



UNITED STATES DEPARTMENT OF EDUCATION

JUL 17 2013

The Honorable Terry Holliday
Commissioner of Education
Kentucky Department of Education
Capital Plaza Tower
500 Mero Street
Frankfort, KY 40601

Dear Commissioner Holliday:

During the week of March 25th, a team from the U.S. Department of Education's (ED) Office of School Turnaround (OST) reviewed the Kentucky Department of Education's (KDE) 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 two 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 three sections: (1) *Summary and Observation*, (2) *Technical Assistance Recommendations*, and (3) *Monitoring Findings*. The *Summary and Observations* section 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 KDE 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 KDE 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 is found to have significant compliance findings in one or more of the programs monitored will have a condition placed on the 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.

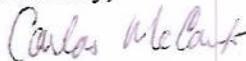
With regards to the *Technical Assistance Recommendations* provided, we encourage you to employ these strategies to further support the effective implementation of the SIG program. ED staff will follow up with your staff over the next few months to see how the KDE is working to address these issues and 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 Kentucky at the time and locations of ED's onsite review. The KDE 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 Donna Tackett and her 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 Kentucky.

Sincerely,



Carlos McCauley
Group Director
Office of School Turnaround

Enclosure

cc: Donna Tackett, Director, Division of Consolidated Plans and Audits

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**Kentucky
Targeted Monitoring Review of
School Improvement Grants (SIG) under section 1003(g) of the
Elementary and Secondary Education Act of 1965
March 25-28, 2013**

SCHOOL IMPROVEMENT GRANTS (SIG) MONITORING REPORT FOR KENTUCKY

BACKGROUND

	Cohort I		Cohort II	
Turnaround	6		7	
Transformation	4		5	
Restart	0		0	
Closure	0		0	
	Number of SIG- eligible Schools	Number of SIG- funded Schools	Number of SIG-eligible Schools	Number of SIG-funded Schools
Tier I	5	5	6	6
Tier II	5	5	6	6
Tier III	98	98	127	0

MONITORING TRIP INFORMATION

Monitoring Visits and Award Amounts	
LEA Visited	Jefferson County Public Schools
School Visited	Frost Middle School
Model Implemented	Turnaround
Funding Awarded	LEA Award to Date (for Cohort 1 and Cohort 2 SIG schools): \$29,249,952 School-level funding: \$1,316,849
LEA Visited	Greenup County School District
School Visited	Greenup County High School
Model Implemented	Transformation
Funding Awarded	LEA Award (for 1 SIG schools): \$1,988,740 Greenup County High School funding: \$1,988,740
SEA Visited	Kentucky Department of Education
Total FY 2009 SEA SIG Allocation	\$55,927,486
Total FY 2010 SEA SIG Allocation	\$8,659,171
Total FY 2011 SEA SIG Allocation	\$8,436,863
Total FY 2012 SEA SIG Allocation	\$7,737,227

Allocation	
Staff Interviewed	
<ul style="list-style-type: none"> ➤ Kentucky Department of Education Staff: Donna Tackett, David Millanti, Susan Allred, Jason Radford, Thelma Hawkins, Helen Jones, Charlie Harman and Troy McGinnis ➤ Jefferson County Public Schools Staff: Asst. Superintendent for Area 1, 2 and 4, Evaluation and Transition Coordinator, Director of Planning, Program Evaluation Specialist, Fiscal Coordinator ➤ Frost Middle School Staff: Principal, School Leadership Team, 6 Teachers, 1 Parent, Students, and 5 Classroom Visits ➤ Greenup County School District Staff: Chief Information Officer, Director of Compliance ➤ Greenup County High School Staff: Principal, School Leadership Team, 3 Teachers, 5 Parents, Students, and 4 Classroom Visits 	
U.S. Department of Education Staff	
Group Leader	Carlas McCauley
Staff Onsite	Christopher Tate and Janine Rudder

OVERVIEW OF MONITORING PROCESS

The following report is based on the U.S. Department of Education’s (ED) on-site monitoring visit to Kentucky from March 25-28, 2013 and review of documentation provided by the State educational agency (SEA), local educational agencies (LEAs), and schools. The report consists of the sections described below.

The observations and descriptions illustrate 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.

