

School Improvement Grants Application

Section 1003(g) of the Elementary and Secondary Education Act

CFDA Numbers: 84.377A; 84.388A



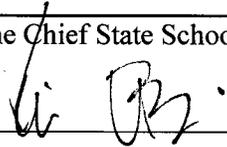
U.S. Department of Education
Washington, D.C. 20202

OMB Number: 1810-0682
Expiration Date: 06/30/2010

Paperwork Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810-0682. The time required to complete this information collection is estimated to average 100 hours per response, including the time to review instructions, search existing data resources, gather the data needed, and complete and review the information collection. If you have any comments concerning the accuracy of the time estimate or suggestions for improving this form, please write to: U.S. Department of Education, Washington, D.C. 20202-4537.

APPLICATION COVER SHEET
SCHOOL IMPROVEMENT GRANTS

<p>Legal Name of Applicant: DC Office of the State Superintendent of Education</p>	<p>Applicant's Mailing Address: 810 1st Street, NE Washington, DC 20002</p>
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<p>Signature of the Chief State School Officer: X </p>	<p>Date: 03-17-10</p>
<p>The State, through its authorized representative, agrees to comply with all requirements applicable to the School Improvement Grants program, including the assurances contained herein and the conditions that apply to any waivers that the State receives through this application.</p>	

PART I: SEA REQUIREMENTS

As part of its application for a School Improvement Grant under section 1003(g) of the ESEA, an SEA must provide the following information.

A. ELIGIBLE SCHOOLS: An SEA must provide a list, by LEA, of each Tier I, Tier II, and Tier III school in the State. (A State’s Tier I and Tier II schools are its persistently lowest-achieving schools and, if the SEA so chooses, certain additional Title I eligible schools that are as low achieving as the State’s persistently lowest-achieving schools or that have had a graduation rate below 60 percent over a number of years.) In providing its list of schools, the SEA must indicate whether a school has been identified as a Tier I or Tier II school solely because it has had a graduation rate below 60 percent over a number of years. In addition, the SEA must indicate whether it has exercised the option to identify as a Tier I, Tier II, or Tier III school a school that was made newly eligible to receive SIG funds by the Consolidated Appropriations Act, 2010.

Along with its list of Tier I, Tier II, and Tier III schools, the SEA must provide the definition that it used to develop this list of schools. If the SEA’s definition of persistently lowest-achieving schools that it makes publicly available on its Web site is identical to the definition that it used to develop its list of Tier I, Tier II, and Tier III schools, it may provide a link to the page on its Web site where that definition is posted rather than providing the complete definition.

The District of Columbia used the persistently lowest-achieving schools definition to develop its list of Tier I, Tier II, and Tier III schools. Because the page on OSSE’s website is being updated to reflect recent changes to the definition in response to feedback on the SFSF Phase II application from the U.S. Department of Education, this definition is provided here as Attachment A.

OSSE does not intend to identify any newly eligible schools.

As shown in Attachment B, a list by LEA of all 1003(g)-eligible schools, DC has 10 Tier I schools and no Tier II schools; 9 of the 10 Tier I schools are within one LEA – District of Columbia Public Schools. OSSE anticipates that, once all (or most) of the District’s 10 Tier I schools are served, there will be no additional funds available for LEAs to serve any Tier III schools. Therefore, OSSE will administer a two-phase application process, as described in further detail in Section D below. In Phase I, applications will be accepted only for plans to serve Tier I schools (meaning only from 2 LEAs). If funds are available after Phase I awards, all LEAs with Tier III schools will be invited to apply for funds in Phase II. The LEA application for Phase II will be mostly identical to that for Phase I, with references to “the selected intervention” changed to “school improvement activities.”

<u>LEA NAME, NCES ID #</u>						
SCHOOL NAME	NCES ID #	TIER I	TIER II	TIER III	GRAD RATE	NEWLY ELIGIBLE*

* As noted above, an SEA must identify newly eligible schools on its list only if it chooses to take advantage of this option.

B. EVALUATION CRITERIA: An SEA must provide the criteria it will use to evaluate the information set forth below in an LEA's application for a School Improvement Grant.

Part 1

The three actions listed in Part 1 are ones that an LEA must take prior to submitting its application for a School Improvement Grant. Accordingly, the SEA must describe, with specificity, the criteria the SEA will use to evaluate an LEA's application with respect to each of the following actions:

- (1) The LEA has analyzed the needs of each Tier I and Tier II school identified in the LEA's application and has selected an intervention for each school.

OSSE will evaluate an LEA application with respect to the needs analysis and intervention selection through three application requirements (see Part 1 of "A" tabs in Attachment C), which the LEA will have to complete for each school it proposes to serve. For each Tier I school the LEA proposes to serve, the LEA will be required to perform a standard needs assessment and analysis. The tool, which all LEAs must use, is based on the "Nine Characteristics of High Performing Schools," first developed by the Washington State Education Agency. Then, in the application, the LEA must, for each school:

- **Indicate the dates during which this needs assessment and analysis took place,**
- **Complete a chart showing the results in the nine general categories of the needs assessment, and**
- **Assure that a copy of the needs assessment and all related documentation will be made available to OSSE for review upon request.**

The LEA will also provide a narrative "Summary of Needs Identified Through LEA Analysis" and indicate which of the four required interventions it proposes to implement in the school.

During OSSE review of the LEA's application, OSSE staff will ensure that, for each Tier I school the LEA proposes to serve:

- 1. The LEA provided dates for the needs assessment and analysis;**
- 2. The LEA listed the general-category results of that analysis in the chart provided;**
- 3. The LEA summarized the needs it identified;**
- 4. The LEA indicated which intervention it proposes to implement; and**
- 5. The selected intervention aligns with the results of the needs assessment and analysis, as described through the chart and the narrative summary.**

- (2) The LEA has demonstrated that it has the capacity to use school improvement funds to provide adequate resources and related support to each Tier I and Tier II school identified in the LEA's application in order to implement fully and effectively the selected intervention in each of those schools.

For each Tier I school to be served, an LEA must provide a narrative response which describes the elements of capacity it believes will make full and effective implementation of the selected intervention possible (see Part 5.1 of "A" tabs in Attachment C). The LEA application narrative will be guided by OSSE's Review Rubric, which will be provided within the LEA application (see Attachment D).

Consistent with the U.S. Department of Education’s non-regulatory guidance, OSSE will also direct LEAs to include in this statement, as applicable, such information as number and credentials of staff dedicated to intervention implementation; amount of other funds to be dedicated to implementing the intervention; ability to recruit new principals for the turnaround and transformation models or the availability of EMOs to enlist for the restart model; and lack of barriers and/or evidence of support from teachers, the board of education, school staff, and/or parents. Based on the Review Rubric, OSSE reviewers will rate the narrative response as “not acceptable,” “conditionally acceptable” (acceptable only after necessary revisions), or “fully acceptable.”

Also, the LEA must provide an action plan for the proposed implementation (see Part 3 of “A” tabs in Attachment C). This plan will list action steps containing specific dates and the person/s responsible for each action step. OSSE reviewers will validate that all of the timelines demonstrate that the LEA has the ability to get the basic elements of its selected model/s up and running by the beginning of the 2010-2011 school year in every school in the application.

- (3) The LEA’s budget includes sufficient funds to implement the selected intervention fully and effectively in each Tier I and Tier II school identified in the LEA’s application as well as to support school improvement activities in Tier III schools throughout the period of availability of those funds (taking into account any waiver extending that period received by either the SEA or the LEA).

During both LEA application phases, each LEA applicant must provide a separate budget for each of the three years of the period of availability (provided the waiver to extend the period of availability is granted) for each of the Tier I schools (in Phase I) or Tier III schools (in Phase II) it proposes to serve with school improvement funds (see “C” tabs in Attachment C). In its descriptions of activities to be funded, the LEA will distinguish between activities to be implemented by the school and services to be provided by the LEA.

Furthermore, the LEA will provide a narrative statement for each school to be served to explain how the total amount of funds included in the budget will be sufficient to fully and effectively implement the selected intervention/s in each Tier I school identified to be served in Phase I and to support school improvement activities in each Tier III school in Phase II (see Part 5.2 in “A” tabs in Attachment C). If the amount budgeted for one year in which the LEA will implement the turnaround model, the restart model, or the transformation model in a Tier I school is less than \$500,000, OSSE reviewers will closely scrutinize the response to ensure that a lesser amount will be sufficient to support full and effective implementation of that intervention.

Finally, the LEA is also asked to provide details on total other funds expected to be dedicated to supporting the intervention, including local funds, Title I funds, school improvement funds reserved under Section 1003(a) of the ESEA, or funds from other sources (see Part 5.3 in “A” tabs in Attachment C).

During its review of the LEA's application, OSSE must find that, taken as a whole, the budgets and statements provided by the LEA support the LEA's contention that the total budget includes sufficient funds.

Part 2

The actions in Part 2 are ones that an LEA may have taken, in whole or in part, prior to submitting its application for a School Improvement Grant but, most likely, will take after receiving a School Improvement Grant. Accordingly, an SEA must describe how it will assess the LEA's commitment to do the following:

- (1) Design and implement interventions consistent with the final requirements.
- (2) Recruit, screen, and select external providers, if applicable, to ensure their quality.
- (3) Align other resources with the interventions.
- (4) Modify its practices or policies, if necessary, to enable it to implement the interventions fully and effectively.
- (5) Sustain the reforms after the funding period ends.

To gather information to show an LEA's commitment to complete each of these actions, OSSE will require the LEA to provide five action plans in its application (see Part 2 of tab 6 of Attachment C). For each of these five actions, regardless of whether the respective action is begun prior to applying or will begin only after applying, the LEA must provide a list of action steps. For each action step, the LEA will provide beginning and ending dates, a description, and the name/s of the person/s responsible for completing the action step. To ensure the LEA has the opportunity to fully demonstrate its commitment to take each action, the LEA will also provide a narrative statement to demonstrate the commitment.

