

State of Vermont  
Department of Education

**ESEA Flexibility Proposal**

**THE PLAN**

*Our organizations work the way they work, ultimately, because of how we think and how we interact. Only by changing how we think, can we change deeply embedded policies and practices. Only by changing how we interact can shared visions, shared understandings, and new capacities for coordinated action be established.*

– Peter Senge

The following pages outline a general plan of action for redefining accountability in ways that compel learning in Vermont communities, using methods that are dynamic rather than static and insist on preparing all of our young people to face the challenges of the 21<sup>st</sup> century and beyond. We have organized our work around the following five action principles:

**1. Raising learning expectations for all students –**

- a. College and Career Ready State Standards (CCRSS) in all schools.
- b. Assessments meaningfully evaluate student learning gains towards achievement of CCRSS standards.
- c. State efforts focus available resources on schools and Supervisory Union/Districts (SU/Ds) demonstrating the lowest levels of – 1) student learning progress, 2) attainment, and 3) exposure to high quality personalized learning opportunities.
- d. High quality instruction is differentiated according to student need.

**2. Focusing on Early Learning –**

- a. Universal access to high quality early learning opportunities.
- b. Consistent evaluation of students' readiness for kindergarten.
- c. Consistent application (in Pre-K, K, grades 1, 2, & 3) of formative assessment and progress monitoring methods with evidence of closing identified learning gaps for students in reading and numeracy – applied across all students in all schools and aligned to the learning progressions in math and ELA that lead to CCRSS.

**3. Monitoring student progress and access to high quality education opportunities**

statewide by ensuring that the following elements are provided locally –

- a. Consistent access to a personalized learning environment that recognizes and attends to the diverse learning needs of and holds high expectations for all students.
- b. Consistent access to high quality local assessments for formative feedback and continuous progress monitoring of student learning and growth.
- c. Use of statewide summative assessment (grades 4, 6, 8), more comprehensive profile of student demographics and school needs as tools to highlight areas where additional supports are needed to assist teachers in meeting the needs of their students.
- d. Student access to internships, cooperatives, career interest planning, and college and work force readiness assessments that have value for them beyond high school (e.g.

- Accuplacer, SAT, ACT, Work Keys), so that they are more engaged in their learning and its relevance to fulfilling future goals and interests, and better informed and equipped to make decisions about their future.
- e. Student access to anywhere, anytime learning opportunities that go beyond the bounds of the school walls, but count toward their learning achievements and graduation.
  - f. Teacher and principal evaluation systems that consider the following:
    - i. Measures of teachers content knowledge
    - ii. Multiple Measures of student growth
    - iii. Multiple formal and informal observations
    - iv. Personal and peer assessments/reflection
    - v. Student perceptions of learning environment
    - vi. Teachers' perceptions of working conditions and support
4. **Employing data systems where teachers, principals, parents, students, and policy-makers can readily access information about how students progress** through the system and into the workforce and college. Use of that data to inform instructional decisions and educational developments that improve student success and access to opportunities.
5. **Focusing the Department of Education on providing guidance, support, and ensuring accountability for equitable access to high quality educational opportunities.**

This includes:

- a. Providing clear communication and guidance on the use of State Board Rule, Vermont Statute, and Federal Statute, as it relates to education;
- b. Supporting education leaders in applying common principles with locally nuanced execution toward commonly understood educational outcomes for all Vermont learners;
- c. Providing technical assistance on evidence based practice and flexible use of funds; ensuring easy access to valid and reliable data;
- d. Convening educators to provide training and support for continuously improving instruction and learning outcomes;
- e. Publicizing and celebrating school successes and innovation; and
- f. Informing state policy direction based on identified needs of students in schools throughout the state.

We are committed to preparing all students with the skills and abilities to pursue college and workforce directions of choice when exiting the K-12 system. In order to do this effectively, we need to reframe the paradigm of education accountability towards a system where all student learning matters and is evaluated for the benefit of the student and their family over time, where teaching is designed with a responsibility to student learning progress, have used the four principles articulated in the ESEA Flexibility Guidelines to identify specific challenges with the current system in Vermont and articulate methodologies to address or remove those challenges.