The *SIG Monitoring Report* provides feedback to the Kentucky Department of Education (KDE) on its implementation progress, and in a manner that is consistent with the School Improvement Grant (SIG) final requirements of SIG authorized by Section 1003(g) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended, and as explained further in *Guidance on Fiscal Year 2010 School Improvement Grants Under Section 1003(g) of the Elementary and Secondary Education Act of 1965 March 2012*. The report consists of the following sections:

- *Background Information.* This section highlights significant achievements in the SEA’s implementation of the SIG grant. This section also includes a brief overview of the KDE’s structure and vision for the SIG implementation.
- *Summary of the Kentucky Department of Education’s Implementation of SIG Critical Elements.* This section provides a summary of the SEA’s progress in implementing SIG and is based on evidence gathered during the monitoring visit on March 25-28, 2013 or through written documentation provided to ED.
- *Technical Assistance Recommendations.* This section addresses areas where additional technical assistance may be needed to improve the quality of SIG program implementation.

- *Monitoring Findings.* This 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.

BACKGROUND INFORMATION

Highlights of KDE's Implementation of SIG

- Frost Middle School's (Frost Middle) math department has focused on increasing the rigor of math instruction by implementing an approach that promotes the use of analytical skills as opposed to drills and memorization. Math teachers are using an inquiry-based system, which is referred to as an "investigative approach." Critical thinking skills are inherent in this technique because it requires students to consistently ask and respond to higher order thinking questions throughout the problem solving process.
- The Greenup County High School (Greenup) math department has modified its math curriculum and course offerings to differentiate instruction to students based on individual student progress. Using the dynamic math model, Greenup's math department tailored curriculum maps aligned to KY math standards. The model facilitated deconstructing Algebra 1, Algebra 2 and Geometry courses; while, integrating these concepts across courses, which made the content of those classes more accessible to students.

KDE Structure and Vision

The Kentucky Department of Education, under the leadership of Commissioner Terry Holliday, uses the statewide system of support designed and implemented under SIG to inform the State's work with other non-SIG low-performing and Priority schools. The State utilizes Education Recovery Leaders (ERLs) and Education Recovery Specialists (ERSs) located across Kentucky to provide targeted assistance in implementing interventions and guiding turnaround at the district and school level as well as Education Recovery Directors (ERDs) that oversee the work of the ERLs and ERSs in each region, monitor the school plans for effectiveness and provide support through leadership.

SUMMARY OF THE KENTUCKY DEPARTMENT OF EDUCATION'S IMPLEMENTATION OF SIG CRITICAL ELEMENTS

Application Process

The KDE made cohort I and cohort II awards to LEAs as outlined in its approved SIG applications.

In the SEA interview, the KDE staff reported that it notified LEAs with SIG-eligible schools and provided technical assistance throughout the application process by conducting webinars and providing individualized support based on the needs of the district. In interviews, LEA staff stated that the KDE's recovery staff provided technical assistance throughout the application process by hosting a briefing for eligible LEAs on what it means to be a SIG school, providing a template for the SIG application and offering feedback on various portions of the application such as the budget.

Since awarding the grants, the KDE has received budgetary amendments to school applications for review and approval. Frost Middle School leadership submitted an amendment to its application to provide additional professional development to school staff and it was approved. Both the school and district spoke to the rigorous review and technical assistance provided by the KDE when requesting an amendment.

Implementation

Jefferson County Public Schools; Frost Middle School

JCPS identified lack of progress in student achievement in reading and math, the absence of job-embedded professional development, and the inability to use of data to inform instruction and promote achievement as major areas of concern in the needs assessment for Frost Middle.

In its application, Frost Middle indicated that it would improve student achievement in reading and math by increasing the rigor of instruction and aligning instruction to the Kentucky Program of Studies and Core Content Assessment. Employing mathematics and reading specialists from the district and the State to work with teachers, the school planned to implement common planning periods and Professional Learning Communities (PLCs) focused on improving the instructional skills of teachers. The school leadership team reported that the initial plan for implementing the turnaround model as outlined in the school's application focused on the school being resource rich with a focus on developing strong instruction that would benefit students academically. Presently, the staff feels that as a result of restructuring within the district, the resources necessary to continue to support student academic improvement are not readily available or easily to accessible. The Central Office has moved toward requiring specific academic programs but expectations are not clearly communicated to schools around curriculum, instruction and assessment. It was reported during interviews that it was unclear what it means to be a SIG school in JCPS in terms of resource allocation and instructional support.

The school also, as stated in its approved application, sought to improve instruction and raise student achievement by implementing a new structure for job-embedded professional development. Staff in the building, as outlined in the application, would be trained in the use of formative and summative assessments and using data to improve instruction. Newly hired staff would be required to demonstrate a willingness to employ technology in teaching strategies and demonstrate rigor in designing and implementing quality instruction that incorporates feedback from observations and data as a result of professional development. In interviews, the staff stated that initially job-embedded professional development was strong and there were numerous opportunities; however, during the 2012-2013 school year the opportunities were fewer. Also, the staff reported in the 2011-2012 school year that JCPS did a great job conducting professional development on preparing for the Common Core by subject/grade level. Staff perception was that those resources are no longer available and they requested that the district go back to the previous support structure.

