

Office of State Support (OSS) Monitoring Report

Highly Qualified Teachers And Improving Teacher Quality State Grants (ESEA Title II, Part A) Rhode Island Department of Education October 20-21, 2014

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Local Educational Agencies (LEAs) participating in the monitoring visit

1. Providence Public Schools
2. Exeter-West Greenwich Public Schools

Overview:

Number of LEAs: 34
Number of Schools: 296
Number of Teachers: 13,448

State Allocation (FY 2012)	\$11,493,668	State Allocation (FY 2013)	\$10,869,261
LEA Allocation (FY 2012)	\$10,809,796	LEA Allocation (FY 2013)	\$10,222,541
State Activities (FY 2012)	\$284,468	State Activities (FY 2013)	\$269,014
SAHE Allocation (FY 2012)	\$301,859	SAHE Allocation (FY 2013)	\$286,405
SEA Administration (FY 2012)	\$97,545	SEA Administration (FY 2013)	\$91,301
SAHE Administration (FY 2012)	\$17,391	SAHE Administration (FY 2013)	\$17,391

Scope of Review:

Like all State educational agencies (SEAs), as a condition of receiving funds under Title I, Part A and Title II, Part A of the Elementary and Secondary Education Act of 1965, as amended (ESEA), on the basis of its consolidated State application (§9302(b)), the Rhode Island Department of Education (RIDE) provided an assurance to the U.S. Department of Education (ED) that it would administer these programs in accordance with all applicable statutory and regulatory requirements. See §9304(a)(1) of the ESEA. These requirements include those in Title I, Part A that concern “highly qualified teachers” (HQTs) and those that govern the use of Title II, Part A funds. In addition, one of the specific requirements ED established for an SEA’s receipt of program funds on the basis of its consolidated State application was submission to ED of annual data on how well the State has been meeting its performance target for Performance Indicator 3.1: “The percentage of classes being taught by ‘highly qualified’ teachers (as the term is defined in §9101(23) of the ESEA), in the aggregate and in ‘high-poverty’ schools (as the term is defined in §1111(h)(1)(C)(viii) of the ESEA).” SEAs annually submit these data to ED in the consolidated state performance report.

ED’s monitoring visit to Rhode Island had two purposes. One was to review the progress of the State in meeting the ESEA’s highly qualified teacher requirements. The second was to review the use of ESEA Title II, Part A funds by the SEA, selected local educational agencies (LEAs), and the State agency for higher education (SAHE), to ensure that Title II, Part A funds are being used to recruit, prepare, and retain high-quality teachers and principals so that all children will meet a high academic achievement standard and achieve their full potential.

Summary of Monitoring Indicators

State Educational Agency				
Critical Element	Requirement	Citation	Status	Page
I.	The State must use procedures for identifying teachers as highly qualified that are consistent with the statutory definitions of HQT in the ESEA, §9101(23), and the Individuals with Disabilities Education Act (IDEA), §601(10).	ESEA §9101(23); IDEA §601(10)	Commendation	5
II.1.	The SEA ensures that all teachers hired	§1119(a)(2)	Met	N/A

State Educational Agency				
Critical Element	Requirement	Citation	Status	Page
	after the first day of the 2002-2003 school year to teach in Title I, Part A programs were highly qualified at the time of hire.		Requirements	
II.2.	The SEA ensures that all teachers paid with Title II, Part A funds for class size reduction are highly qualified.	§2123(a)(2)(B)	Met Requirements	N/A
II.3.	The SEA ensures that all LEAs that receive Title I, Part A funds notify parents of their right to request and receive information on the qualifications of their children's teachers.	§1111(h)(6)(A)	Finding	6
II.4.	The SEA ensures that all schools that receive Title I, Part A funds notify parents when their children are assigned to, or taught for four or more consecutive weeks by, a teacher who is not highly qualified.	§1111(h)(6)(B)(i)	Finding	6
III.A.1.	The SEA reports annually to the Secretary in the Consolidated State Performance Report (CSPR) the number and percentage of classes taught by highly qualified teachers, in the aggregate and in high- and low-poverty schools.	§1111(h)(4)(G)	Met Requirements	N/A
III.B.1.	The SEA has published an annual report card with the required information on the qualifications of the State's teachers.	§1111(h)(1)(C)(viii)	Finding	6
III.B.2.	The SEA has ensured that LEAs have published annual report cards with the required information on the qualifications of its teachers for both the LEA and each school it serves.	§1111(h)(2)(B)	Finding	7
IV.A.1.	After hold-harmless provisions are taken into consideration, the SEA allocated additional Title II, Part A funds to LEAs using the most recent Census Bureau data (found at http://www.census.gov/did/www/saipe/data/interactive).	§2121(a)	Met Requirements	N/A
IV.A.2.	The SEA has ensured that LEAs have completed assessments of local needs for	§2122(c)	Met Requirements	N/A

