



UNITED STATES DEPARTMENT OF EDUCATION

JAN 10 2013

The Honorable Robert Hammond
Colorado Department of Education,
201 East Colfax Ave., Room 500
Denver, Colorado 80203

Dear Superintendent Hammond:

During the week of September 10th, 2012, a team from the U.S. Department of Education's (ED) Office of School Turnaround (OST) reviewed the Colorado Department of Education's (CDE) administration of Title I, section 1003(g) (School Improvement Grants (SIG)) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended. As part of its review, the ED team interviewed staff at the State educational agency (SEA) and two local educational agencies (LEAs). The ED team also conducted site visits to three schools implementing the SIG intervention models, where they visited classes and interviewed school leadership, teachers, parents, and students. Enclosed you will find ED's final monitoring report based upon this review.

The primary purpose of monitoring is to ensure that the SEA carries out the SIG program consistent with the final requirements. Additionally, ED is using its monitoring review to observe how LEAs and schools are implementing the selected intervention models and identify areas where technical assistance may be needed to support effective program implementation.

In line with these aims, the enclosed monitoring report is organized in two sections: (1) *Technical Assistance Recommendations*, and (2) *Monitoring Findings*. The Department will later issue a *Summary and Observations* addendum that describes the SIG implementation occurring in the schools and districts visited, initial indicators of success, and any outstanding challenges relating to implementation. The *Technical Assistance Recommendations* section contains strategies and resources for addressing technical assistance needs identified during ED's visit. Finally, the *Monitoring Findings* section identifies any compliance issues within the six indicator areas reviewed and corrective actions that the SEA is required to take.

The CDE has 30 business days from receipt of this report to respond to all of the compliance issues contained herein. ED staff will review your response for sufficiency and will determine which areas are acceptable and which require further documentation of implementation. ED will allow 30 business days for receipt of this further documentation, if required. ED recognizes that some corrective actions may require longer than the prescribed 30 days, and in these instances, will work with the CDE to determine a reasonable timeline. In those instances where additional time is required to implement specific corrective actions, you must submit a request for such an extension in writing to ED, including a timeline for completion for all related actions. Each State that participates in an onsite monitoring review and that has significant compliance findings in one or more of the programs monitored will have a condition placed on that program's grant award specifying that the State must submit (and receive approval of)

documentation that all compliance issues identified in the monitoring report have been corrected. When documentation sufficient to address all compliance areas has been submitted and approved, ED will then remove the condition from your grant award.

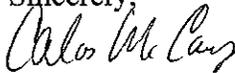
With regards to the *Technical Assistance Recommendations* provided, we encourage you to employ these strategies to further support the effective implementation of the SIG program. ED staff will follow up with your staff over the next few months to see how the CDE is working to address these issues and make use of this technical assistance.

Please be aware that the observations reported, issues identified, and findings made in the enclosed report are based on written documentation or information provided to ED by SEA, LEA, or school staff during interviews. They also reflect the status of compliance in Colorado at the time and locations of ED's onsite review. The CDE may receive further communication from ED that will require it to address noncompliance occurring prior or subsequent to the onsite visit.

The ED team would like to thank the CDE staff for their hard work and the assistance they provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to working further with your staff to resolve the issues contained in this report and to improve the quality of the SIG program in Colorado.

Sincerely,



Carlos McCauley

Group Leader

Office of School Turnaround

Enclosure

cc: Patrick Chapman, Executive Director-Federal Programs
Brad Bylsma, School Improvement Grants

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BACKGROUND

FY 2009 SIG Schools

Tier	Number of SIG-eligible Schools	Number of SIG Schools Funded
Tier I	11	11
Tier II	56	11
Tier III	213	0

FY 2009 SIG Intervention Models

Models	Number of SIG Schools Implementing the Model
Turnaround	7
Transformation	11
Restart	1
Closure	3

FY 2010 SIG Schools

Tier	Number of SIG-eligible Schools	Number of SIG Schools Funded
Tier I	10	9
Tier II	27	0
Tier III	199	0

FY 2010 SIG Intervention Models

Models	Number of SIG Schools Implementing the Model
Turnaround	0
Transformation	9
Restart	0
Closure	0

FY 2011 SIG Schools

Tier	Number of SIG-eligible Schools	Number of SIG Schools Funded
Tier I	1	0
Tier II	29	1
Tier III	209	5

FY 2011 SIG Intervention Models

Models	Number of SIG Schools Implementing the Model
Turnaround	3
Transformation	3
Restart	0
Closure	0