**1. COLLEGE AND CAREER READY EXPECTATIONS FOR ALL STUDENTS**

**Challenge:**

One of Vermont’s greatest achievement gaps is the gulf between the rate at which our students graduate and the rate at which they pursue post-secondary institutions following graduation. In 2008, for every 100 students who entered 9<sup>th</sup> grade, 86 graduated but only 41 went on to college. Historic trajectories indicate only 24 of those could be expected to complete a four year degree within 6 years (NCES 2008). While we know various factors beyond our control contribute to this, there is one element within our purview that is long overdue for revision. Vermont’s current graduation requirements, as defined by State Board of Education Rule do not require students be held to and supported in achieving high expectations for learning to attain graduation. In fact they are so ambiguous that students in sub-group populations are often tracked into programs of lower standard at local discretion.

Vermont’s current learning standards end at 10<sup>th</sup> grade, and do not currently define learning expectations which would adequately prepare a student to be college and career ready upon graduation. This leaves a potential void of preparedness for students during the last two critical years of high school. While some local school boards reconcile this disparity on their own, data on students attending Career and Technical Education centers and on special education students in particular, indicate that even when these more rigorous requirements are in place, they are frequently waived for students seen to be “less capable,” a decision often made by less than rigorous means.

**Vermont State Graduation requirements -**

A student meets the requirements for graduation if, at the discretion of each secondary school board:

- (1) the student demonstrates that he or she has attained or exceeded the standards contained in the Framework or comparable standards as measured by results on performance-based assessments; or
- (2) the student successfully completes at least 20 Carnegie units, including at minimum the following courses of instruction aligned with the Framework:
  - (a) four years of English language arts,
  - (b) three years of science,
  - (c) three years of mathematics,
  - (d) three years of civics, history and the social sciences, one year of which shall be in U.S. history and government,
  - (e) one year of the arts,
  - (f) one and one-half years of physical education; or
- (3) any combination of 1 and 2 above that demonstrates that the student has attained or exceeded the Framework or comparable standards.

Nothing herein shall be construed to prohibit a school board from establishing additional local graduation requirements.

**Strategies to Address Challenge:**

- A. Vermont has adopted Common Core College and Career Readiness Standards
  - i. August 2010, Vermont State Board of Education adopted Common Core College and Career Readiness State Standards in English Language Arts and Mathematics.
- B. Transitioning to Common Core College and Career Readiness Standards
  - i. Since then, DOE has worked with educators across the state and regionally to prepare for and implement the changes required to affect the necessary shifts in pedagogy and instruction in response to higher and deeper learning expectations across the K-12 spectrum. This work will continue through the next three years. The Common Core State Standards in mathematics and ELA will replace current Grade Expectations in those subject areas. The *Vermont Framework of Standards and Learning Opportunities* will be

revised in 2012 to ensure alignment with more comprehensive College and Career Readiness expectations across all Fields of Knowledge and Vital Results. Graduation requirements will be revised to reflect the rigor and engagement required for college and career readiness for all students. In line with Vermont's commitment to personalized learning and providing multiple pathways to graduation and college and workforce preparedness, new requirements will place more emphasis on desired student performance outcomes and competencies needed for 21<sup>st</sup> century preparedness aligned to the CCR expectations with less or no emphasis on seat time, location of learning, and Carnegie units/credit hours.

