensation, promotion, tenure, and dismissal.

2) Insuring equitable distribution of teachers in high poverty and/or high minority schools.

3) Increasing the number of teachers in hard to staff subject areas.

Only 49 percent of school board presidents signed the MOU and only 26 percent of local teachers union leaders. Although the state included letters of support in the Appendix from statewide union leaders and the state leader of the school board association, the low percentages of support from these key stakeholders responsible for implementing the state's agenda at the local level are of concern.

As a result, low points are awarded.

(A)(1)(iii)

Fifty-two percent of the state's LEAs signed MOUs. These Participating LEAs represent 69 percent of the schools in the state, include the state's two largest urban districts, and represent 81 percent of the student population and 78 percent of students living in poverty. This could translate into broad statewide impact if the plan is successful. However, the likelihood of success is not strong with such limited evidence of commitment from school board presidents and local union leaders.

As a result, full points are not awarded.

(A)(2) Building strong statewide capacity to implement, scale up, and sustain proposed plans	**30**	**19**
(i) Ensuring the capacity to implement	20	12
(ii) Using broad stakeholder support	10	7

(A)(2) Reviewer Comments: (Tier 1)

(A)(2)(i)(a)

Strong leadership to implement the plan is provided by the state board of education chaired by the state superintendent of public instruction and six cross-functional, dedicated teams within the department of education. This insures experienced leadership and a lengthy track record for implementing grants from federal, state, and foundation sources. A Race to the Top director, reporting directly to the state superintendent of public instruction will lead the state's reform agenda and will manage department of education staff, including directors of charter schools and teacher/leader effectiveness, a turnaround office, a Race to the Top monitor, and data coaches to implement the state's longitudinal data system. Current department of education officials will be given additional responsibilities to support various components of the reform agenda. A separate Race to the Top Commission, appointed by the state superintendent will be established to monitor and report on progress to the state board of education and will focus particularly on the area of teacher effectiveness. In addition to this leadership structure, laws and statutes support key elements of the plan further enhancing the leadership capacity of the state to carry them out.

(A)(2)(i)(b)

The state proposes to support Participating LEAs in successfully implementing the reform plan by evaluating their progress in an ongoing way and providing feedback and data to Participating LEAs for continuous improvement. The state also plans to disseminate information to them on the components of the state's reform plan.

(A)(2)(i)(c)

To insure effective and efficient operations, the Race to the Top Director will be assisted by one of six cross -functional teams at the department of education level - the Educational Leadership Team. In addition, the

state's Commission for Teacher Preparation will assist with initiatives involving professional development and teacher and principal preparation programs. A Race to the Top Program Monitor will be responsible for grant administration, oversight, budget reporting, monitoring, performance measure tracking and reporting, and fund disbursement.

(A)(2)(i)(d)

In its plan for funding the full cost of its reform agenda, the state used an all funds approach drawing money and resources from Title I, Title IIA, Special Education, and partnership personnel and services to supplement the Race to the Top grant request. While this is impressive, it is unclear whether the figures are based on current or expected funds and allocations.

(A)(2)(e)

The state backs up its claim in the application narrative that it will continue to use fiscal, political, and human capital resources to support the reform initiatives after the Race to the Top grant cycle ends by citing the legislative mandates and statutes now in place in the state and strong stakeholder support for the Race to the Top effort. However, no mention is made of fiscal support beyond the grant cycle.

While the state's plan for insuring the leadership, smooth operation, and financial resources for supporting Participating LEAs are in place for implementation and are strong, the plan for sustainability and providing support for Participating LEAs is not adequate. Funding beyond the grant cycle has not been identified and evaluation of progress and dissemination of information efforts are too vague to establish credible evidence that the state has the full capacity to implement its reform plans. As a result, full points are not awarded.

(A)(2)(ii)(a)

One hundred and fifty letters pledging support for the state's application for Race to the Top funds were provided in the Appendix. The Oklahoma Education Association and the Oklahoma American Federation of Teachers wrote letters of support indicating backing from their leaders as the Cooperative Council for Oklahoma School Administrators, the statewide principals association, and the association of school boards. Letters were included from institutions of higher education, businesses, community groups, parent organizations, cultural organizations, officers of foundations, civic associations, and political and government leaders.

Of continuing concern is the low rate of sign off from local school board presidents and local union leaders. Because of their key roles in implementing the reform agenda of the state, this factor could influence the overall capacity of the state to reach its goals.

As a result, full points are not awarded.

(A)(3) Demonstrating significant progress in raising achievement and closing gaps	**30**	**18**
(i) Making progress in each reform area	5	5
(ii) Improving student outcomes	25	13

(A)(3) Reviewer Comments: (Tier 1)

(A)(3)(i)

The state has made progress in some of the four reform areas of the American Reinvestment and Recovery Act and cites as examples the following:

1) raising cut scores on the state's proficiency tests to align with tests from the National Assessment of Educational Progress (NAEP) in spite of a predictable drop in scores from 2008 to 2009.

2) developing and piloting a formula and rating scale for a teacher and principal performance evaluation system (TLE) based in significant part on student growth data using a Bill and Melinda Gates Foundation grant.

3) using American Reinvestment and Recovery Act (ARRA) funds for supporting the development of a P-20 longitudinal data system.

4) using a web-based platform for school improvement planning and design (WISE) in low-achieving schools.

As a result of this progress, full points are awarded.

(A)(3)(ii)

The state does not have a strong track record for raising students' academic performance levels and closing achievement gaps among groups of students. On the state's Academic Performance Index (API), total scores showed a steady increase from the 2004-2005 school year to the 2008-2009 school year. However, there is one year of missing achievement data - 2007-2008 – when cut scores were raised. Also, when calculating the state's API for 2009, achievement standards were applied from the previous year to offset the effects of the cut scores for one year. This makes true comparisons difficult. The four year graduation rates for the state decreased slightly from 2007-2008 to 2008-2009, but have remained relatively flat since 2003. Some test data were not labeled so graphs were difficult to interpret. Gains on standards-based tests in reading and mathematics from Grade 3 - Grade 8 have been modest overall. No achievement gap data were presented on standards-based tests of reading and mathematics. NAEP scores in math and reading at Grade 4 and Grade 8 have shown improvement for low-income and minority students that is only slightly higher than the national average.

No explanation was provided for actions that contributed to the maintenance of graduation rates or other related actions that might have influenced student performance.

As a result, points in the low medium range are awarded.

Total	125	72

B. Standards and Assessments

	Available	Tier 1
(B)(1) Developing and adopting common standards	**40**	**40**
(i) Participating in consortium developing high-quality standards	20	20
(ii) Adopting standards	20	20

(B)(1) Reviewer Comments: (Tier 1)

(B)(1)(i)

(a) The state is participating in the Common Core State Standards Initiative led by the National Governors Association and the Council of Chief State School Officers to develop Common Core State Standards that

are internationally benchmarked and offer K-12, grade-by-grade standards in English language arts and mathematics.

(b) The consortium involves 48 states, two territories, and the District of Columbia.

As a result, full points are awarded.