OSSE reviewers will rate the LEA's combined action plan and narrative for each of these 5 actions as "not acceptable," "conditionally acceptable," or "fully acceptable." In doing so for Tier I schools (in Phase I), reviewers will consider whether the timelines allow the LEA to get the basic elements of its selected model/s up and running by the beginning of the 2010-2011 school year in every school in the application.

C. CAPACITY: The SEA must explain how it will evaluate whether an LEA lacks capacity to implement a school intervention model in each Tier I school.

An LEA that applies for a School Improvement Grant must serve each of its Tier I schools using one of the four school intervention models unless the LEA demonstrates that it lacks sufficient capacity to do so. If an LEA claims it lacks sufficient capacity to serve each Tier I school, the SEA must evaluate the sufficiency of the LEA's claim. Claims of lack of capacity should be scrutinized carefully to ensure that LEAs effectively intervene in as many of their Tier I schools as possible.

The SEA must explain how it will evaluate whether an LEA lacks capacity to implement a school intervention model in each Tier I school. The SEA must also explain what it will do if it determines that an LEA has more capacity than the LEA demonstrates.

First, again, there are two LEAs in the District with Tier I schools – 9 within the District of Columbia Public Schools with the other being Options Public Charter School. In its Phase I application, if either of the two LEAs with at least one Tier I school proposes to serve fewer than all of its Tier I schools, using one of the four intervention models, the LEA must provide a statement describing how it lacks sufficient capacity to do so (see Part 1 of tab 6 of Attachment C). The statement must refer to specific elements of capacity the LEA believes make the LEA unable to fully and effectively implement an intervention in all Tier I schools. Consistent with the U.S. Department of Education's non-regulatory guidance, OSSE will direct LEAs to include in this statement information that relates to, among other things, the number and credentials of staff dedicated to intervention implementation; amount of other funds to be dedicated to implementing the intervention; in/ability to recruit new principals for the turnaround and transformation models or the un/availability of EMOs to enlist for the restart model; and barriers and/or evidence of support or lack of support from teachers, the board of education, school staff, and/or parents.

Additionally, in order to provide the required close scrutiny if either of these LEAs indicate a lack of capacity, OSSE will require a personalized follow-up meeting between OSSE's Title I director and relevant LEA staff during which OSSE will gather additional information and detail. In this meeting, OSSE will ensure that the LEA has considered all elements of capacity and each of the four allowable interventions (including school closure) and also consider whether any claimed lack of capacity could be resolved through technical assistance or other support provided by OSSE.

If OSSE determines that, despite its claim, the LEA does indeed have the capacity to implement an intervention in every Tier I school, OSSE will require the LEA to serve all Tier I schools in order to receive any 1003(g) funds and will require the LEA to amend its application to include plans for the Tier I school/s it originally did not include. Additionally, OSSE will require the LEA to address how it will ensure it leverages its full capacity in the statement it will then have to provide in the application demonstrating that it *does* have the capacity to serve all Tier I schools (or at least all of those that OSSE determines it has the capacity to serve, if it is not all Tier I schools).

D. DESCRIPTIVE INFORMATION: An SEA must include the information set forth below.

(1) Describe the SEA's process and timeline for approving LEA applications.

As noted briefly in Section A above, OSSE anticipates that awards for its 10 Tier I schools, presuming approval of the requested waiver extending the period of availability (see Section H), will likely exhaust the full amount available in School Improvement Grants to LEAs. The total amount available for subgrants to LEAs – 95% of the District of Columbia's combined allocation for School Improvement Grants – is approximately \$11.9 million. With the waiver mentioned above, awards will be required to be apportioned in a way to allow for two annual award renewals, meaning annual awards for Tier I schools could average less than \$500,000 per school. Given that an LEA can actually request up to \$2 million per school, it is likely no funds will be available to serve any Tier III schools.

Knowing this, and in order to avoid wasted time and effort by as many as 30 LEAs that have only Tier III eligible schools, OSSE will implement a two-phase LEA application process. In Phase I, only LEAs with Tier I schools will be invited to apply only for funds to implement interventions in their Tier I or Tier I schools. If, after awarding funds to those LEAs based on their Phase I applications, additional funds are available for serving additional schools this year, OSSE will invite all 31 LEAs with Tier III schools to apply for awards to serve one or more of their Tier III schools in a Phase II application process, using the same application as was used for Phase I, except for changing all references to "the selection intervention" to "school improvement activities." To ensure maximum transparency for LEAs in a Phase II application process, OSSE will announce the total amount of funds available and will require a "Notice of Intent to Apply to Serve Tier III School/s" as the first step in the application process. The list of LEAs intending to apply will be published on OSSE's website.

The SIG timeline depends on when OSSE receives approval from ED. Phase I applications will be released, depending on the date OSSE receives ED approval, between 03-01-10 and 03-15-10. These applications will be due to OSSE approximately six weeks after they are released, between 04-09-10 and 04-23-10. Grant Award Notifications (GANs) based on Phase I applications for serving Tier I schools will be provided between 04-30-10 and 05-14-10. If necessary, Phase II applications will be released the same day GANs for Phase I are provided. Phase II applications will then be due to OSSE between 05-28-10 and 06-11-10 for a release date for GANs for serving Tier III schools between 06-11-10 and 06-25-10.

Phase I applications (from two eligible LEAs) will be reviewed by the School Improvement Grants coordinator, the director of the Title I program, and the most senior Title I program analyst. OSSE's Review Rubric defining "not acceptable," "conditionally acceptable," and "fully acceptable" responses for each part of the application will be used by all reviewers. For each school, the request will receive a rubric score between 0 and 100. For any score below 75, the application will be rejected as "not acceptable" overall. For any score between 76 and 99, the request will be deemed "conditionally acceptable" and the LEA will have two weeks to refine those responses in order to make them "fully acceptable" during the review process. A score of 100 is necessary to receive funding, as that score indicates fully acceptable responses for all elements of the application (meeting all requirements).

If it is necessary to implement Phase II, those applications (from up to 31 eligible LEAs) will be reviewed by three Title I staff members. The same rubric with appropriate adjustments given different requirements for Tier III schools will be used for their review of these applications. Again, LEAs with “conditionally acceptable” responses will have an opportunity during the 2-week review process to refine those responses in order to make them “fully acceptable.”

- (2) Describe the SEA’s process for reviewing an LEA’s annual goals for student achievement for its Tier I and Tier II schools and how the SEA will determine whether to renew an LEA’s School Improvement Grant with respect to one or more Tier I or Tier II schools in the LEA that are not meeting those goals and making progress on the leading indicators in section III of the final requirements.

The LEA will be required to provide proposed annual goals for each school in its application (see Part 2 of “A” tabs in Attachment C). OSSE will review the proposed annual goals to ensure that the LEA established rigorous, yet obtainable goals. OSSE will determine whether the goals align with the examples in Section H-25 of ED’s non-regulatory guidance.

Any LEA that receives a School Improvement Grant will be required to submit data on the leading indicators listed in the Department’s final regulations and the LEA application to OSSE for each school year during which it receives an initial or renewed School Improvement Grant. Additionally, the LEA will be required to submit a report on the progress of the school improvement intervention implementation.

OSSE’s determination of whether to renew an award for a school will take into consideration the following three data sources:

- DC-CAS results (student assessment data),
- Data on the leading indicators, and
- The school-specific report on the progress of intervention implementation.

First, student assessment data (DC-CAS results) will be compared with the annual goals provided in the LEA application. OSSE will determine whether a school “made significant progress,” “made some progress,” or “made little or no progress.” For a school to have made significant progress, annual goals in both reading/language arts and mathematics must be met. Second, OSSE will determine whether, on the leading indicators, a school “made significant progress,” “made some progress,” or “made little or no progress.” Finally, from the implementation report and any data gathered through on-site and/or other monitoring, OSSE will determine whether, toward full implementation of the intervention, a school “made significant progress,” “made some progress,” or “made little or no progress.”

For an LEA to receive award renewal for a school, the school must have (1) made “significant” progress in at least one area or (2) have made “some” progress in at least two areas. Consistent with the final requirements, any school that met its annual achievement goals will meet these criteria. For schools that did not make significant progress in any area and made little or no progress in two or more areas, the LEA will not receive funds toward a renewal award. LEAs will be required to consider and report on plans for adjustment to the original plan for any school that did not meet annual goals.

- (3) Describe the SEA’s process for reviewing the goals an LEA establishes for its Tier III schools (subject to approval by the SEA) and how the SEA will determine whether to renew an LEA’s School Improvement Grant with respect to one or more Tier III schools in the LEA that are not meeting those goals.

If there is a Phase II LEA application process for LEAs to apply to serve Tier III schools, LEAs will establish, and OSSE will approve, these goals in the application. OSSE will approve goals in mathematics and reading/language arts that either (1) are equal to the goals established by OSSE for determining AYP or (2) decrease the non-proficient percentage of students by at least 10 percent.

Tier III schools receiving funds or services through an LEA’s School Improvement Grant will be required to report on the same leading indicators on which Tier I schools are required to report. In determining whether to renew an LEA’s School Improvement Grant with respect to one or more Tier III schools in the LEA, OSSE will determine whether a school “made significant progress,” “made some progress,” or “made little or no progress” toward meeting its achievement goals and on the leading indicators. The same criteria that apply to Tier I schools for these ratings will apply to Tier III schools. For an LEA to receive renewal funds for a Tier III school, the Tier III school must have either (1) made significant progress in one area or (2) made some progress in both areas. For schools that did not make significant progress in any area and made little or no progress in one or more areas, the LEA will not receive funds toward a renewal award. LEAs will be required to consider and report on plans for adjustment to the original plan for any school that did not meet annual goals.

- (4) Describe how the SEA will monitor each LEA that receives a School Improvement Grant to ensure that it is implementing a school intervention model fully and effectively in the Tier I and Tier II schools the LEA is approved to serve.

Regular On-site Monitoring

OSSE’s Office of Elementary and Secondary Education has initiated a new on-site monitoring cycle for the 2009-2010 and 2010-2011 school years, in which all LEAs will be monitored on-site at least once during these two years. LEAs monitored on-site as part of this coordinated monitoring plan will be monitored for their implementation of their School Improvement Grant program, among all other Elementary and Secondary Education programs for which the LEA receives federal grant funds. OSSE’s Title I monitoring indicators, based on the Department’s indicators for SEAs, include indicators related to school improvement.