C. Develop and Administer Annual, Statewide, Aligned, High Quality Assessments that Measure Student Growth

- i. The Vermont State Board of Education Chair and Commissioner signed an MOU in 2010 for Vermont to be a governing state with the SMARTER Balanced Assessment Consortium (SBAC). Assessment development is under way and Vermont schools are expected to have access in the 2014/2015 school year, to formative, interim and summative assessments and end of course assessments in high school; all aligned with the Common Core State Standards. These evaluation tools will in large part be administered electronically, are individually adaptive and unconstrained by grade level, with significant accessibility and accommodations built in for all students. A digital library of formative tools and professional resources as well as interim assessments will be available on an ongoing basis for teachers. These resources will support the real time monitoring of student progress toward college and career readiness standards. Summative results will be available, individualized by student, class, grade, school, Supervisory Union/District and State, within 90 days.
- ii. Beginning in 2012/2013, Vermont proposes to use the ACCESS for ELLs English Language Proficiency test as an alternate assessment for English Language Learners (ELL) in the area of Reading/Language Arts. Developed by the WIDA Consortium of 28 states, ACCESS for ELLs measures proficiency in Reading, Writing, Speaking and Listening, and provides an overall English Language Proficiency scores, as well as literacy and oral language composites. Scale scores are reported along a continuum of seven proficiency levels, with level four (Expanding) considered to be the level where language proficiency no longer predicts academic achievement. For use in accountability, Vermont would use ACCESS scale scores for ELLs as correlated with NECAP scale scores on the regular statewide assessment. The percent of students at each proficiency level will also be reported. Once students reach scale scores equivalent to level four on the ACCESS for ELLs test they would be required to take the regular state assessment in English Language Arts.
- iii. Accommodations will be provided for students with special assessment needs as determined by their IEP (Individualized Education Plan as required by IDEA), and an alternate assessment will be provided for students with significant cognitive deficits whose skills cannot be measured accurately by the regular assessments, even with accommodations. For accountability purposes, annual reporting will include alternate assessment results in scaled scores and percent of students at each proficiency level.

- iv. In the spring of 2012, the DOE will establish a consistent Kindergarten Readiness Assessment to be administered for every child by the fall of 2013. This assessment will be appropriate for all subgroups and will provide teachers with data that inform instructional decisions.
- v. Also in the spring of 2012, the DOE will produce guidelines and protocols to be used by schools in implementing consistent formative assessment and progress monitoring systems for grades K, 1, 2, & 3 beginning in 2013. Most schools already use these methods and a review of models currently in use in Vermont schools will inform the development of guidelines to support continued use, annual reporting on progress by school, and efforts to scale implementation to include all Vermont schools. Formative resources from SBAC should become available in SY2012-13 which will inform the development of systems that monitor student progress toward more rigorous expectations of the CCRS.
- vi. In 2012/2013 and 2013/2014, NECAP will be administered in grades 4, 6 and 8 only.
- vii. In 2012/2013 and 2013/2014, all students in grade 10 will take Accuplacer to inform their current level of college readiness. All students in grade 11 will have the option to choose from an array of yet to be determined, rigorous assessments of college preparedness and industry certification, based on post-secondary aspirations (e.g. ACT or SAT and Work Keys or Industry Certifications and End of Course Assessments, etc.).
- viii. In 2012/2013, we will begin baseline data collection to inform student access and participation rates in high quality education opportunities such as dual enrollment, virtual learning, internships/cooperatives, capstone projects, rigorous coursework in mathematics and science, and individual portfolio development.

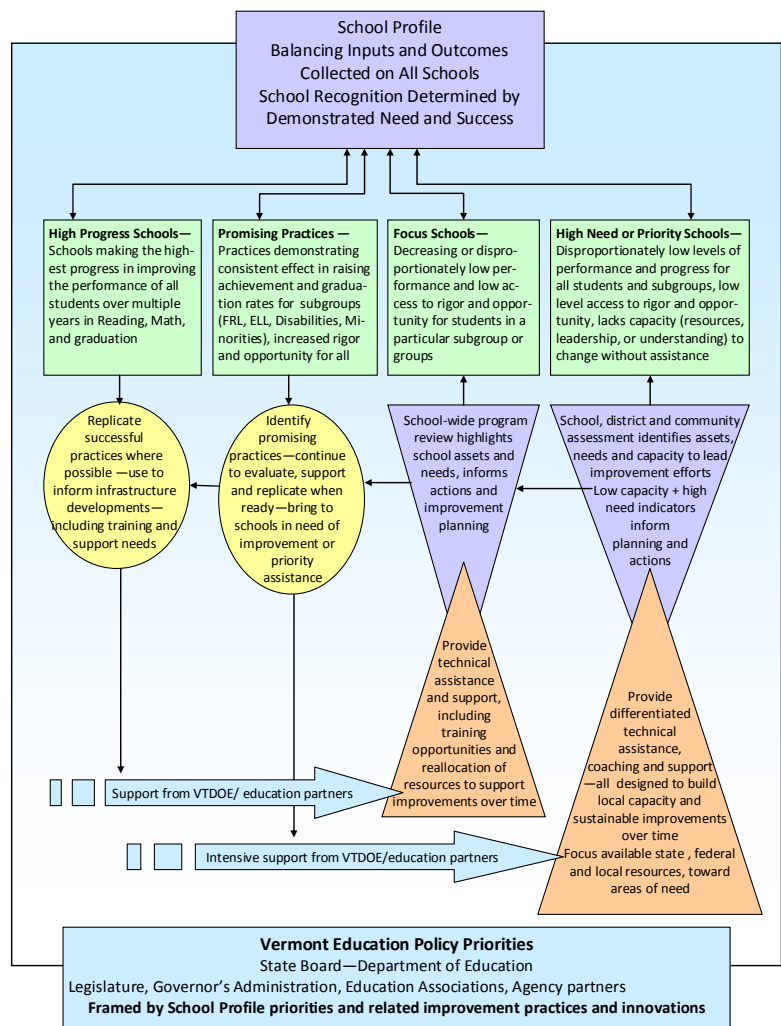
2. STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY AND SUPPORT