State Educational Agency				
Critical Element	Requirement	Citation	Status	Page
	professional development.			
IV.A.3.	To be eligible to receive Title II, Part A funds, LEAs must “submit an application to the State educational agency at such time, in such manner, and containing such information as the State educational agency may reasonably require.”	§2122(b)	Met Requirements	N/A
IV.B.1.	The SEA has ensured that LEAs maintain fiscal effort.	§9521	Met Requirements	N/A
IV.B.2.	The SEA has ensured that LEA funds do not supplant other, non-Federal funds.	§2123(b)	Met Requirements	N/A
IV.B.3.	The SEA and LEAs are audited in accordance with the Single Audit Act.	EDGAR §80.26	Met Requirements	N/A
IV.B.4.	The SEA monitors LEAs for compliance with Federal statutes and regulations, applicable State rules and policies, and the approved subgrantee Title II, Part A application.	EDGAR §76.770 and §80.40(a) (34 CFR §§76.770 and 80.40(a))	Met Requirements	N/A
IV.B.5.	The SEA ensures that LEAs comply with requirements with regards to services to eligible nonpublic schools.	§9501	Met Requirements	N/A
V.1.	The SEA expends Title II, Part A State-level activity funds on allowable activities.	§2113(c)	Met Requirements	N/A
V.2.	The SEA ensures that its use of State-level activity funds does not supplant other, non-Federal funds.	§2113(f)	Met Requirements	N/A
V.3.	The SEA provides equitable services to private school staff with State-level activity funds.	§9501	Finding	7

State Agency for Higher Education				
Critical Element	Requirement	Citation	Status	Page
1.	The SAHE manages a competition to award subgrants to carry out appropriate professional development activities.	§§2132 and 2133	Recommendations	7
2.	The SAHE works in conjunction with the SEA (if the two are separate agencies) in its award of Title II, Part A subgrants.	§2132(a)	Met Requirements	N/A
3.	The SAHE awards subgrants only to eligible partnerships that include at least	§2131	Met Requirements	N/A

	an institution of higher education (IHE) and the division of the IHE that prepares teachers and principals; a school of arts and sciences; and a high-need LEA.			
4.	The SAHE ensures that each partnership awarded a subgrant engages in eligible activities.	§2134	Met Requirements	N/A
5.	The SAHE has procedures in place to ensure that no single partner uses more than 50 percent of subgrant funds.	§2132(c)	Met Requirements	N/A
6.	The SAHE monitors subgrantees for compliance with Federal statutes and regulations, applicable State rules and policies, and the approved sub grantee application.	EDGAR §76.770 and §80.40(a) (34 CFR §§76.770 and 80.40(a))	Finding	7

Area I: HQT Definitions and Procedures

Critical Element I: The State must use procedures for identifying teachers as highly qualified that are consistent with the statutory definitions of HQT in the ESEA, §9101(23), and the Individuals with Disabilities Education Act (IDEA), §601(10).

Citation: ESEA §9101(23); IDEA §601(10)

Commendation: In 2012–13, RIDE implemented a new data collection system called, “Personnel Assignment System (PAS).” This real-time system, used by local education agencies (LEAs) to report to the State the work assignments of educators and administrators, only allows specific classroom assignments for educators and administrators based on their certificates. Thus, when an educator is not certified appropriately for a teaching assignment, the system flags the assignment as “Out of Area”—and thus not one in which the teacher is highly qualified—and alerts the LEA to take steps to rectify it. This allows RIDE to monitor the districts where educators are flagged as “Out of Area.” The PAS system works in tandem with RIDE’s online educator certification system, called “eCert.” These systems work together to determine the HQ status of teachers. These two connected systems allow for seamless access to educator certification and HQT status data. They also allow districts and RIDE access to verify educator certification and HQ status in real-time.

Area II: HQT Data Reporting and Verification

Critical Element II.3: The SEA ensures that all LEAs that receive Title I, Part A funds notify parents of their right to request and receive information on the qualifications of their children’s teachers.

Citation: ESEA §1111(h)(6)(A)

Finding: Though RIDE provides guidance that all LEAs that receive Title I funds notify parents of their right to request and receive information on the qualifications of their children’s teachers, and though all districts with whom the review team met were ensuring that their schools adhered to this requirement, RIDE could not ensure that all LEAs do so. The Title II, Part A team does not review or monitor this requirement. Rather, the RIDE team noted that this is a Title I, Part A responsibility. However, the RIDE team was not able to provide evidence that this oversight was occurring.

No Further Action Required: After the monitoring visit, RIDE submitted to ED an acceptable plan for ensuring that all LEAs in Rhode Island that receive Title I, Part A funds notify parents of their right to request and receive information on the qualifications of their children’s teachers.

Critical Element II.4: The SEA ensures that all schools that receive Title I, Part A funds notify parents when their children are assigned to, or taught for four or more consecutive weeks by, a teacher who is not highly qualified.