While under the new policy each LEA will receive at least one on-site visit once every two years, OSSE is also using a risk assessment tool to identify LEAs that may need additional onsite monitoring. OSSE may consider the following and conduct additional on-site monitoring:

- **A-133 Single audits results,**
- **Consistent noncompliance relative to unresolved findings from previous monitoring reviews,**
- **Individual complaints to the agency,**
- **Higher grant award totals,**

- Excess carryover or failure to liquidate funds,
- Late reporting (e.g. expenditures, status reports, progress reports, equipment inventory),
- Lack of alignment between expenditures and approved budget,
- Percent of disallowed to allowed expenditures,
- Excessive administrative costs,
- Failure to adhere to terms and conditions set forth in the Grant Award Notice (GAN), and
- Failure to make substantial progress toward grant goals and objectives.

The combined use of a two-year onsite monitoring schedule and risk based monitoring strengthens OSSE’s general oversight of all LEAs.

Desktop Monitoring

Second, OSSE will perform desktop monitoring, led by an assigned SEA Title I staff member at least bi-monthly, including but not limited to reviewing reimbursement requests for School Improvement Grants and reviewing annual and other interim reports LEAs will provide as required by OSSE describing the progress of the school improvement intervention implementation in Tier I schools and reporting data on the leading indicators identified in the final regulations and the LEA application. These reports and data will also be used to determine whether renewal grants are awarded to each LEA.

Targeted Monitoring for School Improvement Funds

Third, based on reviews of data reports, other desktop monitoring activities, and findings and observations from the regular LEA on-site monitoring cycle, OSSE will at least twice annually perform additional focused on-site monitoring of the implementation of selected school improvement interventions within all funded LEAs and provide additional technical assistance and support to ensure that School Improvement funds are effectively used to implement interventions consistent with the final requirements. This additional focused on-site monitoring will review at least the following:

- Progress toward achievement goals (both annual measurable objectives and annual goals set in the School Improvement Grant application, where these are different),
- Progress toward improvement on the leading indicators,
- Fidelity to the approved school intervention model implementation plan and timelines,
- The effectiveness of instruction and the quality of the learning environment, and
- Other indicators that directly relate to the specific intervention model being implemented.

Again, only two LEAs are eligible to receive funds for serving Tier I schools. Therefore, OSSE can focus a substantial portion of its School Improvement Grant monitoring activities within these two LEAs.

Finally, OSSE is considering using a portion of the State-level funds it has reserved from its School Improvement Grant to fund a third-party evaluation of the implementation and results of school improvement interventions.

- (5) Describe how the SEA will prioritize School Improvement Grants to LEAs if the SEA does not have sufficient school improvement funds to serve all eligible schools for which each LEA applies.

First, OSSE will prioritize serving all Tier I schools first. As described above, OSSE will first collect applications only from LEAs with Tier I schools only for proposed plans to serve their Tier I schools. This includes only two LEAs. Consistent with the Departments' non-regulatory Guidance, OSSE will make efforts to spread 1003(g) funds among different districts.

Secondary to that criterion, OSSE will prioritize the lowest of the persistently lowest-achieving schools in the District. Therefore, if there are insufficient funds to serve all Tier I schools, OSSE will award funds to schools within LEAs with multiple Tier I schools beginning with the lowest performing school and continuing until there are insufficient funds to provide for a full and effective intervention in any more schools.

- (6) Describe the criteria, if any, that the SEA intends to use to prioritize among Tier III schools.

Applications will be received in a Phase II application process only if there are sufficient funds to serve more than just Tier I schools. In the two scenarios below, there will be additional funds left to award for Tier III schools this year after Phase I of the LEA application process:

- 1. DCPS and Options Public Charter School submit fully acceptable plans to serve all Tier I schools in the District for a total of less than \$11.9 million over 3 years.**
- 2. DCPS and Options Public Charter School submit fully acceptable plan to serve fewer than all 10 Tier I schools (due to a lack of capacity) for a total of less than approximately \$8.9 million (the maximum available for awards for 2010-2011 in this scenario, knowing that, if not all Tier I schools will be served in 2010-2011, OSSE must reserve 25 percent of its SIG award to combine it with the FY 2010 award to serve additional Tier I schools next year).**

In reviewing Phase II applications, if necessary, OSSE will first prioritize funding Tier III schools in which LEAs commit to fully implement one of the four school intervention models required for Tier I and Tier II schools.

Second, OSSE will prioritize the lowest-ranked schools on the District's list used to identify the persistently lowest achieving schools. That is, the school ranked just above the 7th Tier I school identified based on achievement data (and not graduation data alone) would be prioritized above all others, then the school ranked above that, and so on. This priority will be assigned both within Tier III schools in which LEAs commit to fully implement one of the four intervention models and, if necessary, additional Tier III schools for which LEAs propose other school improvement activities.

Any "conditionally approved" (after revisions) or "fully approved" application may be awarded funds based on the needs of the school and the budget requested as a result of the needs.

- (7) If the SEA intends to take over any Tier I or Tier II schools, identify those schools and indicate the school intervention model the SEA will implement in each school.

OSSE does not intend to take over any Tier I or Tier II schools.

- (8) If the SEA intends to provide services directly to any schools in the absence of a takeover, identify those schools and, for Tier I or Tier II schools, indicate the school intervention model the SEA will implement in each school, and provide evidence of the LEA's approval to have the SEA provide the services directly.[†]

OSSE does not intend to provide services directly to any schools in the absence of a takeover.

[†] If, at the time an SEA submits its application, it has not yet determined whether it will provide services directly to any schools in the absence of a takeover, it may omit this information from its application. However, if the SEA later decides that it will provide such services, it must amend its application to provide the required information.

E. ASSURANCES: The SEA must provide the assurances set forth below.

By submitting this application, the SEA assures that it will do the following:

- Comply with the final requirements and ensure that each LEA carries out its responsibilities.
- Award each approved LEA a School Improvement Grant in an amount that is of sufficient size and scope to implement the selected intervention in each Tier I and Tier II school that the SEA approves the LEA to serve.
- Apportion its school improvement funds in order to make grants to LEAs, as applicable, that are renewable for the length of the period of availability, taking into account any waivers that may have been requested and received by the SEA or an individual LEA to extend the period of availability.
- Carry over 25 percent of its FY 2009 school improvement funds, combine those funds with FY 2010 school improvement funds, and award those funds to eligible LEAs consistent with the final requirements if not every Tier I school in the State receives FY 2009 school improvement funds to implement a school improvement model in the 2010-2011 school year (unless the SEA does not have sufficient school improvement funds to serve every Tier I school in the State).
- Ensure, if the SEA is participating in the Department's differentiated accountability pilot, that its LEAs will use school improvement funds consistent with the final requirements.
- Monitor each LEA's implementation of the interventions supported with school improvement funds.
- To the extent a Tier I or Tier II school implementing the restart model becomes a charter school LEA, hold the charter school operator or charter management organization accountable, or ensure that the charter school authorizer holds the respective entity accountable, for meeting the final requirements.
- Post on its Web site, within 30 days of awarding School Improvement Grants, all final LEA applications and a summary of the grants that includes the following information: name and NCES identification number of each LEA awarded a grant; amount of the grant; name and NCES identification number of each school to be served; and type of intervention to be implemented in each Tier I and Tier II school.
- Report the specific school-level data required in section III of the final requirements.

F. SEA RESERVATION: An SEA may reserve an amount not to exceed five percent of its School Improvement Grant for administration, evaluation, and technical assistance expenses.

The SEA must briefly describe the activities related to administration, evaluation, and technical assistance that the SEA plans to conduct with the State-level funds it has received from its School Improvement Grant.

OSSE will use the State-level funds it has reserved from its School Improvement Grant in several ways consistent with Sections 1003(g)(8), 1117(a)(4)(A), and 1117(c)(1)(A) of the Elementary and Secondary Education Act.

First, OSSE will use a portion of the set-aside to fund part of a staff position devoted to building upon and implementing OSSE's statewide system of support to provide technical assistance to LEAs with schools in improvement, corrective action, or restructuring and the schools themselves in order to increase the opportunity for all students served by those agencies and schools to meet the State's academic content standards and student academic achievement standards.

Second, OSSE intends to use these funds to provide funding for school support team staff. The first priority for the District's school support teams this year will be to provide support, consistent with Section 1117 of the ESEA, to the persistently lowest achieving schools. Next, other schools in restructuring will receive priority in the provision of resources and other support.

At this time, OSSE is separately working on more detailed plans to build on its statewide system of support. Further details can be provided as those plans are finalized. OSSE is interested in using the one-time State-level funds available under the American Recovery and Reinvestment Act of 2009 to build additional capacity at the SEA to provide better ongoing support to LEAs through evaluation and technical assistance.

Third, some funds will be used to purchase supplies and materials and to support attendance by OSSE staff and/or other school support team staff at conferences related to school improvement and turnaround research and practice.

Finally, a portion of the State-level funds it has reserved from its School Improvement Grant may be used to fund a third-party evaluation of the implementation and results of school improvement interventions.

G. CONSULTATION WITH STAKEHOLDERS: An SEA must consult with its Committee of Practitioners and is encouraged to consult with other stakeholders regarding its application for a School Improvement Grant.

Before submitting its application for a School Improvement Grant to the Department, the SEA must consult with its Committee of Practitioners established under section 1903(b) of the ESEA regarding the rules and policies contained therein.

- The SEA has consulted with its Committee of Practitioners regarding the information set forth in its application.**

The SEA may also consult with other stakeholders that have an interest in its application.

While OSSE had not consulted with any additional stakeholders prior to the initial submission of this application, OSSE has since consulted with staff at both District of Columbia Public Schools and Options Public Charter School, the two LEAs in the District of Columbia with Tier I schools. Additionally, representatives from the District of Columbia Public Charter School Board have participated in consultation sessions with Options Public Charter School.