**Challenge:**

Undifferentiated, artificially high AYP targets create disproportionate numbers of “identified” schools. This overwhelms the system and makes it difficult to determine which schools actually need additional supports and assistance to improve. Additionally, Vermont’s current algorithm for making school progress determinations includes factors such as a high (compared to population demographics) minimum “n” of 40, wide confidence intervals, and other conditioning elements that result in decisions being withheld for many small schools or schools with less than 40 students in a particular subgroup. Based on our demographics, this has a significant effect on which schools are identified in need of priority assistance. This is further complicated by the allowance of variable “school” definitions, meaning depending upon school preference, in some schools, low high school outcomes are obscured when averaged in with higher performing elementary grade results. Predetermined, “one size fits all” federal and state sanctions and “required actions” make it difficult to provide flexibility and local context when articulating interventions designed to support improvement and growth.

**Strategies to Address the Challenge:**

- A. Moving forward, Vermont will use more straightforward methods to ensure all students and schools are included equally in the analysis of school progress and need. Schools facing exceptional circumstances will be identified as needed and addressed individually. Because high school performance levels in ELA and math tend to be significantly lower than those of K-8 grades, separate analysis will be provided for all “high schools” (9-12 grade spans).
- B. The diagram right is an overview of Vermont’s future system:
  - i. Spring 2012 – Vermont will no longer report AYP index scores or a list of “identified” schools.
  - ii. All schools will be given new baseline data derived from the results of fall 2011 NECAP testing. The baseline



will be in the form of average scale scores in reading and mathematics. As before, this data will be available for all students and disaggregated by gender, race, socio-economic, disability and ELL status. Instead of identifying schools as failing to make adequate yearly progress toward one uniform target, each school will be given their own new measurable objectives for student learning growth, against their own baseline. This is the data that will be reported for all schools.

Applying the measures described in the following sections, schools may be recognized as needing long range support (**priority**), intensive focus of resources and new and/or different resources to better address the needs of their student populations. Additionally, schools with one or more populations in need of significant attention will be required to develop a plan to more effectively focus available resources on the needs of those students (**focus**). Schools demonstrated to have made significant progress in addressing the needs of all students, including high need populations, will be recognized for their efforts (**reward**). All schools will be required to report annually – articulated data elements, progress toward goals as defined, and revisions as indicated to progress in their continuous improvement (**action**) plan.

For this first year of the new system, schools with the overall lowest 2010/2011 NECAP mean scale scores in reading or math for all students may be recognized as a high need or **priority** school. These schools will join the 10 existing Tier I and Tier II SIG schools in forming the first cohort of high need schools for purposes of State level intervention and support. Schools with subgroups (FRL, SWD, ELL) whose mean scale score for reading or math, or their four year cohort graduation rate is significantly lower than state average, may be part of the first cohort of **focus** schools for purposes of State level intervention and support targeted to those subgroups. Schools who are not recognized as a high need or **priority** school or a school with a need for intensive **focus** on one or more subgroups, and who are currently working under **required actions** including the parameters of formal restructuring plans will be expected to complete their work but will be removed from “identified” status and given a new baseline and targets for student learning and growth over the next six years. As mentioned above, Tier I and Tier II schools under the requirements of the SIG 2009 grant award, will continue to implement the transformation model as articulated in the scope of work for their SIG grant award. These 10 schools will be part of the first cohort of Priority schools as defined by ESEA flexibility guidelines. New priority and focus schools will be eligible to receive funds in March 2010 and in 2011, and 2012, under the new SIG 2010 grant award (once approved).