In addition to addressing the major areas of concern in the needs assessment, Frost Middle hired a new principal for the first year of SIG implementation and screened and replaced more than 50% of the staff; however, it was not evident how locally adopted competencies were identified through the hiring process. The school also used data to inform and differentiate instruction.

In interviews, the school leadership team and teachers indicated that Frost Middle implemented but struggled with providing on-going, job-embedded professional development for staff. Also, the school leadership and teachers stated that since implementing the SIG program the school has provided social-emotional and community-oriented services but could use assistance in this area.

The school did not increase learning time consistent with the final requirements of the SIG program.

Greenup County School District/Greenup County High School

Greenup County School District identified low student proficiency in reading and mathematics, the lack of data used to determine instructional need and align supports, and poor professional development as major areas of concern in the high school's needs assessment.

In its application, Greenup indicated that it would increase student proficiency in reading and mathematics by providing additional instructional periods for mathematics and reading. The school strived to better align the curriculum to State standards by employing the services of ERSs to support instructional development in these content areas. The school also contracted with a professor at Eastern Kentucky University to implement a mathematics program that focuses on automaticity. In interviews, school and district staff stated that the implementation of the Measures of Academic Progress program has been instrumental to improving student academic skills and differentiating instruction to ensure students' academic needs are met through targeted interventions. The push to embed literacy lessons in all coursework, as well as increase the focus on research based, reading professional development, has been reported as instrumental in improving the reading skills of students. Further, the mathematics program coupled with the provider's instructional support is showing that students are making academic gains in math.

To improve professional development, the high school planned to work with State ERSs to embed professional development by establishing PLCs and increasing opportunities for teachers to further develop skills offsite at conferences and through continuing education opportunities. The staff interviewed felt that the goals of professional development are clearly articulated and allow for each teacher to develop their capacities to meet the individual academic needs of students. Also, the development of the PLCs has lessened the feeling of isolation by allowing for greater collaboration and sharing of instructional strategies across the building.

Finally, to improve the rigor of instruction, Greenup planned to implement the use of data and implement a process for ongoing process improvement to support reform implementation. The school's leadership team expressed that by using qualitative and quantitative data the team can develop clear 30/60/90 day action plans and determine ongoing success toward meeting those goals. Student achievement data is used primarily to evaluate program performance and not teacher/leader performance. The leadership team uses this data to identify and support teaching gaps and reassign teachers for the purpose of aligning their skills to students' needs.

In addition to addressing the major areas of concern in the needs assessment, the LEA hired a new principal for the first year of SIG implementation, provided opportunities for family and community engagement, and implemented strategies to recruit, place, and retain staff.

In interviews, the district and school staff indicated that the high school implemented, but struggled with, instituting a system of rewards for staff that have increased student achievement.

The school did not implement increased learning time and did not implement a teacher and leader evaluation system consistent with the final requirements of SIG.

Fiscal

The KDE reserves five percent of the State's SIG allocation and uses its reservation for providing specialists to the first cohort of SIG schools and general administrative costs.

The KDE ensures that SIG funds are spent on allowable activities through a system of amendment reviews and approval for each SIG school. As a part of the review, the KDE employs ERD staff to assist with reviewing requests at the local level before an LEA submits the requested amendment to the State. The State then conducts quarterly spending reviews of district expenditures through a State fiscal accountability system. For those costs determined to be unallowable, the State will require districts to cover the expense.

To ensure that its LEAs adhere to proper accounting of time and attendance for staff paid with SIG funds and maintain equipment and materials purchased with SIG funds, the KDE includes compliance checks for these items as a part of their standard monitoring procedure.

Technical Assistance

Kentucky Department of Education

During interviews, the KDE stated that it is providing technical assistance to support LEAs with implementing SIG through the formation of District 180, a division charged with providing oversight and technical assistance to SIG schools and districts. District 180 consists of Education Recovery staff hired to provide ongoing support in the form of coaching for principals as well as content specific professional development for teachers. The KDE also partners with the Appalachian Regional Commission (ARC) and the Regional Educational Laboratory (REL) to compile best practices in rural schools and examples of increased learning time.