H. WAIVERS: The final requirements invite an SEA to request waivers of the requirements set forth below. An SEA must list in its application those requirements for which it is seeking a waiver.

The District of Columbia requests a waiver of the requirements it has listed below. These waivers would allow any local educational agency (LEA) in the State that receives a School Improvement Grant to use those funds in accordance with the final requirements for School Improvement Grants and the LEA's application for a grant.

The District believes that the requested waiver(s) will increase the quality of instruction for students and improve the academic achievement of students in Tier I, Tier II, and Tier III schools by enabling an LEA to use more effectively the school improvement funds to implement one of the four school intervention models in its Tier I or Tier II schools and to carry out school improvement activities in its Tier III schools. The four school intervention models are specifically designed to raise substantially the achievement of students in the State's Tier I and Tier II schools.

- Waive section 421(b) of the General Education Provisions Act (20 U.S.C. § 1225(b)) to extend the period of availability of school improvement funds for the SEA and all of its LEAs to September 30, 2013.
- Waive section 1116(b)(12) of the ESEA to permit LEAs to allow their Tier I and Tier II Title I participating schools that will implement a turnaround or restart model to "start over" in the school improvement timeline.

The District assures that it will ensure that any LEA that chooses to implement one or more of these waivers will comply with section II.A.8 of the final requirements.

The District assures that it will permit an LEA to implement the waiver(s) only if the LEA receives a School Improvement Grant and requests to implement the waiver(s) in its application. As such, the LEA may only implement the waiver(s) in Tier I, Tier II, and Tier III schools, as applicable, included in its application.

The District assures that, prior to submitting this request in its School Improvement Grant application, the State provided all LEAs in the State that are eligible to receive a School Improvement Grant with notice and a reasonable opportunity to comment on this request and has attached a copy of that notice as well as copies of any comments it received from LEAs. The State also assures that it provided notice and information regarding this waiver request to the public in the manner in which the State customarily provides such notice and information to the public (*e.g.*, by publishing a notice in the newspaper; by posting information on its Web site) and has attached a copy of, or link to, that notice.

The District assures that, if it is granted one or more of the waivers requested above, it will submit to the U.S. Department of Education a report that sets forth the name and NCES District Identification Number for each LEA implementing a waiver, including which specific waivers each LEA is implementing.

I. Attachments

Attachment A is the District of Columbia's definition of persistently lowest-achieving schools, which was used to develop its list of Tier I, Tier II, and Tier III schools (pdf).

Attachment B is a list of eligible schools by LEA. Within each LEA, Tier I, Tier II, and Tier III schools are listed (xls).

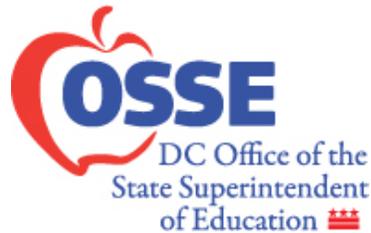
Attachment C is a draft of the LEA Application for School Improvement Grants (xls).

Attachment D is a draft of the LEA Application Review Rubric (xls).

Attachment E is a copy of the notice of OSSE's proposed request for waivers and invitation for comments provided to LEAs through email (pdf).

Attachment F is a copy of the notice of the proposed request for waivers provided to LEAs and the public on OSSE's website (pdf).

Attachment G is a list of all comments received from LEAs regarding the requested waivers (pdf).



March 3, 2010

Persistently Lowest-Achieving Schools in the District of Columbia

The U.S. Department of Education issued guidance that all state education agencies must define the “persistently lowest-achieving schools” using the following definition:

Persistently lowest-achieving schools means, as determined by the state:

- (i) Any Title I school in improvement, corrective action, or restructuring that
 - (a) Is among the lowest-achieving five percent of Title I schools in improvement, corrective action, or restructuring or the lowest-achieving five Title I schools in improvement, corrective action, or restructuring in the State, whichever number of schools is greater; or
 - (b) Is a high school that has had a graduation rate as defined in 34 CFR 200.19(b) that is less than 60 percent over a number of years; and
- (ii) Any secondary school that is eligible for, but does not receive, Title I funds that
 - (a) Is among the lowest-achieving five percent of secondary schools or the lowest-achieving five secondary schools in the State that are eligible for, but do not receive, Title I funds, whichever number of schools is greater; or
 - (b) Is a high school that has had a graduation rate as defined in 34 CFR 200.19(b) that is less than 60 percent over a number of years.

To identify the lowest-achieving schools, a state must take into account both

- (i) The academic achievement of the “all students” group in a school in terms of proficiency on the state’s assessments under section 1111(b)(3) of the ESEA in reading/language arts and mathematics combined; and
- (ii) The school’s lack of progress on those assessments over a number of years in the “all students” group.

For more information, see the U.S. Department of Education’s *Guidance on School Improvement Grants Under Section 1002(g) of the Elementary and Secondary Education Act of 1965* (<http://www.ed.gov/programs/sif/guidance-20091218.doc>).

OSSE created a definition for the persistently-lowest achieving schools in the District of Columbia that assigns points to every school in the District based on its standing with the following three elements: current year improvement status; overall growth in the percentage of students scoring proficient or above in the school from 2007 to 2009 in both reading/language arts and mathematics; and whether the percentage of students overall in the school scoring proficient or above is more than half the distance from the annual measurable objective (AMO) over a two- or three-year period in both reading/language arts and mathematics. OSSE added the points assigned to each school based on these data elements and ranked school based on total points. Per federal requirements, OSSE defined a “Tier I” and “Tier II” based on the definition above.

Tier I Schools

In order to determine the number of schools that meet the definition of Tier I schools (as defined in (i) above), OSSE used the following method:

- There are 131 schools receiving Title I funds in the District of Columbia that are identified for improvement in the 2009-2010 school year.
- Five percent of that total is 7 schools. OSSE must identify the seven lowest-achieving Title I schools as the persistently lowest achieving.

- OSSE assigned points to every public school in the city based on the following three factors. Points are awarded to all schools (a total of 90 point are available) and then schools are ranked based on total points. In this definition, the worst-case scenario would mean a school has 90 points.
1. Improvement status. Schools were assigned points based on the current year’s improvement status, which is an indicator that factors in persistence: schools in restructuring have missed AYP for six years.
 - 10 points if they are in improvement year 1;
 - 20 points if they are in improvement year 2;
 - 30 points if they are corrective action;
 - 40 points if they are in restructuring planning; or
 - 50 points if they are in restructuring implementation.
 2. Overall growth. Schools were assigned points if the aggregate percentage of students scoring proficient or above did not increase over a period of years, in both reading and mathematics (*i.e.*, lack of growth). This indicator is intended to give credit for schools that may be identified for improvement, not making adequate yearly progress, but that are improving student achievement.
 - 10 points if there was a decrease in reading from 2007 to 2009; and
 - 10 points if there was a decrease in mathematics from 2007 to 2009.
 3. Distance from the annual measurable objective (AMO). This measure combines a school’s overall proficiency rate with a persistence factor. Schools were assigned points based on whether the school has repeatedly had an overall percentage of students scoring proficient or above in reading or mathematics that is less than half the state’s AMO for that year. The AMO is the target a school needs to reach in order to make adequate yearly progress.
 - 5 points if the percentage proficient or above in reading is less than half the AMO for 2008 and 2009;
 - 5 points if the percentage proficient or above in reading is less than half the AMO for 2007, 2008, and 2009;
 - 5 points if the percentage proficient or above in mathematics is less than half the AMO for 2008 and 2009; and
 - 5 points if the percentage proficient or above in mathematics is less than half the AMO for 2007, 2008, and 2009.
- OSSE also identified any high school with a graduation rate less than 60 percent in the two most recent years.

The following ten schools in the District of Columbia meet the definition of Tier I “persistently lowest-achieving” for the 2009-2010 school year, either for being one of the lowest-achieving five percent of Title I schools identified for improvement or for having a graduation rate below 60 percent in each of the two previous years:

Lowest achieving 5 percent

- Browne JHS
- Dunbar SHS
- Hamilton Center
- Kenilworth ES
- Options Public Charter School
- Prospect LC
- Spingarn SHS

Low graduation rate

- Anacostia SHS
- Eastern SHS
- Luke C. Moore Academy

Tier II Schools

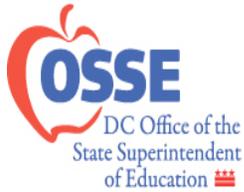
Each state is also required to define its Tier II schools that meet the definition outlined above in (ii). Currently, there are no secondary schools in the District of Columbia that are eligible for, but do not receive, Title I funds. All secondary schools are currently receiving Title I funds. As a result, there are no Tier II schools, as defined by the U.S. Department of Education.

Questions may be addressed to Donna Sabis-Burns, Deputy Assistant Superintendent of Elementary and Secondary Education (Donna.Sabis-Burns@dc.gov).