For all schools, spring 2012 will represent new baseline information derived from the 2011/2012 NECAP test results. Each school will be given new annual targets for the next six years (as defined in section C on Annual Measurable Objectives) in Reading/Language Arts, Mathematics, and graduation.

Over this and the next several years, Vermont will further develop additional indicators as described in the School Profile section below, to use in a matrixed approach to recognizing school focus needs.

VT DOE has been working with Center on Innovation and Improvement over the last 18 months in redesigning school improvement support efforts in ways that will apply a tiered approach to supporting all Vermont schools, but focus intensive resources on schools and students who need it most. We will continue to use the work of this group to inform further design of a differentiated system of support for continuous school improvement, including appropriate supports for addressing the needs of high priority sub groups. Particular attention will be paid to the **turn-around principles** (p. 14) as they are defined in the flexibility guidelines. An analysis of these principles has already been conducted and we find them to be consistent with the eight characteristics of highly effective schools as articulated by the Roots of Success (Vermont Department of Education, 2008) study, and the Global Best Practices Toolkit (2010) for high schools as developed with the New England Secondary School Consortium, and current research on rapid improvement strategies. This Statewide System of Support includes best practices in school improvement such as the use of effective data systems, strategic intensive technical assistance that guides SU/D coaching and leadership teams, school-wide improvement coaching certification, implementation of school-wide change models based on Response to Intervention (RTI) frameworks for improving academic and behavioral outcomes using a tiered approach to providing systemic supports universally throughout the school and SU/D, and community and family engagement. Most importantly, the Statewide System of Support approach recognizes that neither schools, nor state departments have the resources or capacity to do this work alone. Critical friends, such as education associations, institutions of higher education, education services agencies, interagency, business, and community partners must be engaged as well if we are to affect meaningful change and sustain high quality education offerings.

In January 2012, the Act 20 committee will publish recommendations for teacher and principal mentoring systems. In June 2012, the Educator Effectiveness Task Force will publish guidelines for schools to use in ensuring consistent application of teacher and principal evaluation systems that inform teacher and principal performance and development needs in relation to student growth and learning outcomes. DOE will work with the SBE and VSBPE to adopt these guidelines and will create technical assistance and training opportunities to support schools in implementing new evaluation practices. Information gleaned from the new evaluation systems will also be used to inform state and regional needs for professional development and will also inform in-state educator preparation programs and certification needs.

C. Ambitious but achievable **Annual Measurable Objectives** will be set for the **all students** group and for each **subgroup** (FRL, SWD, ELL, minorities) using the method described in Option A of the waiver guidance, with one exception: Vermont proposes to set targets using the average scaled score for each group rather than percent of proficient students, although percent proficient will also be reported (See “School Profiles”).

- i. There are two reasons for using scaled scores as the basic unit of analysis:
  - (1) Average scaled scores provide a more accurate estimate of where a group of students is actually performing across the achievement levels. For example, in one school the majority of students might score at the lower end of a particular achievement level, and in another the majority of students might score at the higher end of that achievement level. Using the percent proficient model, the two groups’ performance would appear to be identical, whereas, using average scaled scores the second group of students would appear quite accurately as the more proficient group.
  - (2) Scaled scores provide a more accurate estimate of individual student progress, and when aggregated, would represent the results of a school’s improvement efforts more accurately. For example, if results from two consecutive annual assessments show one student moving from the lower reaches of an achievement level across the line into the next level, and another student starts just below the line and advances across the line by the next year, those students’ progress should be treated differently in making accountability decisions, which would be the case if progress is documented with scaled scores. Using the percent proficient model, both students would have the same weight in accountability. The scaled score method is particularly appropriate for traditionally low scoring groups, such as Free and Reduced Lunch eligible (FRL) students and Students with Disabilities (SWD), for whom percent proficient models often mask the effects of effective instruction and noteworthy student effort, because those students often start low and have considerable distance to travel to reach proficiency.