(B) (1) (ii)

According to the application narrative and timeline, the state's Board of Education plans to adopt the Common Core State Standards through an expedited emergency rulemaking process in July 2010 since the state legislature is out of session at that time. The Governor has agreed to confirm the adoption immediately. The combined effect of the adoption and confirmation will be legally binding with the full effect of the law.

As a result, full points are awarded for this criterion.

(B)(2) Developing and implementing common, high-quality assessments	**10**	**10**
(i) Participating in consortium developing high-quality assessments	5	5
(ii) Including a significant number of States	5	5

(B)(2) Reviewer Comments: (Tier 1)

(B)(2)(i)

The state is a member of the Achieve consortium, the Partnership for the Assessment of Readiness for College and Careers, formed to develop common, high-quality, summative assessments aligned to the Common Core State Standards in English language arts and mathematics for grades 3 – 8 and high school. A letter in the Appendix signed by Dr. Michael Cohen, President of Achieve, confirms that the state is working collaboratively with other states to develop and implement these common assessments.

As a result, full points are awarded.

(B)(2)(ii)

The Partnership for the Assessment of Readiness for College and Careers of which the state is a member involves 27 states.

As a result, full points are awarded.

(B)(3) Supporting the transition to enhanced standards and high-quality assessments	**20**	**10**

(B)(3) Reviewer Comments: (Tier 1)

(B)(3)

The state's application includes a plan for supporting a statewide transition to enhanced standards and assessments listing goals, key activities, a timeline, and generically designated responsible parties. However, the professional development plan, particularly in the use of data to inform and shape classroom instruction, is vague. In addition, performance measures do not include all aspects of the plan and are not aggressive enough.

Strengths include:

- Use of an independent contractor, Achieve, to match Common Core State Standards with existing state standards over the summer to save some steps in the transition process.
- Linking the Common Core State Standards to PreK curriculum for young children and to college and career preparation programs for older students.
- The development of technology tools and resources, including an electronic bank of free lessons from external sources, such as Thinkfinity, for mathematics, science, reading and writing. Electronic tools will also provide the opportunity for teachers to develop lessons plans online matched to standards.
- Producing communication materials to explain Common Core Standards to stakeholders.
- Focusing the work of teachers designated as Master Teachers in the state's Master Teachers coaching program on standards-based instruction.

Weaknesses include:

- Vagueness in outlining the format, delivery, and frequency of professional development in a key professional development area for teachers – using data to inform and shape standards-based instruction. It is unclear from the application narrative how teachers will receive the deep, focused training they need to use data in meaningful ways for improving their practice.
- Weak performance measures. The target of 80 percent use of lessons and work samples that are aligned with Common Core State Standards by the end of the grant period, the 20013-2014 school year, is not ambitious enough. The state's transition activities, if robust enough, should result in 100 percent use much earlier in the grant cycle. In addition, aspects of the transition plan are not included in the performance measures. Annual targets for these important activities are necessary to measure progress across all parts of the plan.

As a result, points in the medium range are awarded for this criterion.

Total	70	60

C. Data Systems to Support Instruction

	Available	Tier 1
(C)(1) Fully implementing a statewide longitudinal data system	**24**	**16**

(C)(1) Reviewer Comments: (Tier 1)

(C)(1)

Based on information presented in the application narrative, the state has fully completed eight of the twelve elements outlined in the America COMPETES Act. The state recently received a federal Longitudinal Data System Grant to complete two remaining elements – a teacher ID system matched to students taught and student-level transcript information.

Two points per America COMPETES Act elements were awarded for each element for a total of 16 points.

(C)(2) Accessing and using State data	**5**	**4**

(C)(2) Reviewer Comments: (Tier 1)

(C)(2)

While the state's proposal for an integrated system for combining disparate information sources into one common source, the P-20 Longitudinal Data System, is well described, there is little information in the application narrative to indicate how the state expects to use the longitudinal data that will populate the system to improve the effectiveness of policy, instruction, operations, management, and resource allocation. The proposed system will enable the state and LEAs to measure student growth by teachers, by class, by school, and by district. Differentiated access portals are expected to allow access for a range of users including schools and LEAs, parents and students, policy makers, and researchers. However, it is unclear whether and how this increased access and large quantity of information will be turned into usable knowledge for improvement and decision-making.

As a result of this lack of clarity, full points are not awarded.

(C)(3) Using data to improve instruction	**18**	**7**
(i) Increasing the use of instructional improvement systems	6	3
(ii) Supporting LEAs, schools, and teachers in using instructional improvement systems	6	2
(iii) Making the data from instructional improvement systems available to researchers	6	2

(C)(3) Reviewer Comments: (Tier 1)

(C)(3)(i)

The state's plan outlines goals, objectives, and activities it will undertake to produce an instructional improvement system with an array of tools and resources for teachers and principals, but an extensive time lag between the installation of the system in schools in Participating LEAs and its actual use by educators could compromise the state's effort to accomplish its goal for this initiative.

The state's plan is to take multiple instructional resources available in the state, create a single system of tools and resources, and implement them in all participating LEAs. Tools and resources include electronic grade books, portfolios of student work to standards, videos of highly effective lessons, and professional learning resources for teachers as well as results of formative and summative evaluations matched to the Common Core State Standards will be included. However, performance measures for this goal contain annual targets that indicate a slow process of adoption. Although the state's plan is to equip every Participating LEA with the system by Fall 2012, teachers and principals will not be able to use the system until Fall 2013. It is unclear why it will take so long to implement the system. However, this extensive time lag from adoption to use weakens the likelihood that the system will be fully in use by the end of the grant cycle.

As a result, points in the mid-range are awarded.

(C)(3)(ii)

The state's professional development plan for use of the instructional improvement system (IIS) is to hire six data coaches to train 400 district personnel to provide within district training using a train the trainer model. While this may be an adequate system if the goal is to train teachers to use the tools and understand the system, it is not enough to train school teams for the more sophisticated and effective use of the system for continuous improvement. Although LEAs may use their share of Race to the Top funds to hire additional coaches, it is not a requirement. As a result of these weaknesses in the plan.

As a result, points in the low mid-range are awarded.

(C)(3)(iii)

While the state describes the importance of researchers in the evaluation efforts needed to gauge the effectiveness of the state's Race to theTop initiatives, few details are provided about how researchers will have direct access to data contained in the state longitudinal data system. Issues of confidentiality, screening of data, and acceptable use protocols and procedures are not addressed.

As a result, points in the low mid-range are awarded.

Total	47	27

D. Great Teachers and Leaders

	Available	Tier 1
(D)(1) Providing high-quality pathways for aspiring teachers and principals	**21**	**13**
(i) Allowing alternative routes to certification	7	5
(ii) Using alternative routes to certification	7	4
(iii) Preparing teachers and principals to fill areas of shortage	7	4

(D)(1) Reviewer Comments: (Tier 1)

(D)(1)(i)

The state has regulations that allow alternative routes to certification for teachers that operate in addition to those run by institutions of higher education, but none for principals that is run independently of an institution of higher education. One program - Troops to Teachers - was not described in the narrative or the accompanying chart. The remaining three programs for alternative certification for teachers appear to have the five elements listed in the definition of alternative routes to certification.