LEA Name	LEA NCES ID#	Tier	School Name	School NCES ID#	GradRate	Newly Eligible
District of Columbia Public Schools (DCPS)	1100030	Tier I	Anacostia SHS	00085	X	NONE
District of Columbia Public Schools (DCPS)	1100030	Tier I	Browne JHS	00021		
District of Columbia Public Schools (DCPS)	1100030	Tier I	Dunbar SHS	00079		
District of Columbia Public Schools (DCPS)	1100030	Tier I	Eastern SHS	00078	X	
District of Columbia Public Schools (DCPS)	1100030	Tier I	Hamilton Center	00261		
District of Columbia Public Schools (DCPS)	1100030	Tier I	Kenilworth ES	00177		
District of Columbia Public Schools (DCPS)	1100030	Tier I	Luke C. Moore Academy	00198	X	
District of Columbia Public Schools (DCPS)	1100030	Tier I	Prospect LC	00092		
District of Columbia Public Schools (DCPS)	1100030	Tier I	Spingarn SHS	00130		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Aiton ES	00122		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Amidon ES	00121		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Ballou SHS	00084		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Bancroft ES	00120		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Beers ES	00118		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Birney ES	00116		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Brent ES	00113		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Brightwood ES	00112		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Brookland ES	00111		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Bruce-Monroe ES	00110		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Burroughs ES	00107		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Burrville ES	00106		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Cardozo SHS	00082		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Cooke HD ES	00100		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Coolidge SHS	00081		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Davis ES	00099		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Drew ES	00097		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Eliot JHS	00151		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Ellington SHS	00016		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Emery ES	00094		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Ferebee-Hope ES	00069		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Francis JHS	00149		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Garfield ES	00165		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Garrison ES	00171		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Harris, C.W. ES	00185		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Hart MS	00135		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Hendley ES	00182		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Houston ES	00181		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Jefferson JHS	00145		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Johnson JHS	00144		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Kelly Miller MS	00272		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Ketcham ES	00176		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Kimball ES	00173		
District of Columbia Public Schools (DCPS)	1100030	Tier III	King M L ES	00102		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Kramer MS	00143		
District of Columbia Public Schools (DCPS)	1100030	Tier III	LaSalle ES	00042		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Ludlow-Taylor ES	00037		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Macfarland MS	00141		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Malcolm X ES	00036		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Mamie D. Lee School	00090		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Maury ES	00034		

District of Columbia Public Schools (DCPS)	1100030	Tier III	Miner ES	00004		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Montgomery ES	00003		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Moten ES	00002		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Nalle ES	00163		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Orr ES	00161		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Patterson ES	00158		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Plummer ES	00126		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Powell ES	00125		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Randle-Highlands ES	00029		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Raymond ES	00033		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Reed LC	00032		
District of Columbia Public Schools (DCPS)	1100030	Tier III	River Terrace ES	00028		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Ronald H. Brown MS	00021		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Roosevelt SHS	00008		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Savoy ES	00025		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Seaton ES	00024		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Shaed ES	00022		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Shaw JHS	00020		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Simon ES	00054		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Smothers ES	00064		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Sousa MS	00019		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Stanton ES	00013		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Stuart-Hobson MS	00191		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Takoma ES	00011		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Terrell MC ES	00070		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Thomas ES	00049		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Thomson ES	00046		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Thurgood Marshall ES	00188		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Truesdell ES	00075		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Tubman ES	00074		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Turner ES	00073		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Walker-Jones ES	00070		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Webb ES	00068		
District of Columbia Public Schools (DCPS)	1100030	Tier III	West ES	00067		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Whittier ES	00065		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Wilson SHS	00133		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Winston EC	00061		
District of Columbia Public Schools (DCPS)	1100030	Tier III	Woodson SHS	00055		
Academy for Learning Through the Arts (ALTA) Public Charter School	1100050	Tier III	Academy for Learning Through the Arts (ALTA) Public Charter School	00300		
Booker T. Washington Public Charter School	1100003	Tier III	Booker T. Washington Public Charter School	00217		
Capital City Public Charter School	1100035	Tier III	Capital City Public Charter School	00253		
Cesar Chavez Public Charter School	1100005	Tier III	Cesar Chavez Bruce Prep Campus	00377		
Cesar Chavez Public Charter School	1100005	Tier III	Cesar Chavez Capitol Hill Campus	00219		
Cesar Chavez Public Charter School	1100005	Tier III	Cesar Chavez Parkside Campus	00328		
Children's Studio Public Charter School	1100006	Tier III	Children's Studio Public Charter School	00220		
City Collegiate Public Charter School	1100061	Tier III	City Collegiate Public Charter School	00346		
Community Academy Public Charter School	1100007	Tier III	Community Academy AMOS 1 Campus	00221		
Community Academy Public Charter School	1100007	Tier III	Community Academy Online Campus	00380		
Community Academy Public Charter School	1100007	Tier III	Community Academy Rand-El Campus	00361		
DC Bilingual Public Charter School	1100042	Tier III	DC Bilingual Public Charter School	00273		
DC Preparatory Academy Public Charter School	1100048	Tier III	DC Preparatory Academy EC Campus	00388		

DC Preparatory Academy Public Charter School	1100048	Tier III	DC Preparatory Academy MC Campus	00277		
Elsie Whitlow Stokes Public Charter School	1100009	Tier III	Elsie Whitlow Stokes Public Charter School	00223		
E.L. Haynes Public Charter School	1100043	Tier III	E.L. Haynes Public Charter School	00274		
Friendship Public Charter School	1100008	Tier III	Friendship Blow Campus	00323		
Friendship Public Charter School	1100008	Tier III	Friendship Chamberlain Campus	00222		
Friendship Public Charter School	1100008	Tier III	Friendship Woodridge Campus	00341		
Friendship Public Charter School	1100008	Tier III	Friendship Woodson Campus	00338		
Hope Community Public Charter School	1100051	Tier III	Hope Community Tolson Campus	00386		
Hospitality Public Charter School	1100010	Tier III	Hospitality Public Charter School	00224		
Howard Road Academy Public Charter School	1100029	Tier III	Howard Road Academy Public Charter School	00245		
Hyde Leadership Academy Public Charter School	1100011	Tier III	Hyde Leadership ES	00225		
Hyde Leadership Academy Public Charter School	1100011	Tier III	Hyde Leadership HS	00225		
Integrated Design & Electronics Academy (IDEA) Public Charter School	1100013	Tier III	Integrated Design & Electronics Academy (IDEA) Public Charter School	00227		
Ideal Academy Public Charter School	1100012	Tier III	IDEAL Academy Peabody Campus	00226		
Kamit Institute for Magnificent Achievers Public Charter School	1100037	Tier III	Kamit Institute for Magnificent Achievers Public Charter School	00255		
KIPP DC Public Charter School	1100031	Tier III	KIPP DC AIM Academy	00381		
Mary McLeod Bethune Public Charter School	1100044	Tier III	Mary McLeod Bethune Slowe Campus	00275		
Maya Angelou Public Charter School	1100014	Tier III	Maya Angelou Evans Campus	00391		
Maya Angelou Public Charter School	1100014	Tier III	Maya Angelou Middle Campus	00392		
Maya Angelou Public Charter School	1100014	Tier III	Maya Angelou Shaw Campus	00228		
Meridian Public Charter School	1100015	Tier III	Meridian Public Charter School	00229		
Nia Community Public Charter School	1100070	Tier III	Nia Community Public Charter School	00332		
Options Public Charter School	1100018	Tier I	Options Public Charter School	00232		
Paul Public Charter School	1100039	Tier III	Paul Public Charter School	00257		
School for the Arts in Learning (SAIL) Public Charter School	1100021	Tier III	SAIL Lower School	00235		
Tree of Life Public Charter School	1100040	Tier III	Tree of Life Public Charter School	00258		
Two Rivers Public Charter School	1100045	Tier III	Two Rivers Public Charter School	00279		
William E. Doar Public Charter School	1100053	Tier III	William E. Doar Public Charter School	00303		
Young America Works Public Charter School	1100046	Tier III	Young America Works Public Charter School	00280		



Local Educational Agency Application for School Improvement Grants
 Provided Under Section 1003(g) of the Elementary and Secondary Education Act of 1965, as amended
 (Including Funds Provided by the American Recovery and Reinvestment Act of 2009 (ARRA))

The Office of the State Superintendent of Education (OSSE)



Submit BOTH the completed Excel workbook AND a signed, scanned copy of the Applicant Information and Certification worksheet (tab i) to SIG.App@dc.gov by 5:00 P.M. EST on Friday, April 16, 2010.

Early submissions are encouraged. Late submissions will not be considered.

Tab Title	
i	Applicant Information and Certification
ii	Assurances: Section 1003(g) School Improvement Funds
iii	Assurances: General Education Provisions Act
iv	Assurances: ARRA Reporting Schedule
v	Entire LEA: Consultation, Waivers, and Leading Indicators
vi	Entire LEA: Capacity to Serve
"A" tabs	Per School: Proposed Plan for School Improvement
"B" tabs	Per School: Explanations for Proposed Budget Items
"C" tabs	Per School: Proposed Annual Budgets
Ref1	Reference: School Improvement Grant Application Instructions
Ref2	Reference: Budget Category Definitions and Examples
Ref3	Reference: School Improvement Grant Guidance & Resources
Validation	Validation of Application's Readiness for Submission

You can navigate through this application workbook by selecting the desired worksheets at the left, except for "A," "B," and "C" worksheets. Navigate to those worksheets through the tabs at the bottom to provide the school plan/s. See Instructions for more information.

OSSE School Improvement Grants: LEA Application Review Rubric

Item to be Completed	Not Acceptable (0)	Conditionally Acceptable (1)	Fully Acceptable (2)
	The application is not at all or only slightly responsive to this requirement. The response to this component of the application cannot be approved without significant revisions.	The application is moderately or mostly responsive to this requirement. The response to this component still does not meet requirements, so the application cannot be approved without revisions.	The application is fully responsive to this requirement. This component of the application is approvable.
Applicant Information and Certification (Tab i)			
Legal name of LEA provided			
Mailing address of LEA provided			
Main telephone number of LEA provided			
DUNS number provided, matching DUNS number on file			
Name of 1003(g) coordinator provided			
Title of 1003(g) coordinator provided			
Email address of 1003(g) coordinator provided			
Telephone number of 1003(g) coordinator provided			
CCR registration confirmed by answering "Yes"			
Total amount requested is no more than \$6M times the number of schools			
Name of board member or designee provided			
Title of board member or designee provided			
Certifying signature provided in scanned copy of application			
Name of PCS board member or designee provided			
Title of PCS board member or designee provided			
Certifying signature provided in scanned copy of application			
Assurances (Tabs ii, iii, iv)			
All 1003(g) assurances checked			
All GEPA assurances checked			
Completed narrative portion for GEPA Section 427 requirement			
All ARRA reporting assurances checked			
Entire LEA: Consultation, Waiver, and Leading Indicators (Tab v)			
Consultation assurance is checked			
Details are provided for stakeholders who were consulted			
If waiver selected, schools are listed			
LEA answered yes/no for all 5 metrics			
Detailed descriptions of current or future systems are provided			

Entire LEA: Capacity to Serve (Tab vi)