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MONITORING TRIP INFORMATION

Monitoring Visits and Award Amounts

LEA Visited	Denver Public Schools
School Visited	Lake International School and Strive Preparatory School-Lake Campus
Model Implemented	Turnaround and Restart
Total School-Level Funding	\$2,083,232 (for three years) for both schools
Total LEA- level funding (Tier 1 and 2)	FY 2009: \$13,605,229.57 FY 2010: \$1,407,368
LEA Visited	The Joint School District of Adams-Arapahoe 28J (Aurora)
School Visited	The Fulton Academy of Excellence
Model Implemented	Transformation
Total School-Level Funding	\$1,136,100(for three years)
Total LEA-level funding(Tier 1 and 2)	FY 2009: \$n/a FY 2010: \$1, 200, 000
SEA Visited	Colorado Department of Education
FY 2009 SEA SIG Award	\$39,731,239.00 (including \$1,986,561 SEA reservation-\$7,319,601 in ARRA funds)
FY 2010 SEA SIG Award	\$5,933,129.00 (including \$296,656.45 SEA reservation)
FY 2011 SEA SIG Awards	\$5,775,664 (including \$288,783.2 SEA reservation)

Staff Interviewed

- **Colorado Department of Education Staff:** Patrick Chapman, Brad Bylsma, Trish Boland, Wendy Dunaway, Lindsey Dulin
- **Denver Public Schools**
- **Strive Preparatory School Staff:** Principal, Strive Preparatory Schools (CMO) Staff, 3 students, 5 teachers
- **Lake International School Staff:** Principal, Assistant Principal, Instructional Coach, 10 students, 8 teachers, Administrative Assistant
- **The Joint School District of Adams-Arapahoe 28J Staff:**
- **Fulton School of Excellence:** Principal, Leadership Team, 3 students, 3 teachers

U.S. Department of Education Staff

Team Leader	Carlas McCauley
Staff Onsite	Michael Lamb & Molly Scotch

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OVERVIEW OF MONITORING REPORT

The following report is based on the U.S. Department of Education's (ED) onsite monitoring visit to Colorado from September 10 through September 13, 2012 and review of documentation provided by the State educational agency (SEA), local educational agencies (LEAs), and schools. The report consists of two sections: *Technical Assistance Recommendations* and *Monitoring Findings*. The *Technical Assistance Recommendations* section identifies strategies and resources for addressing technical assistance needs. The *Monitoring Findings* section identifies areas where the SEA is not in compliance with the final requirements of the SIG program and indicates required actions that the SEA must take to resolve the findings.

The Department will later issue a *Summary and Observations* addendum that describes the implementation of the SIG program by the SEA, LEAs, and schools visited; initial indicators of success; and any outstanding challenges being faced in implementation. That addendum will focus on how the SEA, LEAs, and schools visited are implementing the SIG program with respect to the following five areas: school climate, teachers and leaders, instructional strategies and time, use of data, and technical assistance.

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TECHNICAL ASSISTANCE RECOMMENDATIONS

This section addresses areas where additional technical assistance may be needed to improve the quality of implementation of the SIG program.

Issue 1: Both LEAs asked for support in identifying strategies for sustaining reform efforts in SIG schools.

Technical Assistance Strategies:

- Provide resources to CDE that support sustainability planning and continued implementation of SIG-funded interventions. (Responsibility: ED)
Develop strategies to assist LEAs in identifying strategies for sustaining reform efforts in SIG schools. (Responsibility: CDE)

Issue 2: Although responsive to LEA and school requests for assistance, the SEA does not appear to enforce or help develop technical assistance strategies at the LEA-level to get at school needs related to SIG program requirements and school turnaround efforts in all of its LEAs. In particular, the LEAs, especially The Joint School District of Adams-Arapahoe-28J, would benefit from targeted assistance from the SEA around strategies for family and community engagement, increased learning time, and systems of rewards, and overall technical assistance plans focused on ensuring fidelity of implementation of all SIG requirements. It is recommended that the SEA broaden existing TA efforts to address these issues as well as other issues related to school turnaround efforts.

Technical Assistance Strategies:

- Provide technical assistance to LEAs on strategies and methods to provide meaningful technical assistance to schools. Once plans are developed, CDE should be regularly monitoring the use of each LEA's plan. (Responsibility: CDE)
- Provide guidance to LEAs on the appropriate and meaningful use of increased learning time. It appears that the LEAs and schools could benefit from additional guidance on what qualifies as extended learning time and how schools can maximize the benefits of extended learning time, including by following ED guidance that effective programs expand learning time by a minimum of 300 hours per school year. (Responsibility: CDE)
- Provide assistance to LEAs on the development of systems that identify and reward school leaders, teachers, and other staff who have increased student achievement. Particularly, where monetary rewards are not possible CDE should guide LEAs to develop systems that reward school leaders, teachers and staff in non-monetary ways. (Responsibility: CDE)

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MONITORING FINDINGS

Summary of Monitoring Indicators

Critical Element	Requirement	Status	Page
1. Application Process	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	
2. Implementation	The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Findings	7-8
3. Fiscal	The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87]	N/A	
4. Technical Assistance	The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	
5. Monitoring	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program.	Findings	8

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	[Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]		
6. Data Collection	The SEA ensures that data are being collected consistent with the final requirements of the SIG program. [Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	

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Monitoring Area: School Improvement Grants Program

Critical Element 2: The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program.