As a result, points in the high medium range are awarded.

(D)1)(ii)

Two alternative routes to teacher certification - Teach for America and the American Board for Certification of Teacher Excellence (ABCTE) - are recent. Although they appear to be in use, there are no successful completions to-date. One for which data are provided has been use for a number of years.

As a result, medium points are awarded.

(D)(1)(iii)

According to self-report data, the state currently does not have a process for identifying areas of teacher and principal shortage. The state periodically conducts surveys of school districts to determine shortage areas for teachers and principals, but does not appear to have a process for systematically monitoring shortages nor for preparing teachers and principals for filling them.

As a result, medium points are awarded.

(D)(2) Improving teacher and principal effectiveness based on performance	**58**	**46**

(i) Measuring student growth	5	3
(ii) Developing evaluation systems	15	15
(iii) Conducting annual evaluations	10	8
(iv) Using evaluations to inform key decisions	28	20

(D)(2) Reviewer Comments: (Tier 1)

The state's plan outlines an overarching vision, strategies, and milestones, and embeds timelines in the narrative. However, persons/positions responsible for each strategy are very broadly designated and some key deliverables are vague. In addition, annual targets in the performance measures will not be in use until the 2012-2013 school year.

(D)(2)(i)

State statutes outline clear expectations that teacher and principal performance evaluations will be based 35 percent on student academic growth using multiple years of standardized test data and 15 percent on student academic growth in other measures of academic progress. However, the state does not yet have an approach to measuring student growth.

As a result, medium points are awarded.

(D)(2)(ii)(a & b)

A strong feature of the state's plan to include multiple ratings of effectiveness in the proposed Teacher and Leader Effectiveness Evaluation System (TLE) is the development of a system that bases 50 percent of the rating on student growth data as required by Race to the Top standards and criteria. A Race to the Top Commission will oversee the process of determining how student growth will be measured. State statutes require principal and teacher involvement in the design and development of the system. To insure fairness, both quantitative and qualitative measures will be included.

As a result, full points are awarded.

(D)(2)(iii)

A major strength of the state's plan supporting the TLE system is that annual evaluations of teachers and principals are now a requirement under a new state statute. With the continuous availability of data about student performance through the state's longitudinal data system, teachers and principals will have access to feedback on their performance in a timely way. However, it is unclear from the application narrative how the state's system will insure that feedback to principals and teachers is constructive.

As a result of this lack of clarity in the state's plan, full points are now awarded.

(D)(2)(iv)(a-d)

Strengths

- The scope of the work included in the Memorandum of Understanding for Participating LEAs requires that LEAs use data from the Teacher and Leader Effectiveness Evaluation System (TLE) to inform professional development for teachers and principals.
- The computer-based instructional information system (IIS) will link performance evaluation feedback for individual teachers and principals to professional development activities.
- The state's longitudinal data system will measure the effectiveness of professional development activities.
- Compensation related to performance evaluation will be delegated to LEAs to design specific, district -funded incentive pay systems for principals and teachers receiving superior or highly effective ratings under the TLE system.
- By state statute, ineffective principals and teachers who fail to improve will not be granted tenure and/or will be dismissed.

Weakness

- More intensive forms of professional development ,aligned with teacher evaluations, may be needed for teachers to have opportunities to improve.
- Relying on computer-based professional development may not work for needs that surface through the performance evaluation system and require more direct and personalized support.

As a result of these strengths and weaknesses, points in the high medium range are awarded.

(D)(3) Ensuring equitable distribution of effective teachers and principals	**25**	**13**
(i) Ensuring equitable distribution in high-poverty or high-minority schools	15	8
(ii) Ensuring equitable distribution in hard-to-staff subjects and specialty areas	10	5

(D)(3) Reviewer Comments: (Tier 1)

(D)(3)(i)(a-c)

Strengths

- Currently, each school district submits an Equitable Distribution Plan to the state annually. This is based on the definition of high ***quality*** rather than on highly ***effective*** teachers. The state's plan is to use the annual reporting system, but to require a reporting of highly ***effective*** teachers.
- The state will then use Race to theTop funds to develop a competitive grant program for LEAs to provide incentive pay for teachers rated as superior and highly effective with the provision that 50 percent of the funds must go to highly effective educators in high-need schools.
- The state intends to seek foundation funding to continue the incentive performance program targeted to high-need schools beyond the grant cycle. Several institutions of higher education receiving state Title IIA (Teacher Quality) funds already target their teacher preparation programs to high-need schools in urban areas.

Weaknesses

- The state's plan to improve the equitable distribution of highly effective educators to high-need schools lacks coherence and focus. While initiatives are proposed, they appear unconnected.
- Annual targets in the performance measures are too low to resolve equitable distribution issues in a timely way.

As a result of these strengths and weaknesses, points in the high mid-range are awarded.

(D)(3)(ii)

The state's plan to increase the numbers and percentage of highly effective teachers in hard to staff subjects mirrors the plan for increasing the number of highly effective teachers and principals in high-need schools.

Strengths

- In line with the state's STEM Initiative, the state will seek to expand the number of women and minorities entering STEM teaching fields.
- The state will create some pipeline strategies in collaboration with institutions of higher education and alternative certification programs to recruit, hire,and train teachers in hard to staff subjects.

Weaknesses

- The strategies proposed by the state are ineffective because they have been used before with little success.
- Performance measures list identical percentages of science, mathematics, special education and language teachers evaluated as effective as baseline data. However, since effectiveness is different than quality, the baseline data provided by the state are not credible for two reasons:

1. The likelihood of equal percentages occurring for teachers in each of different subject areas is highly doubtful.
2. Measures of effectiveness, as defined by Race to the Top criteria, that is, based in significant part on student growth, have not yet been included in the teacher performance evaluation system and therefore cannot be determined.

- Annual targets are too low to make a strong enough impact on the problem of increasing the number of effective teachers teaching in hard to staff subjects.

Because accurate, credible data have not been provided, the state may not achieve its goal in this area.

As a result, medium low points are awarded.

(D)(4) Improving the effectiveness of teacher and principal preparation programs	**14**	**10**
(i) Linking student data to credentialing programs and reporting publicly	7	7
(ii) Expanding effective programs	7	3

(D)(4) Reviewer Comments: (Tier 1)

(D)(4)(i)

The state's plan is credible and annual targets are reasonable. The state's current student information system already has the ability to link student achievement data to students' teachers and schools and to the programs through which teachers were prepared and their certification pathways. When the full P-20 Longitudinal Data System begins to share this data beginning in the 2012-2013 school year, achievement and growth data linked to teacher preparation and certification programs will be publicly reported in an annual report and on the department of education's website.

Full points are awarded.

(D)(4)(ii)

Th state's Commission fo Teacher Preparation will have access to teacher and principal performance evaluation data from the Teacher and Leader Effectiveness Evaluation System (TLE) linked to the state's

teacher and principal preparation programs to allow the continuous improvement of teacher preparation programs and to make decisions regarding accreditation. Although the state proposes to expand preparation programs that are successful in producing effective teachers and principals, details on how this will be accomplished are not provided in the plan.