LEA leadership stated that the KDE support for SIG implementation has been beneficial. District staff reported that technical assistance from the State is conducted through the Education Recovery Staff. A district staff member described the role of the ERL as "the bridge between the school and the district" and spoke appreciatively about the district level coaching built into that role. The content specific support provided by the ERSs has led to professional learning communities in SIG schools that one LEA plans to replicate in schools across the district. LEA staff identified additional coaching for turnaround principals and frameworks for sustaining interventions as areas in which the State could receive additional technical assistance.

Jefferson County Public Schools

In its application, JCPS proposed assigning resource teachers to each SIG school to support implementation through providing individualized instructional coaching and professional development to teachers as well as assessing implementation progress. In some cases, the district also stated that it would assign a Priority Schools Manager to schools to coach and provide

administrative supports to the principal. JCPS also proposed other specialized supports, such as literacy specialists, based on the school's needs assessment.

In interviews, Frost Middle School staff stated that the technical assistance it receives from the JCPS has diminished drastically from the first year of SIG implementation as a result of district restructuring of services to all schools. The school's administration stated, as did the LEA, that the primary form of technical support the district offers is in the form of one resource teacher. For the 2012-2013 school year, the expertise of resource person assigned to Frost Middle is not in the content area of greatest need. Teachers stated that this approach limits the opportunities for teachers to get content specific assistance in instruction. The staff and school leadership team expressed during interviews that the district's single school resource person was not the right approach for a turnaround school. Staff explained that since students enter the school with such acute reading and math deficits, a resource teacher with a background in one of those areas would be more helpful. School staff also expressed uncertainty about the process for requesting additional resources from the district.

JCPS staff stated that additional resources are available to the staff at Frost Middle School; however, due to poor communication with the district after the restructuring, the staff is not clear about how to access additional resources.

Greenup County School District

In its application, the LEA proposed to support Greenup by administering and overseeing specific SIG related functions such as instructional programs and student services so that the district is involved in all SIG related activities.

In interviews, Greenup staff described the technical assistance it receives from the LEA as useful. The school administration stated that the district has provided support through academic resources, opportunities to attend professional development workshops outside of the district as well as connections to other district networks. GCSD staff also attends weekly school turnaround team meetings and provides feedback to Greenup to support full and effective implementation of the SIG program.

Monitoring

The KDE's plan for monitoring the implementation of the SIG program stated that the ERD staff would conduct monitoring activities such as site visits, collect supporting data on schools' SIG plans and work in tandem with schools to revise plans based on implementation progress. Education Recovery District (ERD) staff work closely with SIG school staff and are in schools daily. KDE staff conducts annual onsite monitoring visits and ERDs meet twice monthly with district superintendents to review quarterly progress reports submitted by the district.

The KDE has implemented its monitoring plan as outlined in its approved SIG applications and has added the review of monthly expenditure reports.

Data Collection /Use of Data

The KDE uses its system to collect data on SIG achievement and leading indicators from LEAs and schools. LEAs submit data to the SEA on a quarterly basis. The quarterly report has

comprehensive targets for each school and is used for goal-setting by school leadership in collaboration with ERD staff.

In addition to the required data indicators, the KDE is also collecting data on specific interventions and ACT scores. The State is “data rich.”

The KDE uses the data it collects to inform targeted assistance to its SIG schools on meeting the three primary SIG goals identified by each school. ERD staff disaggregates the data to measure each school’s progress toward meeting its individual 30/60/90 day goals (smaller, more manageable goals embedded within each school’s more comprehensive plan).

According to EDFacts records, the KDE had not submitted all required achievement and leading indicator data to the ED at the time of the monitoring event; however, as of July 11, 2013 all of the required data was reported to ED.

TECHNICAL ASSISTANCE RECOMMENDATIONS

Implementation (Instructional Programs): The population of students in need of special education services at Frost Middle School has doubled to approximately 20% over the last year. Tailoring instruction to meet these students' needs has been a challenge. Although the school has been assigned five and a half special educators, they are struggling with implementing a co-teaching model in a way most effective to meet student needs.

Technical Assistance Strategies:

- Connect JCPS to other SEAs with promising co-teaching practices (Responsibility: ED).
- Provide targeted technical assistance to both content specific and special education teachers on how to co-plan and co-lead lessons (Responsibility: JCPS).
- Ensure that schedules align to allow for content and special education teachers to plan together (Frost Middle School).

Implementation (Sustainability): The GCSD requested additional technical assistance on sustaining turnaround reforms. Specifically, the district seeks assistance in developing processes to identify staff positions and to continue aligned programs and strategies for the purpose of continuing transformation when the grant ends.