If not all Tier 1 schools to be served, Title I Director must meet with LEA staff			
If applicable, lack of capacity sufficiently demonstrated (or give 2 by default)			
Action plan for Action 2.1 is complete, allows intervention by August 2010			
Narrative for Action 2.1 is complete and provides sufficient detail			
Action plan for Action 2.2 is complete, allows intervention by August 2010			
Narrative for Action 2.2 is complete and provides sufficient detail			
Action plan for Action 2.3 is complete, allows intervention by August 2010			
Narrative for Action 2.3 is complete and provides sufficient detail			
Action plan for Action 2.4 is complete, allows intervention by August 2010			
Narrative for Action 2.4 is complete and provides sufficient detail			
Action plan for Action 2.5 is complete, allows intervention by August 2010			
Narrative for Action 2.5 is complete and provides sufficient detail			

School 1: Proposed Plan for School Improvement (Tab 1A)

All required information provided for the school at the top			
Recent dates of needs assessment and analysis provided			
Ratings given for all 9 characteristics			
Assurance for maintaining needs documentation is checked			
Narrative summary of needs is comprehensive and clear			
Selected intervention is reasonable given the identified needs			
Annual student achievement goals provided for reading			
Annual student achievement goals provided for math			
Goals for reading are appropriate			
Goals for math are appropriate			
Action plan for implementation covers full intervention period			
Action plan for implementation is complete with all required elements			
Action plan for implementation meets all requirements of the model			
Action plan for implementation starts by August 2010			
Narrative of school activities is clear and comprehensive			
Narrative of LEA services is clear and comprehensive			
Narratives together meet all requirements of the intervention model			
LEA demonstrates capacity to fully and effectively implement intervention			
LEA demonstrates sufficiency of amount of funds to fully implement			
Narrative of other sources of funds is provided or NA			

School 1: Explanations for Proposed Budget Items (Tab 1B)

Part 1: All columns are complete for each individual listed			
Part 1: FTE % correlates with total amount listed			
Part 1: Description of responsibilities is clear			
Part 1: Personnel represent allowable uses of funds			
Part 2: Description of supplies and materials is thorough			
Part 2: Supplies and materials represent allowable use of funds			
Part 3: Description of fixed costs is thorough			
Part 3: Fixed costs represent allowable use of funds			
Part 4: Description of contractual services is thorough			
Part 4: Contractual services represent allowable use of funds			
Part 5: Description of equipment costs is thorough			
Part 5: Equipment costs represent allowable use of funds			
Part 6: Description of other costs is thorough			
Part 6: Other costs represent allowable use of funds			

School 1: Proposed Annual Budgets (Tab 1C)

The grand total matches what is requested on Tab i			
Total amount budgeted for salaries and benefits matches narrative			
Salaries and benefits are included in appropriate program categories			
All budget categories tie back to specific narrative descriptions			
The amounts for each of the 3 years are relatively consistent			
For LEA services, the amount is reasonable for services described in narrative			
The amount requested is appropriate for the intervention selected			

School 2: Proposed Plan for School Improvement (Tab 2A)

All required information provided for the school at the top			
Recent dates of needs assessment and analysis provided			
Ratings given for all 9 characteristics			
Assurance for maintaining needs documentation is checked			
Narrative summary of needs is comprehensive and clear			
Selected intervention is reasonable given the identified needs			
Annual student achievement goals provided for reading			
Annual student achievement goals provided for math			
Goals for reading are appropriate			
Goals for math are appropriate			
Action plan for implementation covers full intervention period			
Action plan for implementation is complete with all required elements			
Action plan for implementation meets all requirements of the model			
Action plan for implementation starts by August 2010			
Narrative of school activities is clear and comprehensive			
Narrative of LEA services is clear and comprehensive			
Narratives together meet all requirements of the intervention model			
LEA demonstrates capacity to fully and effectively implement intervention			
LEA demonstrates sufficiency of amount of funds to fully implement			
Narrative of other sources of funds is provided or NA			

School 2: Explanations for Proposed Budget Items (Tab 2B)

Part 1: All columns are complete for each individual listed			
---	--	--	--

Part 1: FTE % correlates with total amount listed			
Part 1: Description of responsibilities is clear			
Part 1: Personnel represent allowable uses of funds			
Part 2: Description of supplies and materials is thorough			
Part 2: Supplies and materials represent allowable use of funds			
Part 3: Description of fixed costs is thorough			
Part 3: Fixed costs represent allowable use of funds			
Part 4: Description of contractual services is thorough			
Part 4: Contractual services represent allowable use of funds			
Part 5: Description of equipment costs is thorough			
Part 5: Equipment costs represent allowable use of funds			
Part 6: Description of other costs is thorough			
Part 6: Other costs represent allowable use of funds			
School 2: Proposed Annual Budgets (Tab 2C)			
The grand total matches what is requested on Tab i			
Total amount budgeted for salaries and benefits matches narrative			
Salaries and benefits are included in appropriate program categories			
All budget categories tie back to specific narrative descriptions			
The amounts for each of the 3 years are relatively consistent			
For LEA services, the amount is reasonable for services described in narrative			
The amount requested is appropriate for the intervention selected			

Total of Scores
Total Applicable Rows multiplied by 2
Final Rubric Review Score

TOTAL SUM
2x NUMBER OF APPLICABLE ROWS
B136/B137

Sum of Column C scores

Sum of Column D scores

Notice of Proposed 1003(g) Waiver Request; Invitation for LEA Comments

Skinner, Jeremy (OSSE)

Sent: Tuesday, February 02, 2010 4:50 PM

To: Skinner, Jeremy (OSSE)

Cc: OSSE Comments (OSSE)

Attachments: 1003(g)_Proposed.Waiver.Re-1.pdf (68 KB) ; 1003(g)_Notice.of.Proposed-1.pdf (26 KB)

Dear LEA Representatives,

As OSSE prepares an application for School Improvement Grants to the U.S. Department of Education, OSSE proposes to request two waivers of statutory requirements that the Department has invited. Please see the attached "Notice of Proposed Waiver Requests," along with a copy of the "Proposed Waiver Request." If you would like more information about these proposed waiver requests, please join us for a 30-minute conference call on Thursday at 2:00 P.M. (see attachment for more information).

OSSE invites comments from LEAs on these two proposed waiver requests. We will accept comments until noon on Monday, February 8.

All my best,
Jeremy

Jeremy E. Skinner, J.D., Director
Teaching and Learning Division
(Title I, Part A; Title II, Part A; Title III, Part A; and SFSF)
Elementary and Secondary Education
Office of the State Superintendent of Education
51 N Street NE, 3rd Floor
Washington, DC 20002
[202.724.2343 \(o\)](tel:202.724.2343)
[202.368.3128 \(c\)](tel:202.368.3128)
Jeremy.Skinner@dc.gov
www.osse.dc.gov

Let us know how we're doing!

Please take a few minutes to tell us about the quality of service you received from the OSSE Teaching and Learning team during your recent experience with us.

OSSE Plans to Request Waivers Related to 1003(g) School Improvement Grants; Invites Comments from LEAs by February 8th

In its upcoming School Improvement Grant application to the U.S. Department of Education, the Office of the State Superintendent of Education proposes to request waivers of two statutory requirements. These waivers will affect LEAs that apply for and receive Section 1003(g) School Improvement Grants for Federal Fiscal Year 2009, along with the schools/campuses the LEAs serve with those funds. The OSSE plans to apply for these waivers on behalf of all such LEAs in the District. If the OSSE receives approval from the Department, LEAs will need to indicate their intention to implement one or both of the waivers as part of the LEA application for these funds, which will be released after OSSE receives approval of its SEA application.

The requests are to:

- Waive section 421(b) of the General Education Provisions Act (20 U.S.C. § 1225(b)) to extend the period of availability of school improvement funds for the SEA and all of its LEAs to September 30, 2013.
- Waive section 1116(b)(12) of the ESEA to permit LEAs to allow their Tier I and Tier II Title I participating schools that will implement a turnaround or restart model to “start over” in the school improvement timeline.

More Information about School Improvement Grants

School Improvement Grants made available under Section 1003(g) of the Elementary and Secondary Education Act will be used primarily to fund interventions in the District’s persistently lowest achieving schools. While LEAs with other schools identified for improvement, corrective action, or restructuring may later apply for awards if sufficient funds are available, only LEAs with one or more persistently lowest achieving schools will be eligible to apply in Phase I. [Click here](#) for a preliminary list of the District’s persistently lowest achieving schools. Additional information regarding School Improvement Grants made available under Section 1003(g) of the Elementary and Secondary Education Act can be found at <http://www.ed.gov/programs/sif/index.html>.

Webinar

OSSE will host a 30-minute webinar/conference call on Thursday, February 4, 2010, at 2:00 P.M. to discuss these waivers and the District’s School Improvement Grant application generally. [Click here to register](#). The conference call number is 1-800-516-9896; the participant code is 1191151793.

Comments

LEAs wishing to comment on these proposed waiver requests should submit their comments in writing to osse.comments@dc.gov by noon on Monday, February 8, 2010. Any comments submitted will be included, without identifying information, in the District’s School Improvement Grant application to the U.S. Department of Education. Comments submitted at or after 12:01 P.M. on Monday, February 8th will not be considered or included.

For additional information on these planned waiver requests, please contact Jeremy Skinner at (202) 724-2343 or via email at jeremy.skinner@dc.gov.

**TEXT OF PROPOSED REQUEST TO THE U.S. DEPARTMENT OF EDUCATION
FOR SCHOOL IMPROVEMENT GRANT-RELATED WAIVERS**

H. WAIVERS: The final requirements invite an SEA to request waivers of the requirements set forth below. An SEA must list in its application those requirements for which it is seeking a waiver.

The District of Columbia requests a waiver of the requirements it has listed below. These waivers would allow any local educational agency (LEA) in the State that receives a School Improvement Grant to use those funds in accordance with the final requirements for School Improvement Grants and the LEA's application for a grant.