Because details on expansion were not provided, low medium points are awarded.

(D)(5) Providing effective support to teachers and principals	**20**	**10**
(i) Providing effective support	10	5
(ii) Continuously improving the effectiveness of the support	10	5

(D)(5) Reviewer Comments: (Tier 1)

(D)(5)(i)

The state's plan is to delegate responsibility for professional development to Participating LEAs and will require each LEA to submit comprehensive professional development plans annually to the department of education for approval based on the instructional needs of the students. While a grid was provided with the overall content topics, they were too general to provide useful guidance to LEAs. No mention was made of specific formats for professional development, recommended amounts and frequency, or provision of multiple opportunities for teachers and principals to participate. The priority professional development topics,aligned to the Race to the Top priorities, listed by the state are also general. The state does propose providing LEAs with a pre-approved list of comprehensive professional development plans based on national research, but it is unclear whether these plans will be useful models for LEAs without more explicit information about their design and format. Also, by requiring so many priority topics in an annual plan, the state may be encouraging superficiality rather than depth and focus.

As a result, points in the mid-range are awarded.

(D)(5)(ii)

The state has provided a number of ways it intends to evaluate the effectiveness of professional development and has included activities and timelines as well as a very general list of departments and entities responsible for implementation of the evaluation plan. The fact that no deliverables or milestones are listed, the timeline is broad, and responsible parties are not explicitly named weakens the plan and the likelihood that it will be carried out as outlined.

As a result, points in the mid-range are awarded.

Total	138	92

E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	**10**	**10**

(E)(1) Reviewer Comments: (Tier 1)

(E)(1)

Under state law, the state has the legal authority to intervene directly in the state's persistently lowest-achieving schools and LEAs. State law also provides for the department of education to assume control of schools that remain on the school improvement list. Full points are awarded.

(E)(2) Turning around the lowest-achieving schools	**40**	**17**
(i) Identifying the persistently lowest-achieving schools	5	5
(ii) Turning around the persistently lowest-achieving schools	35	12

(E)(2) Reviewer Comments: (Tier 1)

(E)(2)(i)

The state has a process and plan for identifying its persistently lowest-achieving schools based on a definition approved by the U.S. Department of Education in April 2010.

As a result, full points are awarded.

(E)(2)(ii)

While the state's plan calls for its lowest-achieving schools to select one of the four school intervention models designated by the Race to the Top criterion and by the scope of the work document accompanying the Memorandum of Understanding signed by each Participating LEA, it is difficult to find a coherent approach to school turnaround in the application narrative. Several strategies are presented, such as recruiting highly effective teachers and leaders and inducing ineffective educators to leave the lowest achieving schools, establishing a turnaround office and hiring turnaround specialists to provide technical assistance, awarding substantial Race to the Top grants ($250,000) to each school, and channeling additional resources to the schools. In addition, elements from a turnaround model developed by Mass Insight Education are proposed for use. However, there is no indication of how these considerable resources will coalesce into a powerful enough master plan to be an effective turnaround effort. Because the schools will have a great deal of leeway in how and what they choose to do as well as a high degree of autonomy within their LEAs, a plan for how they will be monitored for progress is needed. The deliberative process, described in the application narrative, while commendable, is likely to be extremely time consuming. It is unclear how or whether the state will accelerate the process so that implementation can begin in a timely way. In addition, the state's experience in interventions in low performing schools is limited. For example, the eight school closings and three restarts the state engaged in since the 2004-2005 school year appear to be due to enrollment issues or redistricting rather than true interventions.

As a result of these considerable concerns with the state's application narrative, evidence, plan, and timelines, points in the low medium range are awarded.

Total	50	27

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	**10**	**6**
(i) Allocating a consistent percentage of State revenue to education	5	3
(ii) Equitably funding high-poverty schools	5	3

(F)(1) Reviewer Comments: (Tier 1)

(F)(1)(i)

The percentage of the state's revenues used to support elementary, secondary, and public higher education - 53 percent - was unchanged from FY2008 to FY2009.

As a result, points in the medium range are awarded.

(F)(1)(ii)

To determine annual allocations to schools and districts, the state uses a calculation based on enrollment with weights added based on grade level and on student needs and characteristics The application makes no mention of policies that address how funds are distributed within LEAs and also makes no mention of Title I funds and policies governing the distribution of Title I funds within school districts.

As a result, 3 points are awardd.

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	**40**	**36**
(i) Enabling high-performing charter schools "(caps)"	8	8
(ii) Authorizing and holding charters accountable for outcomes	8	8
(iii) Equitably funding charter schools	8	8
(iv) Providing charter schools with equitable access to facilities	8	4
(v) Enabling LEAs to operate other innovative, autonomous public schools	8	8

(F)(2) Reviewer Comments: (Tier 1)

(F)(2)(i)

As a result of a recent revision of the state's Charter School Act, the state has no annual cap on the number of charter schools that may be authorized. Charter schools may be authorized in any district in the state with a school on the state's school improvement list or in any LEA with 5000 or more students and in any county with at least 500,000 students.

Full points are awarded.

(F)(2)(ii)

State law outlines procedures for the approval, monitoring, accountability, reauthorizing, and closing of charter schools. The effectiveness of charter schools is measured by student achievement.

Full points are awarded.

(F)(2)(iii)

Charter schools receive the same per pupil amount as traditional public schools in the state minus five percent which goes to the district in which the charter school is located for fees and administrative services. Since with the district fee the allocation is greater than 90 percent of that provided for traditional students, full points are awarded.

(F)(2)(iv)

The state does not impose any facility-related requirements on charter schools that are stricter than those applied to traditional public schools. However, the application provides no evidence that the state provides funding for facilities for charter schools. Charter schools receive $50,000 for start up costs and training. It is not clear whether any of this can be used for facilities.

As a result, points in the mid-range are awarded.

(F)(2)(v)

The state has examples of innovative schools and alternative education programs operating in LEAs but with autonomy and flexibility. As a result, full points are awarded.

(F)(3) Demonstrating other significant reform conditions	**5**	**5**

(F)(3) Reviewer Comments: (Tier 1)

(F)(3)

The state has demonstrated some efforts to create conditions favorable to education reform and innovation.

The state has created a strong pre-school program and enhanced the requirements and qualifications of pre-school teachers. In addition it piloted a program for infants and toddlers. Partnerships with Teach for America and KIPP charter schools introduced innovative programs. A grant from the Bill and Melinda Gates Foundation allowed the state to do some important groundwork for a performance evaluation system for teachers and principals based in significant part on measures of student growth.

As a result, full points are awarded.