Finding 1: The Colorado Department of Education (CDE) failed to provide sufficient evidence that Fulton Academy of Excellence has implemented a teacher and principal evaluation system that takes into account data on student growth as a significant factor and includes, for appropriate grades, a student's score on the State assessment. The CDE has made progress in working with districts and schools as well as the local teacher association to develop an evaluation system that meets the final requirements for implementation of the transformation model; however, no evaluation system is yet complete.

Citation: Section I.A.2 (d) (1) (B) (1) of the final requirements stipulates, as part of the transformation model, that an LEA must "Use rigorous, transparent, and equitable evaluation systems for teachers and principals that take into account data on student growth (as defined in [the] notice) as a significant factor as well as other factors such as multiple observation-based assessments of performance and ongoing collections of professional practice reflective of student achievement and increased high school graduation rates..." Section I.A.3 (b) (ii) of the final requirements defines student growth as "the change in achievement for an individual student between two or more points in time. For grades in which the state administers summative assessments in reading/language arts and mathematics, a state may also include other measures that are rigorous and comparable across classrooms."

Further action required: The CDE must submit a plan detailing how it will work with help SIG schools and districts to develop and implement a teacher and principal evaluation system that takes into account data on student growth, including student growth data that is based on a student's score on the State assessment under section 1111 (3) of the ESEA. The CDE must submit this to ED within 35 days of receipt of this report. Further, the plan must include a timeline for implementation. The timeline must include an evaluation system that is in place in SIG schools and districts by the end of the 2012-2013 school year. Moreover, the CDE must provide evidence to ED that all schools implementing the transformation model have developed a teacher evaluation system. The evidence must be submitted before making awards with the fiscal year (FY) 2012 SIG funds.

Finding 2: The CDE has not ensured that a system of rewards that is based in part on student achievement is in place at all SIG-awarded schools including at the Fulton Academy of Excellence.

Citation: Section I.A.2.(d)(1)(i)(C) requires that an LEA must identify and reward school leaders, teachers, and other staff who, in implementing this model, have increased student achievement and high school graduation rates and identify and remove those who, after ample

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opportunities have been provided for them to improve their professional practice, have not done so.

Further action required: The CDE must submit to ED evidence that it has reviewed the progress of all schools that received SIG funds to implement the transformation model to ensure that these schools are identifying and rewarding school leaders, teachers, and other staff who, in implementing the transformation model, have increased student achievement. As a part of the evidence, the CDE also must submit to ED the results of that review and for any schools that are not implementing a rewards system the CDE must submit the steps it will take to ensure that all schools receiving SIG funds to implement the transformation model have done so by the start of the 2013-2014 school year. The evidence must be submitted to ED within 35 days of receipt of this report.

Finding 3: At the time of ED's monitoring visit, the Fulton Academy of Excellence failed to meet the requirement of the principal replacement as stated in the SIG final requirements for the Transformation model. Fulton's principal has been leading the school since the 2006-2007 school year. Prior to funding the school, the CDE was aware that Aurora did not intend to replace Fulton's principal. However, prior to making a decision about funding, the CDE allowed the school and LEA to submit evidence as to why the principal was a dynamic leader and should not be replaced as part of the reforms. Subsequently, Fulton was awarded SIG funds and was able to keep its principal as well.

Citation: Section I.A.2(d)(1)(i)(A) of the final requirements stipulate that as part of the transformation model an LEA must replace the principal who led the school prior to the commencement of the transformation model. In approving an LEAs SIG application, Section I.A.4(a)(ii) requires an SEA to consider, at a minimum, the extent the LEAs application demonstrates that the LEA has take, or will take, action to design and implement interventions consistent with the final requirements. *(75 FR 66363 (October 28, 2010))*

Further action required: The CDE must submit to ED evidence that it has reviewed the progress of all schools that received SIG funds to implement the transformation and turnaround model to ensure that principals were hired consistent with the SIG requirement. The CDE also must submit to ED the results of that review and the steps the CDE will take to confirm these schools are either in compliance with the SIG requirements or the steps that will be taken to ensure that all schools will come into compliance with all SIG requirements. The CDE must this plan within 35 days of receipt of this report. As a part of the plan, the CDE must also indicate how it will take this information into account in determining whether to continue the grant for the 2013-2014 school year.

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Critical Element 5: The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program.

Finding: The SEA did not ensure that the LEAs monitor the schools consistent with the final requirements of the SIG program. Although the SEA and the LEAs are providing ongoing technical assistance to the schools in the SIG program, the SEA has not established an expectation, a process, or a timeline for the LEA to monitor these schools.

Citation: Section 80.40 of the Education Department General Administrative Regulations (EDGAR) states that grantees must monitor grant and subgrant activities to ensure compliance with applicable Federal requirements. Section 9304(a) of the ESEA requires that the SEA must ensure that (1) programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications; and (2) the State will use fiscal control and funds accounting procedures that will ensure the proper disbursement of and accounting for Federal funds.

Further action required: The CDE must submit to ED a plan that will ensure that LEAs are monitoring schools implementing SIG. The plan must be submitted to ED within 35 days of receipt of this report.