Rather than reducing by half the percentage of students in the **all students** group, and in each **subgroup**, Vermont proposes basing six-year targets on the increases in a group’s average scaled score necessary to cover half the distance from baseline to the proficient cut point. Annual Measurable Objectives would then be set by dividing the target into six equal scaled score units. Several examples follow:

Group	Average Scaled Score	Proficient Scaled Score*	Difference	6-Year Target (Difference/2)	AMO (Target/6)
All Students	28	40	12	6	1
Low SES Students	20	40	20	10	1.7
Students w/ Disabilities	18	40	22	11	1.8

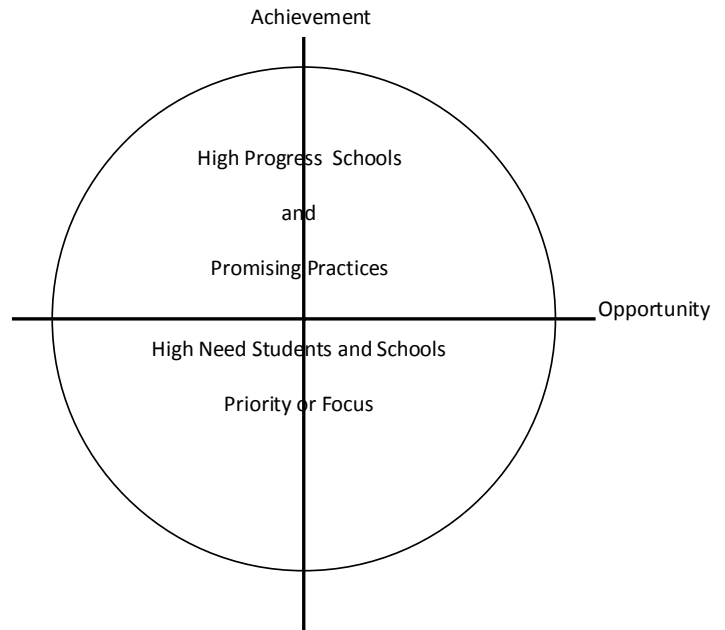
\* **NECAP** uses an 80 point scale, with the proficient cut for all content areas at all grade levels set at 40

Progress toward meeting 6-year targets, as well as supporting student and program improvement efforts, will be accomplished using the multiple measures summarized below:

		<b>School Year</b>						
		2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
<b>Assessment</b>	<b>NECAP Tests of Reading, Math and Writing</b>			→				
<b>Grade(s)</b>	3-8 & 11		4, 6 & 8	→				
<b>Purpose(s)</b>	School Recognition; Baseline Determination; Planning & Problem Solving	School Recognition; Student Growth; School Progress; Planning & Problem Solving	School Recognition; Student Growth; School Progress; Planning & Problem Solving					
<b>Assessment</b>			<b>TBD: SAT/ACT &amp; Work Keys - Industry Certs. End of Course NECAP/SBAC (Student Choice?)</b>	→				
<b>Grade(s)</b>			11/12	→				
<b>Purpose(s)</b>		Student readiness; School recognition; Baseline; Planning & Problem Solving	School Recognition; School Progress; Planning & Problem Solving					
<b>Assessment</b>			<b>Accuplacer College Readiness Assessment</b>					→
<b>Grade(s)</b>			10					→
<b>Purpose(s)</b>		Individual student college readiness						→
<b>Assessment</b>					<b>College and Career Readiness Assessment Test of ELA and Math</b>			→
<b>Grade(s)</b>					Annual Non-graded			→
<b>Purpose(s)</b>					School Recognition; Student Growth; School Progress; Planning and Problem Solving			→
<b>Assessment</b>	<b>Graduation Rates</b>							→
<b>Grade(s)</b>	12							→
<b>Purpose(s)</b>	School Recog.; Baseline; Planning and Problem Solving							→
<b>Assessment</b>	<b>Comprehensive School Profile</b>							→
<b>Grades</b>	PK - 12							→
<b>Purpose(s)</b>	Context; Planning and Problem Solving							→
<b>Assessment</b>			<b>Kindergarten Readiness Assessment</b>					→