Total	55	47

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1
Competitive Preference Priority 2: Emphasis on STEM	**15**	**15**

Competitive Reviewer Comments: (Tier 1)

The state has a strong plan for its STEM initiative that includes the three elements outlined in the criterion for the Competitive Preference Priority for STEM. The state's plan addresses the need for improved standards, assessments, instruction, and programs in the STEM disciplines of science, technology, engineering, and mathematics to insure students, including women and minorities, have opportunities to learn them well and are career and college ready. To oversee and set priorities for the many STEM initiatives in the state, the Governor will appoint a STEM Coordinating Council. The state already has an established program for students at the Oklahoma School of Science and Mathematics that has been expanded to 14 regional centers around the state. Project Exploration pairs students with scientists who serve as mentors for them and engage them in activities that explore the STEM disciplines. The state will step up efforts to recruit women and minorities for Advanced Placement courses in science and math. The University of Oklahoma, with state sponsorship, offers teachers a three year training institute to implement inquiry science and technology integration based on STEM disciplines in their schools. Partnerships with museums and research centers in the state provide both programs for students and training for teachers. Under the state's Race to the Top reform plan, Participating LEAs are required to include their system for training teachers in the content and pedagogy of STEM disciplines in their Comprehensive Professional Development Plans. As a result of these considerable efforts, the state's STEM initiative meets all the requirements described in the Race to the Top reform agenda.

Total	15	15

Absolute Priority - Comprehensive Approach to Education Reform

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		**No**

Absolute Reviewer Comments: (Tier 1)

A significant weakness of this application is the tepid support from school board presidents and local union leaders in Participating LEAs. In spite of letters of support from the leaders of the statewide teachers unions and the state school board association, their endorsements have not influenced local leaders. Without the strong support of two major groups of stakeholders - school board presidents and teachers - the likelihood of the success of the reform effort is doubtful. Another concern is that three major elements of the state's plan - improving teacher and principal effectiveness through performance evaluations based in significant part on student growth, ensuring equitable distribution of highly effective principals and teachers in high poverty and/or high minority districts, and increasing the number and percentage of effective teachers teaching hard to staff subjects - were not fully accepted by a number of schools throughout the state. A major problem is the slow pace and poor definition of the plan for turning around the lowest performing schools. Without coherence and direction, the considerable resources being channeled to the schools will not result in genuine gains in achievement for students. A fourth problematic area is professional development woven all through the four major reform areas because it is a major factor in assisting teachers and principals in making the transition to more rigorous standards and assessments (B), in insuring they have the skills to use the longitudinal data system and the instructional information system (C), in equipping them with the knowledge,skill, and competence they need to become highly effective educators (D), and in developing their expertise to engage in the process of continuous improvement to turn around the lowest achieving schools (E). Professional development that is scattered, shallow, disjointed and fails to establish a focus, as it appears to be based on the application narrative, will not build the capacity needed to sustain these considerable reform initiatives over time.

The state's plan does include strong components: the Teacher and Leader Evaluation (TLE) system for evaluating the performance of teachers and principals using student growth as a significant factor in determining effectiveness, legislation that supports educational reform, and a willingness to redesign state organizational structures to align with the priorities of the state plan. However, these components were not strong enough to offset the weaknesses identified in the plan. As a result, the state's application did not meet the absolute priority.

Total		0

Grand Total	500	340

Race to the Top

Technical Review Form - Tier 1

Oklahoma Application #3850OK-6

A. State Success Factors

	Available	Tier 1
(A)(1) Articulating State's education reform agenda and LEA's participation in it	**65**	**55**
(i) Articulating comprehensive, coherent reform agenda	5	5
(ii) Securing LEA commitment	45	38
(iii) Translating LEA participation into statewide impact	15	12

(A)(1) Reviewer Comments: (Tier 1)

Oklahoma's Race to the Top agenda is comprehensive and cohesive and built on a foundation of the state education reforms enacted from 2000 to 2010. These reforms are student-focused and designed to ensure Oklahoma increases the number of students graduating from high school college- and career-ready. Oklahoma's six goal plan to accelerate school improvement aligns with the four core areas of education reform: Two of Oklahoma's Race to the Top goals address all of the four education reform areas in the ARRA law. Specifically, Oklahoma's Goal Five is to further encourage high quality school models, both charter and non-charter. Recent legislation continues Oklahoma's record of commitment to innovation and will allow these models to expand. Goal Six is also applicable to all four core Race to the Top areas of focus: developing course content, teacher experience, student engagement and data analysis to further Oklahoma's integration of the STEM content areas into all aspects of public, career and higher education.

In addition, Oklahoma's Race to the Top plan has the strong support of Oklahoma's two largest districts (that have already begun implementing parts of the plan). LEAs impacting 278 of the state's schools, have committed to participate in all applicable areas of Oklahoma's Race to the Top plan. Commitment was gained through a series of regional meetings, a broad steering committee supported by working groups in each of the reform areas, and leadership of the Governor, State School Superintendent, and legislative leadership. Both candidates for state school superintendent have provided letters committing their support to make implementation of Oklahoma's plan a priority in 2011 and beyond. The two largest teachers unions/associations, and the associations representing school administrators and school boards have pledged their support as well.

With 49% of the LEAs covering over 80% of Oklahoma's students participating and committed to Oklahoma's Race to the Top goals, Race to the Top Participating LEAs will demonstrate how measurable gains in learning outcomes and support from the state of Oklahoma will lead to achievable, yet ambitious, goals for all schools by 2015.

The plan will be strengthened when the specifics of the Teacher and Leader Effectiveness Evaluation (TLE) system are further spelled out and there are additional commitments from local associations that they will commit to all provisions of the plan.

(A)(2) Building strong statewide capacity to implement, scale up, and sustain proposed plans	**30**	**30**
(i) Ensuring the capacity to implement	20	20
(ii) Using broad stakeholder support	10	10

(A)(2) Reviewer Comments: (Tier 1)

The state's reform plan and legislation was produced through a combination of grassroots' input and advice of national experts. In addition to a steering committee of leaders that included union representatives, business leaders, philanthropists, teachers, school association members, higher education, and the Oklahoma State Department of Career and Technology Education, workgroups of more than 60 subject-matter experts advised and guided this plan's development.
Strong Leadership and Dedicated Cross functional Race to the Top Teams with the responsibility and authority vested in the State Board, team support is in place for: state plan implementation; district level support to insure replication of effective practices; accountability for LEA performance; overall grant accountability for budget, performance measure tracking and reporting and disbursement; alignment of other education to support goals of the state plan; and strategic sustainability of fiscal, political and human capital resources for successful reforms after the grant period.

Authority for enforcing grant implementation and accountability will be by the State Board of Education. The Board has broad statutory and constitutional powers and duties and sets the policies for the Oklahoma State Department of Education (which has fiscal responsibility for state and federal funds).
To provide for the efficient and effective implementation of the grant and support for the Race to the Top Commission, the Oklahoma State Department of Education Leadership Team will work with the Race to the Top Director and staff, who will also: coordinate and report on the effort of the state to implement the federal Race to the Top program; work closely with state leaders to determine the requirements imposed on and opportunities afforded to the state by the federal Race to the Top program, as well as the most efficient and productive use of Race to the Top funding; monitor the flow of federal Race to the Top program funds to ensure compliance with all requirements of the law and transparency of the process; Ensure that adequate reporting and compliance mechanisms and safeguards regarding the federal Race to the Top program are in place.