Technical Assistance Strategies:

- Provide the KDE resources on effective strategies for sustaining activities and interventions implemented through the SIG program (Responsibility: ED).
- Provide focused technical assistance to LEAs on strategies and methods to sustain interventions implemented through the SIG program, such as:
 - Conducting a comprehensive review of programmatic activities; and,
 - Providing information regarding options for SEA support and additional resources to LEAs to continue turnaround activities after SIG funds are no longer available (Responsibility: KDE).
- Identify resources and strategies to sustain transformation in SIG schools and adopt a comprehensive plan for continued school turnaround upon exiting the SIG program (Responsibility: LEA)

Implementation (Resource Access): As a result of restructuring within JCPS the resources necessary to continue to support student academic improvement are not readily available or easy to access by SIG school staff.

Technical Assistance Strategies:

- Provide focused technical assistance to JCPS on strategies and methods for supporting SIG implementation through a targeted approach as outlined in the district's approved application (Responsibility: KDE).
- Ensure that SIG schools within the district understand and are easily able to access the resources necessary to fully and effectively implement the turnaround strategies identified in their approved applications (Responsibility: LEA).

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))]	None	
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))]	Finding(s)	12-13
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]	None	
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))]	None	
5. Monitoring	The SEA ensures that monitoring of LEAs and schools is being conducted 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	None	

	(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))]	None	

Monitoring Area: School Improvement Grant

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

Finding: While interventions such as additional instruction in core content areas and common planning periods are in place, the KDE has not ensured that JCPS and GCSD have increased learning time consistent with the final requirements of the SIG program.

Citation: Section I.A.2 (a)(1)(viii) of the final requirements states that an LEA implementing the SIG program must “establish schedules and implement strategies that provide increased learning time.” Section I.A.3 of the final requirements defines *increased learning time* as “using a longer school day, week, or year schedule to significantly increase the total number of school hours to include additional time for (a) instruction in core academic subjects including English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography; (b) instruction in other subjects and enrichment activities that contribute to a well-rounded education, including, for example, physical education, service learning, and experiential and work-based learning opportunities that are provided by partnering, as appropriate, with other organizations; and, (c) teachers to collaborate, plan, and engage in professional development within and across grades and subjects.” (75 FR 66363 (October 28, 2010)).

Further action required: The KDE must submit evidence to ED that it has reviewed all LEAs implementing the transformation or turnaround model to determine that increased learning time is being implemented per the SIG requirements. The KDE must also submit to ED a timeline and plan outlining how it will work with LEAs that are not implementing increased learning time to become compliant. Should the KDE determine through its review that an LEA does not have the capacity to implement this requirement, the KDE must submit to ED, prior to the 2013-2014 school year, the steps it will take to bring the LEA into compliance.

Finding: The KDE’s evaluation system does not include student achievement data as a part of teacher and leader evaluations consistent with the final requirements of the SIG program. The State promotes the use of student achievement data through crucial conversations between teachers and leaders. Each teacher has a growth plan and data is used to identify areas of needed growth.

Citation: Section § I.A.2.(d)(1)(i)(B) 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)), requires a State to “use rigorous, transparent, and equitable evaluation systems for teachers and principals that (a) take into account data on student growth 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; and, (b) are designed and developed with teacher and principal involvement.”

Further action required: The KDE must submit to ED evidence that it has reviewed all LEAs implementing the transformation model to determine if the principal and teacher evaluation

system is being implemented consistent with the final requirements of the SIG program. The KDE must then work with those LEAs that the State determines do not meet this requirement to ensure full compliance at the start of the 2013-2014 school year. In the event that the KDE determines that any LEA lacks the capacity to fully implement a teacher and leader evaluation system that uses student growth for evaluating performance at the start of the 2013-2014 school year, the KDE must submit to ED its plan to address this compliance issue.

Finding: The KDE has not ensured that all staff hired at JCPS as a part of the turnaround process were screened or selected using locally adopted competencies. The district failed to demonstrate that it identified specific competencies when recruiting and hiring new staff for Frost Middle School.

Citation: Section I.A.2(a)(1)(ii) of the final requirements stipulate that as part of the turnaround model an LEA must be “(ii) using locally adopted competencies to measure the effectiveness of staff who work within the turnaround environment to meet the needs of students (A) Screen all existing staff and rehire no more than 50 percent; and (B) Select new staff.” (75 FR 66363 (October 28, 2010))

Further action required: The KDE will develop and submit to ED a plan for how it will ensure that an LEA funded in the FY 2013 competition to implement the turnaround model uses locally adopted competencies in its process for recruiting and hiring staff.