		School Year						
		2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18
<b>Grades</b>			Kindergarten	_____	_____	_____	_____	_____▶
<b>Purpose(s)</b>			Early Intervention; Planning and Problem Solving	_____	_____	_____	_____	_____▶
<b>Assessment</b>				<b>Reading and Math Progress Monitoring</b>	_____	_____	_____	_____▶
<b>Grade(s)</b>				K-3	_____	_____	_____	_____▶
<b>Purpose(s)</b>				Intervention with individual Students; Public Reporting	_____	_____	_____	_____▶
<b>Assessment</b>	<b>Guided School Assessments</b>				_____	_____	_____	_____▶
<b>Grades</b>	PK – 12		_____	_____	_____	_____	_____	_____▶
<b>Purpose(s)</b>	Planning and Problem Solving; Root Cause Analysis		_____	_____	_____	_____	_____	_____▶

D. **School Profile** – Beginning in spring of the 2012/2013 school year, every Vermont school will receive critical achievement, demographic, and opportunity data back in the form of an interactive self-assessment tool designed to inform decision making about school improvement needs. Contents of the profile will build over the next three years to include the following: student demographic data which we already collect or produce, such as – age, race, gender, socio-economic status, and disability status; student achievement data for grades 4, 6, and 8 include scale scores and percent proficient for all students and subgroups in reading/language arts, math, science, and writing; all student and sub-group



performance in reading and math further articulated in the form of student gains over time, and gaps toward proficiency for each group; kindergarten readiness assessment results, and cohort graduation rates. Additional information collected will include – progress monitoring results in reading/language arts and math in grades 1, 2, and 3 for all students and sub-groups; cohort post-secondary transition rates, performance rates on high school assessments to include all assessments in the array as defined (options being considered include Accuplacer, ACT or SAT, and Work Keys or rigorous Industry Certifications, end of course assessments, NECAP/SBAC), for all students and subgroups. One of the four action teams being formed this spring will be charged with determining an appropriate array to ensure that all students will demonstrate the skills and knowledge necessary to be college and career ready. This goal will be accomplished within a system that values student engagement, practicality of administration, cost effectiveness, and meets any state or federal requirements. High priority will be given to options that also provide students with necessary post secondary credentials for entering college and/or the work force. Also included in the profile will be additional contextual education quality and opportunity data such as – Pre-K participation, student attendance, school climate information including discipline data and Youth Risk Behavior Survey outcomes, Educational Support Team data (number of students referred, with a plan and exiting a plan), Special Education data (number of students by disability, number of students referred, number of students with an IEP and exiting IEP, and percentages of students being educated in less restrictive environments), number of out of district placements and “alternative” day placements, teacher absence rates, highly qualified teacher status (ultimately to be replaced with teacher and leader effectiveness data), per pupil spending rates, and student participation rates in dual enrollment, AP courses, honors courses, virtual learning, internships and cooperatives, capstones, and rigorous secondary

coursework.

2012/2013/2014 - Schools will begin reporting results of kindergarten readiness surveys, progress monitoring results by grade in reading and math, and elements of baseline quality and opportunity data that are not already reported, as described above.

All schools will have this information and tools developed with the Center on Innovation and Instruction as resources to inform development of the statutorily required school **action plan** (Continuous Improvement Plan). These tools include Indistar, an online school improvement planning and evaluation process developed by the Center on Instruction and Improvement, tailored to Vermont context and priorities. The components of the school action plan will also be revised to reflect elements of currently required School Quality Standards and/or newly defined Education Quality Standards, and Educational Support Systems surveys so schools will not have to submit to three separate inquiries. Significant focus will be placed on the personalization of learning and increasing achievement, access to opportunity, and attainment for each student. As a form of monitoring this work, SU administrators will be required to submit annually to VTDOE, electronic copies of a summary of school action planning and SU/D administrative focus to assist schools in improvement efforts (currently this is required for SQS by State Board Rule and for ESS by statute, but does not an action plan – future reviews will be of the combined report including school and SU/D level actions and goals). DOE staff will review action plans with SU/D and school administrators annually and will use this information to guide state and regional support and intervention needs.

- i. 2012/2013, school/SU/D progress against student growth targets will be reported. Schools falling below the lowest performing threshold established by 2011/2012 baseline data could be recognized as high need for priority intervention and support and/or focus on specific sub group populations. Schools meeting progress targets will be recognized for their improvements. Schools making the most progress in improving all student performance in reading and math and in graduation rates may be recognized as high performing or high-progress schools.