Local districts, led by superintendents and principals and guided by elected school boards, will design individualized scope-of-work descriptions and lead the implementation of the reforms in their districts in alignment with the state's Race to the Top Plan with advice from the Oklahoma State Department of Education Race to the Top Director and her team. The Oklahoma State Department of Education, with its supporting partners, will provide the framework and guidance for execution of the plan at a local level. It is important to note that LEAs have been significantly involved in the design of this application through their participation in workgroups and regional strategy dialogues with community stakeholders for over a year. This description of participation indicates broad stakeholder support and could be stronger if more local associations committed to support the plan.

The Race to the Top Director will organize the staff necessary to support LEA's efficiently and effectively. The Oklahoma State Department of Education will develop, and update as data and additional research become available, instruction courses for educators on each element of the reform plan and demonstrates a strong commitment to implementation.

Oklahoma has coordinated and reallocated education funds so that they align with the state's Race to the Top goals. Existing employees and infrastructure at the Oklahoma State Department of Education and the Commission of Teacher Preparation will support the state reform plan by providing data and instruction to LEAs. Oklahoma's school reform plan is also supported by the Governor's commitment of his discretionary ARRA allocation to statewide projects that leverage additional local and private dollars. Committing funds to support the plan indicates a capacity to implement.

The focus of the state's Race to the Top plan is to increase student success and close the achievement gap by investing in foundation-level systems that will create and sustain long-term improvements in education. The reforms will be sustained by legislative mandates, the publishing of reliable data and continued broad stakeholder involvement in implementation.

(A)(3) Demonstrating significant progress in raising achievement and closing gaps	**30**	**30**
(i) Making progress in each reform area	5	5
(ii) Improving student outcomes	25	25

(A)(3) Reviewer Comments: (Tier 1)

Oklahoma's initiative in assessment reform is built upon experience with student assessment and school accountability. According to the plan, in June 2009, the State raised its state assessment cut-scores on the Oklahoma Core Curriculum Tests at grades 3-8 to address a proficiency divide between state assessment results and National Assessment of Educational Progress (NAEP) scores.
Oklahoma has made progress intervening in its lowest achieving schools through its Comprehensive School Improvement System. The School Improvement System provides comprehensive and data-driven support for all struggling schools, and as of Spring 2010, is now supported and aligned with WISE—a web-based platform for school improvement planning and design developed in partnership with the Center for Innovation and Improvement. This data-driven analysis targets changes needed in the school's performance indicators so that the most impactful changes to support student growth are prioritized.
Oklahoma raised the cut-scores on all ESEA reading and mathematics tests in grades 3-8 in order to raise student achievement expectations and mirror NAEP proficiency markers.

Total	125	115

B. Standards and Assessments

	Available	Tier 1
(B)(1) Developing and adopting common standards	**40**	**40**
(i) Participating in consortium developing high-quality standards	20	20
(ii) Adopting standards	20	20

(B)(1) Reviewer Comments: (Tier 1)

The plan states that Oklahoma has participated in the Common Core State Standards Initiative led by the National Governors Association Center for Best Practices (NGA Center) and the Council of Chief State School Officers (CCSSO) to develop internationally benchmarked K-12 grade-by- grade standards (reading/language arts and math). The Oklahoma State Department of Education has reviewed the draft standards in comparison to the current State Priority Academic Student Skills (PASS) standards. The Oklahoma State Department of Education has committed to adopt the standards in final form by August 2, 2010.

(B)(2) Developing and implementing common, high-quality assessments	**10**	**10**
(i) Participating in consortium developing high-quality assessments	5	5

(ii) Including a significant number of States	5	5

(B)(2) Reviewer Comments: (Tier 1)

Oklahoma has joined Achieve's Partnership for Assessment of Readiness for College and Careers (PARCC) to develop high-quality assessments aligned with the Common Core Standards. Evidence of the state's participation in this consortium is found at Appendix B2-B.
With a multi-state consortium, Oklahoma is planning to participate in an assessment partnership to develop and implement summative assessments that are aligned to the Common Core standards, that can be used as part of the statewide assessment system, and that will enable comparability of results across a number of states and be anchored in college and career readiness.

(B)(3) Supporting the transition to enhanced standards and high-quality assessments	20	17

(B)(3) Reviewer Comments: (Tier 1)

Oklahoma's plan suggests the state is positioned to implement an achievable plan for supporting statewide transition to internationally-benchmarked K-12 standards aligned with college and career readiness. In 2005, the state Legislature enacted the Achieving Classroom Excellence (ACE) Act to provide a framework for all Oklahoma school systems to implement higher standards specifically in a college-preparatory/work-ready high school curriculum, create and implement high-stakes assessments, use data to drive remediation and instill the rigor and relevance needed to prepare ALL students for college and careers. (See Appendix A1-C, Achieving Classroom Excellence.)

The Action plan, located behind the MOU in the appendix, would be strengthened if timelines and responsible parties for each activity proposed were added.

Total	70	67

C. Data Systems to Support Instruction

	Available	Tier 1
(C)(1) Fully implementing a statewide longitudinal data system	24	16

(C)(1) Reviewer Comments: (Tier 1)

Oklahoma is making progress toward full implementation of its integrated P-20 SLDS and is taking action in accordance with well-defined plans to complete all elements specified by the America COMPETES Act. Specifically, Oklahoma is linking four vital data systems: the Wave (the Oklahoma State Department of Education's K-12 data system), the CareerTech, Higher Education and Oklahoma Employment Security Commission data systems with the further expectation that this integrated system will link with social service databases in the future.
The SLDS fulfills nine of the twelve elements of the America COMPETES Act, with partial completion (with a plan developed by the P-20 Data Council to complete the remaing three) of the others according to the plan however, there are actually only eight completed, with one remaining in the design phase and three others needing additional work.

(C)(2) Accessing and using State data	5	5

(C)(2) Reviewer Comments: (Tier 1)

Oklahoma has a solid plan to use student growth as the basis of decision making at all levels of education, which include the following: improving teacher preparatory programs, certification and professional development programs by tying teacher leader evaluations (35% based on student growth) back to the college preparatory, certification and professional development programs; district and school site decisions on teacher and principal selection, compensation, retention, assignment, promotion (particularly to career (*i.e.* tenure) status), and dismissal - whether for instructional ineffectiveness or reduction in force; intervention strategies in low performing schools; teacher classroom instruction and individualized student instruction needs as used by teachers, parents (guardians) and students to target additional learning needs.

(C)(3) Using data to improve instruction	**18**	**13**
(i) Increasing the use of instructional improvement systems	6	5
(ii) Supporting LEAs, schools, and teachers in using instructional improvement systems	6	4
(iii) Making the data from instructional improvement systems available to researchers	6	4

(C)(3) Reviewer Comments: (Tier 1)

Oklahoma is planning to use the state portion of its Race to the Top funds to purchase or develop formative and interim assessments for grades K through 8th, and the plan is for participating LEAs to use their Race to the Top funds to pay for the assessments in grades 9 through 12. With information from these assessments, teachers will have data to triangulate students' needs with the confidence that their response will be instructionally applicable and fast enough to make instructional adjustments with an opportunity to impact learning, however the two line time line for implementation seems stretched.