Citation: ESEA §1111(h)(6)(B)(ii)

Finding: Though RIDE provides guidance that to LEAs that all schools that receive Title I, Part A funds must notify parents when their children are assigned to, or taught for four or more consecutive weeks by, a teacher who is not highly qualified, and though all LEAs whose staff the review team met were ensuring their schools adhered to this requirement, RIDE could not ensure that all LEAs have each school that receives Title I, Part A funds do so. The Title II, Part A team does not review or monitor this requirement. Rather, the RIDE team noted that this is a Title I responsibility. However, the RIDE team was not able to provide evidence that this oversight was occurring.

No Further Action Required: After the monitoring visit, RIDE submitted to ED an acceptable plan for ensuring that all public schools in Rhode Island that receive Title I, Part A funds notify parents when their children are assigned to, or taught for four or more consecutive weeks by, teachers who are not highly qualified.

Area III: HQT Data Reporting and Verification

Critical Element III.B.1: The SEA has published an annual report card with the required information on the qualifications of the State’s teachers.

Citation: ESEA §1111(h)(1)(C)(viii)

Finding: RIDE’s annual State report card was missing several required elements, including the percentage of classes in the State, and the percentage of classes in high- and low-poverty schools, taught by teachers who are not HQ, the professional qualifications of teachers, and the percentage of teachers on emergency or temporary licenses or credentials.

No Further Action Required: After the monitoring visit, RIDE provided ED with a written plan that contains specific procedures and a timeline for publishing an annual State report card that includes all required information about teachers, along with evidence that it is implementing this corrective action. In addition, RIDE corrected the current and previous years' State report card to include this required information.

Critical Element III.B.2: The SEA has ensured that LEAs have published annual report cards with the required information on the qualifications of its teachers for both the LEA and each school it serves.

Citation: ESEA §1111(h)(2)(B)

Finding: The LEA annual report cards were missing several required elements, including, the percentage of classes in high- and low-poverty schools taught by teachers who are not HQ, the professional qualifications of teachers, and the percentage of teachers on emergency or temporary licenses.

No Further Action Required: After the monitoring visit, RIDE provided ED with a written plan that contains specific procedures and a timeline for ensuring that LEAs publish annual report cards that include all required information about teachers, along with evidence that it has carried out this corrective action. In addition, RIDE corrected the current and previous years' State report card to include this required information.

Area IV: Administration of Title II, Part A

No findings.

Area V: Title II, Part A State-Level Activities

Critical Element V.3: The SEA provides equitable services to private school staff with State-level activity funds.

Citation: ESEA §9501

Finding: RIDE could provide no evidence that, as it plans the use of Title II Part A funds for State-level activities, it conducts timely and meaningful consultation with representatives of eligible nonpublic schools about the needs of private school educators, and Title II, Part A-funded equitable services that RIDE will provide to meet those needs. The State also did not provide information on use of State-level activity funds to provide equitable services to staff of eligible nonpublic schools.

Further Action Required: Within 30 business days of receipt of this report, RIDE must submit to ED a plan and a timeline detailing how, as it plans its use of Title II, Part A funds spent for State-level activities, it will conduct timely and meaningful consultation with representatives of

nonpublic schools on provision of equitable services to educators working in nonpublic schools. The plan must address how RIDE will properly determine the amount of State-level activity funds that RIDE will reserve for equitable services, and how, during the design and development of its use of State-level activity funds, it will have timely and meaningful consultation with representatives of private schools about the needs of private school educators, and services that RIDE will provide to meet those needs.

State Agency for Higher Education

Critical Element 1: The SAHE manages a competition to award subgrants to carry out appropriate professional development activities.

Citation: ESEA §§2132 and 2133

Recommendation: The SAHE should consider expanding its dissemination of the Request for Proposals to increase the number of proposals. The SAHE received only three applications for subgrants under its most recent competition, while in past years it received five. In addition, the SAHE should consider providing technical assistance to prospective applicants before the application deadline in order to provide information and assistance, answer inquiries, and increase the number and quality of the submitted proposals.

Recommendation: Due to reduction in key personnel, the SAHE did not issue the FY12 awards until March 2014. The SAHE should manage its competition in ways that to ensure the timely awarding of subgrants. Awarding grants in a timely fashion maximizes the time in which grantees have to plan and implement their programs.

Critical Element 6: The SAHE monitors subgrantees for compliance with Federal statutes and regulations, applicable State rules and policies, and the approved sub grantee application.

Citation: EDGAR §76.770 and §80.40(a) (34 CFR §§76.770 and 80.40(a))

Finding: SAHE officials and staff were unable to provide evidence that the SAHE is systematically monitoring subgrantees. Though the SAHE regularly conducts fiscal monitoring, it could not provide evidence that it conducts systematic programmatic monitoring for compliance with Federal statutes and regulations.

Further Action Required: The SAHE must submit to ED, within 30 business days of receipt of this report, a plan to ensure that the SAHE regularly and systematically monitors all grantees through an onsite or desk monitoring process.

Recommendation: The SAHE should create a written monitoring plan and protocols to ensure that all grantees are subject to an equitable and systematic monitoring process.