The District believes that the requested waiver(s) will increase the quality of instruction for students and improve the academic achievement of students in Tier I, Tier II, and Tier III schools by enabling an LEA to use more effectively the school improvement funds to implement one of the four school intervention models in its Tier I or Tier II schools and to carry out school improvement activities in its Tier III schools. The four school intervention models are specifically designed to raise substantially the achievement of students in the State's Tier I and Tier II schools.

- Waive section 421(b) of the General Education Provisions Act (20 U.S.C. § 1225(b)) to extend the period of availability of school improvement funds for the SEA and all of its LEAs to September 30, 2013.
- Waive section 1116(b)(12) of the ESEA to permit LEAs to allow their Tier I and Tier II Title I participating schools that will implement a turnaround or restart model to "start over" in the school improvement timeline.

The District assures that it will ensure that any LEA that chooses to implement one or more of these waivers will comply with section II.A.8 of the final requirements.

The District assures that it will permit an LEA to implement the waiver(s) only if the LEA receives a School Improvement Grant and requests to implement the waiver(s) in its application. As such, the LEA may only implement the waiver(s) in Tier I, Tier II, and Tier III schools, as applicable, included in its application.

The District assures that, prior to submitting this request in its School Improvement Grant application, the State provided all LEAs in the State that are eligible to receive a School Improvement Grant with notice and a reasonable opportunity to comment on this request and has attached a copy of that notice as well as copies of any comments it received from LEAs. The State also assures that it provided notice and information regarding this waiver request to the public in the manner in which the State customarily provides such notice and information to the public (*e.g.*, by publishing a notice in the newspaper; by posting information on its Web site) and has attached a copy of, or link to, that notice.

The District assures that, if it is granted one or more of the waivers requested above, it will submit to the U.S. Department of Education a report that sets forth the name and NCES District Identification Number for each LEA implementing a waiver, including which specific waivers each LEA is implementing.

Generated

Feb 11, 2010 03:52 PM PST

General Information

Webinar Name
School Improvement Grant Application for DC**Webinar ID**
531749947**Actual Start Date/Time**
Feb 04, 2010 02:03 PM EST**Actual Duration (minutes)**
22**Clicked Registration Link**
16**Opened Invitation**
0**Total Attended**
7

Session Details

Hill,Kyle	khill@hydedc.org
Attended Yes	
Registration Date	Feb 04, 2010 10:56 AM EST
Organization	Hyde Leadership Public Charter School
Unsubscribed	No
Phone	202-551-0807
Job Title	Assistant Head of School

In Session

Join Time	Leave Time	In Session Duration (minutes)
Feb 04, 2010 02:03 PM EST	Feb 04, 2010 02:24 PM EST	21.48

Interest Rating

Attendee's In-Session Level of Interest: 303

Registration Q & A

Questions Asked by Attendee

Poll Questions

Post Session Survey Questions

Goodall,Ashaki	ashakigoodall@capcs.org
Attended Yes	
Registration Date	Feb 03, 2010 08:17 PM EST
Organization	Dorothy I Height Community Academy Public Charter Schools
Unsubscribed	No
Phone	(202) 234-2122, ext. 5205
Job Title	Director of Development and External Affairs

In Session

Join Time	Leave Time	In Session Duration (minutes)
Feb 04, 2010 02:05 PM EST	Feb 04, 2010 02:24 PM EST	19.13

Interest Rating

Attendee's In-Session Level of Interest: 106

Registration Q & A

Questions Asked by Attendee

Poll Questions

Post Session Survey Questions

Kantasingh, Kisha **kisha.kantasingh@dc.gov**

Attended Yes

Registration Date Feb 03, 2010 09:25 AM EST

Organization DCPS

Unsubscribed No

Phone 2026403700

Job Title Grant Writer

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Feb 04, 2010 02:03 PM EST	Feb 04, 2010 02:24 PM EST	21.62

Interest Rating

Attendee's In-Session Level of Interest: 104

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

Johnson, Sandra **kimapcsdc@yahoo.com**

Attended Yes

Registration Date Feb 03, 2010 03:36 PM EST

Organization Kamit Institute for Magnificent Achievers

Unsubscribed No

Phone 202-723-7886 ext 227

Job Title Business Manager

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Feb 04, 2010 02:11 PM EST	Feb 04, 2010 02:24 PM EST	13.65

Interest Rating

Attendee's In-Session Level of Interest: 225

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

Bartley,Christian **cbartley@nia-cpcs.org**

Attended Yes

Registration Date Feb 03, 2010 11:58 AM EST

Organization Nia Community Public Charter School

Unsubscribed No

Phone 202-562-5440

Job Title Executive Assistant

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Feb 04, 2010 02:03 PM EST	Feb 04, 2010 02:24 PM EST	21.62

Interest Rating

Attendee's In-Session Level of Interest: 309

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

Cox,Katie **kcox@tmapchs.org**

Attended Yes

Registration Date Feb 04, 2010 02:04 PM EST

Organization Thurgood Marshall Academy

Unsubscribed No

Phone 202-563-6862 ext. 146

Job Title Assistant Grants Manager

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
Feb 04, 2010 02:04 PM EST	Feb 04, 2010 02:24 PM EST	20.02

Interest Rating

Attendee's In-Session Level of Interest: 144

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

black,clairdean **clairdean.black@iapcs.com**

Attended Yes

Registration Date Feb 03, 2010 11:42 AM EST

Organization Ideal Academy PCS

Unsubscribed No

Phone 202-729-6660

Job Title Federal Grants Program Manager

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
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Feb 04, 2010 02:03 PM EST	Feb 04, 2010 02:24 PM EST	21.55
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Interest Rating

Attendee's In-Session Level of Interest: 306

[Registration Q & A](#)

[Questions Asked by Attendee](#)

[Poll Questions](#)

[Post Session Survey Questions](#)

Upton, Gayle **gayleupson@capcs.org**

Attended No

Registration Date Feb 03, 2010 10:43 AM EST

Organization Community Academy Public Charter School

Unsubscribed No

Phone 202-368-3618

Job Title Director of Curriculum

[In Session](#)

Join Time	Leave Time	In Session Duration (minutes)
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Interest Rating

Attendee's In-Session Level of Interest:

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OSSE Plans to Request Waivers Related to 1003 (g) School Improvement Grants

In its upcoming School Improvement Grant application to the US Department of Education, the Office of the State Superintendent of Education proposes to request waivers of two statutory requirements. These waivers will affect LEAs that apply for and receive Section 1003 (g) School Improvement Grants for Federal Fiscal Year 2009, along with the schools/campuses the LEAs serve with those funds. The OSSE plans to apply for these waivers on behalf of all such LEAs in the District. If the OSSE receives approval from the Department, LEAs will need to indicate their intention to implement one or both of the waivers as part of the LEA application for these funds, which will be released after OSSE receives approval of its SEA application.

The requests are to:

- Waive section 421(b) of the General Education Provisions Act (20 U.S.C. § 1225 (b)) to extend the period of availability of school improvement funds for the SEA and all of its LEAs to September 30, 2013.
- Waive section 1116(b)(12) of the ESEA to permit LEAs to allow their Tier I and Tier II Title I participating schools that will implement a turnaround or restart model to “start over” in the school improvement timeline.

[View*](#) the text of the full proposed waiver request.

More Information about School Improvement Grants

School Improvement Grants made available under Section 1003 (g) of the Elementary and Secondary Education Act will be used primarily to fund interventions in the District’s persistently lowest achieving schools. While LEAs with other schools identified for improvement, corrective action, or restructuring may later apply for awards if sufficient funds are available, only LEAs with one or more persistently lowest achieving schools will be eligible to apply in Phase I. [View*](#) a preliminary list of the District’s persistently lowest achieving schools. Additional information regarding School Improvement Grants made available under Section 1003 (g) of the Elementary and Secondary Education Act can be [found here](#).

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Comments

LEAs wishing to comment on these proposed waiver requests should submit their comments in writing to osse.comments@dc.gov by noon on Monday, February 8, 2010. Any comments submitted will be included, without identifying information, in the District’s School Improvement Grant application to the US Department of Education. Comments submitted at or after 12:01 pm on Monday, February 8 will not be considered or included.

For additional information on these planned waiver requests, please contact Jeremy

PROGRAMS

INFORMATION

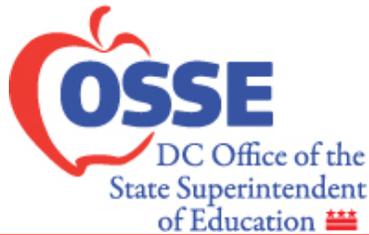
STATE BOARD OF EDUCATION

ONLINE SERVICE REQUESTS

Skinner at (202) 724-2343 or via email at jeremy.skinner@dc.gov.

* This document is presented in Portable Document Format (PDF). A PDF reader is required for viewing. [Download a PDF Reader](#) or [Learn More About PDFs](#).

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COMMENTS RECEIVED FROM LOCAL EDUCATIONAL AGENCIES ON THE DISTRICT’S REQUEST TO WAIVE SECTION 421(B) OF THE GENERAL EDUCATION PROVISIONS ACT (20 U.S.C. § 1225(B)) TO EXTEND THE PERIOD OF AVAILABILITY OF SCHOOL IMPROVEMENT FUNDS FOR THE SEA AND ALL OF ITS LEAS TO SEPTEMBER 30, 2013:

No comments regarding this waiver were received.

COMMENTS RECEIVED FROM LOCAL EDUCATIONAL AGENCIES ON THE DISTRICT’S REQUEST TO WAIVE SECTION 1116(B)(12) OF THE ESEA TO PERMIT LEAS TO ALLOW THEIR TIER I AND TIER II TITLE I PARTICIPATING SCHOOLS THAT WILL IMPLEMENT A TURNAROUND OR RESTART MODEL TO “START OVER” IN THE SCHOOL IMPROVEMENT TIMELINE:

COMMENT 1:

[The LEA] no problems with the proposed waiver requests for the School Improvement Grants. Thank you for the opportunity to review the proposed waiver requests and comment.