Oklahoma plans to shift to data-driven instruction and decision-making and this movement is dependent upon establishing a core set of technical and pedagogical skills among teachers and leaders. Oklahoma expects all staff to implement these skills, and the improvements in student achievement growth and teacher/leader performance resulting from their use, could make data-driven instruction and decision-making the norm in all Oklahoma schools. A more specific plan to help teachers use data in decision making would be helpful.

It is important to note that the plan is for the Oklahoma State Department of Education, the Commission for Teacher Preparation and Colleges of Education will integrate training and support around using data to improve instruction into Oklahoma's teacher and principal preparation and certification programs. The plan is for all new teachers and principals, as well as those who transfer in from other states, to receive the training and support necessary to access and use the system. Some specific provision for how data is used and how it will be maintained for confidentiality purposes is needed.

Total	47	34

D. Great Teachers and Leaders

	Available	Tier 1
(D)(1) Providing high-quality pathways for aspiring teachers and principals	**21**	**15**
(i) Allowing alternative routes to certification	7	5

(ii) Using alternative routes to certification	7	5
(iii) Preparing teachers and principals to fill areas of shortage	7	5

(D)(1) Reviewer Comments: (Tier 1)

Oklahoma has four alternative routes to certification for teachers and one alternative certification program for principals. All five alternative routes, including those provided by private contractors, must meet state accreditation standards for teacher and principal preparation programs. The alternative teacher and principal certification options meet each of the five criteria in the Race to the Top definition of alternative certification route, however the singular program for principals could be expanded.

Oklahoma has provided alternative routes to teacher certification since 1990 and has expanded those routes in the past two years, while maintaining mentoring, subject area competency, and pedagogy training. In the previous year, there were a total number of 12,128 teaching certificates issued. Of that number, 4251 teachers (or 35 percent) completed an alternative certification program to receive their certificate. With regard to principals, there were 1,847 newly issued principal certificates in 2009, 60 (4 percent) of which were obtained through the alternative certification pathway the state adopted in 2005. Oklahoma has been working in this area for a while and could conceivably be further ahead, especially in regards to principal retraining, which is not mentioned.

To increase the number of highly effective teachers and leaders the state plans to identify areas of teacher and principal shortage. To assist in development of this data, Oklahoma's LEAs are required to submit to Oklahoma State Department of Education information regarding the areas of teacher and principal shortage. Additional detail about how principals will be trained to meet shortages would be beneficial.

(D)(2) Improving teacher and principal effectiveness based on performance	**58**	**51**
(i) Measuring student growth	5	4
(ii) Developing evaluation systems	15	13
(iii) Conducting annual evaluations	10	9
(iv) Using evaluations to inform key decisions	28	25

(D)(2) Reviewer Comments: (Tier 1)

Oklahoma plans to implement an evaluation system based on student academic growth and qualitative assessments and use evaluations to guide the preparation, selection, retention, development, promotion, compensation, dismissal, and reductions in force of teachers and principals, Oklahoma plans to reward educator professionalism and improve teacher and principal effectiveness. (See Appendix A1-A Senate Bill 2033 "Teacher Leader Effectiveness Act". Oklahoma has developed a data system to help to monitor student-growth in accordance with a teacher and principal evaluation system that could result in improvements in student achievement, but measurement of student growth needs to be further developed and clarified.

The Teacher Leader Effectiveness Evaluation (TLE) provides feedback on specific teacher and principal behaviors that will enable educators to improve student learning, particularly when implemented in concert with the Participating LEA's Instructional Improvement Systems (IISs).

Senate Bill 2033 requires teacher and principal involvement. The Race to the Top Commission's process of designing the TLE system, including the specific assessments and metrics comprising the quantitative

portion (student growth metric) of the evaluation score for each grade level and class is planned to be conducted with ongoing participation of teachers and principals, whose association representatives are members of the Race to the Top Commission and this needs to occur before full credit can be given to the plans ambitious timeline in terms of implementation.

The qualitative and quantitative (student-growth based) portions of the TLE attempt to provide a holistic picture of each teacher's and principal's performance and may be used to inform instructional improvement as well as the key personnel decisions and actions described in the plan when more fully developed.

With meaningful performance information resulting from the TLE and the state's data systems (including its IISs and statewide longitudinal data system (SLDS)), teachers, principals and policymakers should be able to make decisions that ultimately result in a pipeline and pool of educators. Senate Bill 2033 may provide leverage of student growth measures through the TLE system and may drive decisions to maintain or make staff changes regarding career status, retention, reductions in force, and compensation. The state has taken on education reform through Senate Bill 2033. Teachers and principals who are ineffective as measured by the TLE and fail to improve, the plan is to not retain them.

Evaluation data linked to student growth is planned for aggregation at a school and district level, education leaders at the school, district, and state level ought to be able to identify trends using the IISs and the SLDS to target professional development to the needs of the individual teacher, a grade level or department, a school, a district, or, if there is a broad-based challenge, the whole state.

The State's Race to the Top Plan includes several options for rewarding educators for their effectiveness—all tied to the TLE. Senate Bill 2033 entitles teacher performance pay to be as high as 50 percent of the teacher's base salary. Beginning in the 2012-13 school year, LEAs (whether Participating LEAs or not) will have the flexibility to design and implement specific district-funded incentive pay systems. Additional guidance from the state on how growth is to be measured would be helpful in clarifying the overall plan.

Senate Bill 2033 requires that teacher and principal TLE ratings (may need a more sophisticated system for rating than is provided in the plan) drive important decisions regarding teacher promotion to career status (tenure) and teacher and principal retention.

(D)(3) Ensuring equitable distribution of effective teachers and principals	**25**	**23**
(i) Ensuring equitable distribution in high-poverty or high-minority schools	15	14
(ii) Ensuring equitable distribution in hard-to-staff subjects and specialty areas	10	9

(D)(3) Reviewer Comments: (Tier 1)

According to the state, there is neither a sufficient supply of effective teachers and principals nor is the distribution of Oklahoma's effective teachers and principals equitable. Low-income and minority students ("high-need students") who most urgently need effective teachers and principals too often have the least effective teachers and principals, and there are far fewer effective teachers of hard to staff subjects and specialty areas such as STEM, special education, and language instruction. This is excellent information but it doesn't go far enough to explain how distribution will occur.

Oklahoma school districts are currently required to develop a plan, informed by data, to ensure that students in high-need schools have equitable access to highly qualified teachers and principals and are not served by non-highly qualified teachers and principals at higher rates than other students. Additionally, the state currently identifies the distribution by school of highly qualified teachers. (See Appendix D3-B, Consolidated State Performance Report). However what is missing is a timely process for solving the problem.

(D)(4) Improving the effectiveness of teacher and principal preparation programs	**14**	**12**
(i) Linking student data to credentialing programs and reporting publicly	7	6
(ii) Expanding effective programs	7	6

(D)(4) Reviewer Comments: (Tier 1)

Oklahoma's Teacher and Leader Effectiveness Evaluation (TLE) system, which will be in use by all districts no later than 2013-2014 is a student growth based evaluation system. As mandated by the Teacher and Leader Effectiveness Act of 2010 (SB 2033), 50 percent of a teacher and leaders evaluation rating with be based on growth and 50 percent on qualitative measures. To insure educators are being prepared to be effective, the effectiveness evaluation ratings will be linked back to teacher preparation and certification programs, including alternative routes to certification beginning in 2012-2013.
Oklahoma's statutory authorization for the alternative pathway of Teach For America, Tulsa Public Schools recently recruited almost 80 corps members in 2009 and will increase the number in the fall of 2010 to 154, — serving in the district's lowest achieving schools.
The plan has many laudable provisions but needs additional support for IHE's clarifying their role and perhaps too much faith is put in market forces to determine needs. More discussion of the district role is needed also.

(D)(5) Providing effective support to teachers and principals	**20**	**18**
(i) Providing effective support	10	9
(ii) Continuously improving the effectiveness of the support	10	9

(D)(5) Reviewer Comments: (Tier 1)

Oklahoma's data systems and the Teacher and Leader Effectiveness Evaluation System (TLE) should help teachers and principals know how much and where they need to improve to increase student growth. According to the Oklahoma plan, all Participating LEAs must adopt a comprehensive professional development model either developed by the district or adopted from a model approved by the Oklahoma State Department of Education based on the needs of their district. The Oklahoma State Department of Education role shall be to evaluate the Participating LEA's professional development models to ensure that all professional development activities are: aligned to create a coordinated approach to teacher and leader growth and development; emphasize ongoing, job-embedded learning; and differentiate and link professional development offerings with educators' evaluations emphasizing student growth.
Each district's comprehensive professional development model will be based on a model that allows each district to have flexibility but accountability for student growth.
The Oklahoma State Department of Education plans to create a certification system for professional development offerings in the Spring of 2011, to be launched in the Summer of 2011, certifying the Professional Development's effectiveness and tracking its progress in the certification process. The Oklahoma State Department of Education plans to ensure that offerings meet the national standards of professional development for context, process and content standards and demonstrate impact on participant and student outcomes to qualify for ongoing certification. However, a list of topics given in the narrative is not enough guidance for LEA's to implement effectively. Plus, there is almost an overwhelming number of priorities and further clarification as to what is most important would be helpful.

Total	138	119

E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	**10**	**10**

(E)(1) Reviewer Comments: (Tier 1)

Senate Bill 268, passed in May 2009, grants the state the authority to require the alternative governance of any school identified as in need of improvement for four consecutive years. This state law also provides for the Oklahoma State Department of Education to assume control of LEAs or schools in an LEA when in certain instances a school remains on the School Improvement List.

(E)(2) Turning around the lowest-achieving schools	**40**	**34**
(i) Identifying the persistently lowest-achieving schools	5	4
(ii) Turning around the persistently lowest-achieving schools	35	30

(E)(2) Reviewer Comments: (Tier 1)

The Oklahoma State Department of Education has defined and identified the state's "persistently lowest-achieving schools" and the definition was approved by the U.S. Department of Education on April 20, 2010. Oklahoma has a list that includes twenty schools—fifteen high schools (including six from Tulsa Public Schools, and one from Oklahoma City Public Schools), three middle schools (two from Tulsa, one from Oklahoma City), and two elementary schools (one from Oklahoma City Public Schools, one from Crutcho Public Schools, a district on the outskirts of Oklahoma City) but additional specificity is needed to identify the lowest achieving schools.

In addition to helping schools and LEAs with regulatory flexibility, the Turnaround Unit plans to collect data and research findings regarding the innovative school models that have proven successful in turning around the persistently lowest-achieving schools and plans are to replicate models across the state. There are several excellent strategies listed in the plan but no clear plan and overall there is a lack of coherence and detail to call it a model.

Total	50	44

F. General

	Available	Tier 1
(F)(1) Making education funding a priority	**10**	**7**
(i) Allocating a consistent percentage of State revenue to education	5	3
(ii) Equitably funding high-poverty schools	5	4

(F)(1) Reviewer Comments: (Tier 1)

Oklahoma's revenue for public schools comes from state dedicated revenues; local revenue; and federal revenue. State appropriations of revenue are generally distributed to local school districts through a State-Aid formula that is administered by the State Department of Education. The Oklahoma Legislature

traditionally gives more than one-third of all state-appropriated revenues to public schools. In FY-2008 and FY-2009, 53% of the state's budget was directed to all levels of public education: common (K-12), career-tech and higher education. The actual dollar amounts used in support of education increased over that year but the percentage of total state appropriations was unchanged. No regulations for how LEA's are to spend the dollars are given.

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	**40**	**35**
(i) Enabling high-performing charter schools "(caps)"	8	7
(ii) Authorizing and holding charters accountable for outcomes	8	7
(iii) Equitably funding charter schools	8	8
(iv) Providing charter schools with equitable access to facilities	8	8
(v) Enabling LEAs to operate other innovative, autonomous public schools	8	5

(F)(2) Reviewer Comments: (Tier 1)

Both Senate Bill 1862 and House Bill 2753, promote the expansion of charter schools in Oklahoma by significantly revising Oklahoma's Charter Schools Act. There is no cap on numbers but it is unclear if this alone will enable additional programs.
Senate Bill 1862 requires that new charter schools give enrollment preference to eligible students residing in the school district in which the charter is located and who attend a school site listed on the school improvement list as determined by the State Board of Education.

State law does not impose any facility-related requirements on charter schools that are stricter than those applied to traditional public schools.

Oklahoma has many innovative public schools including enterprise schools, magnet and other specialty schools allowed under the state's deregulation and statutory waiver procedures, which were established in 1992, but no provisions for the sharing of bonds or local revenues for charter schools are available. Also, although the plan characterized many of the schools as innovative some sounded more traditional and further explanation is needed to clarify areas of innovation.

(F)(3) Demonstrating other significant reform conditions	**5**	**3**

(F)(3) Reviewer Comments: (Tier 1)

Oklahoma initiatives are examples of the state's efforts that demonstrate reform conditions in the state are supportive to Oklahoma's Race to the Top. For example, today in Oklahoma, 87 percent of the 4-year-olds receive a free, state-funded public education from State Pre-K, Headstart or Special Education. The state has done excellent work in the preschool area but innovation examples in other areas were not as evident in the plan.

Total	55	45

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1

Competitive Preference Priority 2: Emphasis on STEM	**15**	**15**
Competitive Reviewer Comments: (Tier 1) Oklahoma seems positioned to do well in STEM fields because they have assets such as: 57 institutions of Higher Education, 62 CareerTech locations, and STEM focused education academies and workforce training initiatives across the state, including providing programs for under represented groups.		
Total	15	15

Absolute Priority - Comprehensive Approach to Education Reform

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		**Yes**
Absolute Reviewer Comments: (Tier 1) Oklahoma's budget is one part of the part that demonstrates a commitment to the for Race to the Top reforms and demonstrates that there is financial as well as a comprehensive commitment to reform. The budget presented is designed to support attainment of the Oklahoma reform agenda and achievement of achievable performance measures along with defining how monies will be spent to support the RttT plan. These projects outlined in the plan and listed in the budget reflect Oklahoma's commitment to engaged students, effective educators and closing the achievement gap.		
Total		0

Grand Total	500	439