COMMENT 2:

We are concerned with the impact that letting turnaround and restart schools “start over” in the school improvement timeline would have on those schools which are in the improvement process though not at the turnaround or restart stage. In particular, there are several schools that would be able to exit their advanced negative status in this manner, while other schools that are in Corrective Action or Restructuring (for example) would remain further along in the improvement process and would look comparatively (and inaccurately) worse as a result... in essence penalizing those schools.

It seems more appropriate, and more accurate, to keep these schools in their current improvement status (thus increasing the pressure on the new leadership at these schools to use these significant funds in the most effective and time-sensitive manner to bring about true improvement) even while implementing these turnaround or restart models. If there is a need for more time for these schools to put such plans in place, a better solution would then be to request that these schools be able to “freeze” their current statuses for 1 or 2 years while putting the new initiatives in place, rather than allowing them to quickly and easily “restart” their improvement statuses and in essence reward their history of negative results.

COMMENT 3:

We have serious concerns over the second waiver request and urge OSSE to omit that waiver request in its application to the Department of Education. By way of reference, that second waiver request is as follows: "Waive section 1116(b)(12) of the ESEA to permit LEAs to allow their Tier I and Tier II Title I participating schools that will implement a turnaround or restart model to “start over” in the school improvement timeline." In short, this waiver would lead to a number of unintended negative consequences that would vastly outweigh any benefits of allowing such a waiver.

1. This waiver would create a disincentive for urgent reform and runs counter to the stated purposes of improvement funds.

OSSE has presented that allowing turnaround or restart schools to reset their school improvement status would be necessary for 1003g funds to be effective. However, such a waiver in fact would create a perverse disincentive for immediate reform by allowing those schools that are in the bottom 5% of schools in DC to fully reset their school improvement status and in effect grant them another five to seven years before serious consequences could be meted out (all the while providing them up to \$2 million EACH for their efforts). In the meantime, those schools that are also legitimately struggling, but perhaps not "persistently" enough by definition to fall into the bottom 5% (a

somewhat arbitrary distinction when it comes to the quality of education actually being provided to the students), have to implement similar measures as part of their "Restructuring" status, but without the funds and without the benefit of exiting the school improvement calendar. By allowing the turnaround schools to reset their school improvement status, we would be removing a strong incentive to put in place immediate improvements, with urgency and critical attention, at those schools. Instead, we will have given those schools the benefit of having "turned themselves around" with actually requiring them to have shown any longstanding, reliable results or accountability. The threat would therefore be real that significant amounts of federal funds would be thrown at an ineffective solution, a problem that would be paid for through ineffective education for another seven years. These 1003g funds are significant and should be tied to some high stakes and a requirement for immediate improvements - we should not be granting these schools an additional period of time to potentially struggle and provide poor education at additional cost.

This situation is complicated further due to certain realities here in DC. Although these funds are available for all LEAs in DC (DCPS and Charters), in reality, because of the number of schools DCPS encompasses (and therefore the fact that the majority of the bottom 5% schools would be DCPS schools) and because of the realities of per pupil funding and charter authorizing in DC (charter LEAs that would be persistently struggling enough to become Tier I or II schools would likely not be able to keep their enrollment up and would have lost their charters before ever being eligible for these 1003g funds), it would be very unlikely that a significant number of charter LEAs would receive these funds. We are therefore talking for all intents and purposes about a \$12 million dollar pot of funds that will mostly if not nearly entirely be going to DCPS schools - which in and of itself is absolutely fine. However, in DCPS, we have a number of union/teacher contract issues that would have an impact on what measures a school could actually implement as part of its turnaround model. The turnaround model requires a new principal and turnover of at least 50% of its teaching staff, among others. Without clear definition of what this actually means, however, we could see a situation where principals and teachers are merely shifted from one DCPS school to another (due to union and teacher contract limitations on who could be fired and hired) - technically fulfilling the definition of this model but in reality not improving the circumstances in those schools. By then granting those schools an ability to reset their improvement statuses, we are in effect using \$12 million dollars to potentially fund not only restructuring measures that would already be part of DCPS's plans but also stop gap measures that do not actually lead to a true "turnaround" of that school.

2. The waiver would create unjustifiable contradictions with other grant programs.

These funds are FFY 2009 1003(g) funds. At the same time, we also have FFY 2009 1003(a) school improvement funds, available for all schools in improvement, including those eligible for 1003(g) funds. By allowing schools that implement the turnaround model to reset their calendar for 1003(g) funds, this waiver would create an unjustifiable situation where these schools would first receive 1003(a) funds - and prevent other schools in improvement from receiving those funds - and then later, starting with the 2010-11 school year, implement a turnaround model and fully exiting its improvement status. This is at best a waste of 1003(a) funds (funds which would no longer be a part of long-term improvement innovations since those schools would have exited improvement through a loophole) and at worst a double rewarding of poorly functioning schools... again, schools that will most likely be DCPS schools. Without any viable way of ensuring that 1003(a) funds are not given to the schools ultimately incorporating a turnaround model or restart model, the best way to avoid this situation is to not allow such schools to reset their improvement statuses. They SHOULD be receiving 1003(a) funds for as long as they are in improvement status -- it is the giving of such funds to schools that will ultimately be able to exit those statuses through a process other than actual improvement that is unacceptable.

3. This waiver would create an inequitable situation for other LEAs in improvement status.

An additional consideration is that by allowing schools to reset their improvement status with this turnaround model, those other schools that are in corrective action or restructuring (but not eligible for 1003(g) funds) will be perceived as that much worse through no fault of their own. Particularly schools that are in restructuring - just because they were not "persistently failing" enough to be in the bottom 5%, they are not eligible for these funds and will have to remain in restructuring status while implementing somewhat similar restructuring actions. As these Tier I and II schools exit their improvement status immediately (and with the benefit of receiving 1003(g) funding as well), these other restructuring schools will be singled out that much more as schools in restructuring. This does not accurately reflect these schools' conditions within the DC context, and when therefore looking at DC as a whole with all of its

LEAs, this waiver would have disproportionately damaging effects on these schools (both DCPS and charter schools), negating any gains received by the Tier I and II schools.

4. OSSE's justification for the waiver does not outweigh these potential costs.

OSSE has presented that one reason for this waiver is to allow turnaround schools to implement their improvement strategies without the "stigma" of being a school in improvement status. This reasoning, however, potentially does not hold water and does not in any case outweigh the problems detailed above, particularly because it will be mostly, if not nearly all, DCPS schools that receive these funds. Although students in DC can choose to attend a charter school, in reality, DCPS schools are often the single viable choice for those students -- a truly high performing charter may not be located close enough for that student to be able to travel to it on a daily basis, particularly when you consider that most charters serve only a short range of grades (5-8, 1-4, 9-11, etc) because they are either still growing or have only chosen to serve those grades. For a full K-12 education then, often times the "default" solution of a DCPS school is the only realistic choice for a student. All this is to say that the "stigma" of being a school in improvement status will likely NOT keep significant numbers of students or teachers or principals away from a DCPS school, either for its education, job prospects, or in this case, efforts to implement real change (such a stigma would in fact affect charters much more). In fact, the fact that a school is receiving these funds (up to \$2 million) and is the target of such drastic change measures and innovative improvement efforts will likely ATTRACT teachers and principals - if properly advertised - or at least those who would be the ones schools would want in their schools during this improvement effort. And again, by resetting the improvement calendar for that school, OSSE would be removing a strong lever for urgent reform, allowing the status quo at that school, squandering this wonderful opportunity and source of funds.

To be clear, this is NOT an argument that schools that are persistently failing and in that bottom 5% should not receive these funds exclusively! Despite the fact that the funds will mostly go to DCPS schools and despite our affiliation with a charter LEA, we believe strongly that such funds should in fact be funneled towards those schools that are persistently failing, to give them the strongest chance of improving and turning around their schools and improving education here in DC overall. However, the waiver being proposed undermines both the improvement efforts and the situation for all other LEAs (particularly charters, who will not see a significant amount of these 1003g funds). These 1003(g) funds are significant and present an exciting opportunity to truly bring about great change in those schools receiving those funds. At the same time, the ability to receive up to \$2 million dollars SHOULD carry with it some high stakes and some urgent timelines for actual improvements. By allowing them to reset their improvement calendars, this waiver to negate both the high stakes AND the urgency that should go with these funds. There would be very little accountability with how those schools would be run - the unfortunate truth is that without such a strong stick/lever, there is a good chance that these significant funds would instead continue to fund the status quo and would simply be more money for DCPS schools to access that charters cannot. If schools that receive 1003(g) funds cannot bring about immediate change and improvement, there should be consequences for those schools - and those consequences would be removed by this waiver. Given the other contradictions and complications detailed above, we would urge OSSE to omit this waiver from its application.



Local Educational Agency Application for School Improvement Grants
 Provided Under Section 1003(g) of the Elementary and Secondary Education Act of 1965, as amended
 (Including Funds Provided by the American Recovery and Reinvestment Act of 2009 (ARRA))

The Office of the State Superintendent of Education (OSSE)



**Submit BOTH the completed Excel workbook AND a signed, scanned copy of the
 Applicant Information and Certification worksheet (tab i) to
 SIG.App@dc.gov by 5:00 P.M. EST on Friday, June 4, 2010.**

Early submissions are encouraged. Late submissions will not be considered.

Tab Title	
i	Applicant Information and Certification
ii	Assurances: Section 1003(g) School Improvement Funds
iii	Assurances: General Education Provisions Act
iv	Assurances: ARRA Reporting Schedule
v	Entire LEA: Consultation, Waivers, and Leading Indicators
vi	Entire LEA: Capacity to Serve
"A" tabs	Per School: Proposed Plan for School Improvement
"B" tabs	Per School: Explanations for Proposed Budget Items
"C" tabs	Per School: Proposed Annual Budgets
Ref1	Reference: School Improvement Grant Application Instructions
Ref2	Reference: Budget Category Definitions and Examples
Ref3	Reference: School Improvement Grant Guidance & Resources
Validation	Validation of Application's Readiness for Submission

You can navigate through this application workbook by selecting the desired worksheets at the left, except for "A," "B," and "C" worksheets. Navigate to those worksheets through the tabs at the bottom to provide the school plan/s. See Instructions for more information.