#### E. REWARD SCHOOLS

- i. Vermont school personnel have commented that a formal state recognition of achievement and progress would be welcomed not only by them but by their local communities. When appropriate, Vermont will honor both **highest performing** and **high progress** schools, through a state level recognition involving the governor's office, the legislature, the State Board of Education and the State Department of Education. Additionally, DOE will create opportunities for best practices and innovations to be shared statewide.
- ii. The DOE will make small grants available to schools recognized in this category. These grants will be designed to support educators in continuing to develop best practice and innovation in optimizing the learning experience.

## F. PRIORITY SCHOOLS

### Process for Recognizing Priority Schools – in Year 1

The determination of which schools would be considered Tier I schools for eligibility for the 2011 SIG funds will be made using the methodology for identifying priority schools that will be submitted under Vermont's ESEA Flexibility Application. We are treating all 9-12 grade spans as a secondary school for purposes of determining priority. Using the most recent available assessment results from the New England Comprehensive Assessment Program (NECAP) we will identify Title I schools (including those secondary schools that are eligible but not receiving Title I) with the lowest average scale scores in reading and in math. We identify from the math and the reading rankings, the lowest achieving schools in each content area. Several of those schools are likely to be existing Tier I or Tier II schools; however, we will add the correct number of additional schools to achieve the 5% of the 235 eligible schools. This means that we will have at minimum, two additional schools joining the current Tier I and Tier II schools for a total of 12 priority schools. In addition, we reviewed our most recent graduation rates to confirm that we had no high schools with grad rates below 60% for all student group that would need to be added.

- i. For 2011/2012, schools with the overall lowest 2010/2011 NECAP average scale scores in reading and math for all students may be recognized as a high need or **priority** school. These schools will join the ten existing Tier I and Tier II SIG schools in forming the first cohort of high need schools for purposes of State level intervention and support.
- ii. Priority schools will:
  - Complete a guided self-evaluation aligned with the Turn-Around Principles;
  - Conduct root cause analyses for areas of weakness identified in the self-assessments;
  - Develop, in collaboration with a DOE Integrated Support for learning coordinator/team, a continuous improvement plan that addresses Turnaround Principles and is likely to result in rapid systemic change;
  - Clearly identify benchmarks of progress in meeting the goals of the plan;
  - Participate in on-going support for implementing the plan provided by VTDOE staff in collaboration with the Center on Innovation and Instruction and work with an external school improvement coach trained and supported by VTDOE to implement, monitor and report progress on the plan.

**Turnaround Principles:** *(as defined by USED)*

1. Providing strong leadership by: (1) reviewing the performance of the current principal; (2) either replacing the principal if such a change is necessary to ensure strong and effective leadership, or demonstrating to the DOE that the current principal has a track record in improving achievement and has the ability to lead the turnaround effort; and (3) providing the principal with operational flexibility in the areas of scheduling, staff, curriculum, and budget;
2. Ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and support systems and tied to teacher and student needs;
3. Redesigning the school day, week, or year to include additional time for student learning and teacher collaboration;
4. Strengthening the school's instructional program based on student needs and ensuring that the instructional program is research-based, rigorous, and aligned with State academic content standards;
5. Using data to inform instruction and for continuous improvement, including by providing time for collaboration on the use of data;
6. Establishing a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement, such as students' social, emotional, and health needs; and
7. Providing ongoing mechanisms for family and community engagement.

In keeping with Vermont's commitment to the often unique needs and priorities of our varied schools and communities, each school will establish interventions based on the profile that emerges from their specific comprehensive analysis. Efforts will ensure that classroom learning is aligned to the expectations of CCSS for all students.

The new planning process will eliminate some of the consequences outlined in Section 1116 of ESEA and related Vermont Statute and Commissioner's Required Actions, but will include consideration of all of the Turnaround principles (Roots of Success/Global Best Practices). The current school improvement planning document and the School Improvement Grant (SIG) process will provide guidance to the development of the continuous improvement process, and analysis and planning documents.

## G. FOCUS SCHOOLS

### Process for Recognizing Focus Schools – in Year 1

To identify those schools that will be considered Vermont's focus schools, we will look at the subgroups with the lowest scale scores in reading or in math or the lowest percent of graduating students for the 9-12 grade span. Based on an "n" of 11, our minimum number for public reporting, the lowest achieving subgroups in Vermont are SWD (students with disabilities); FRL (students on free and reduced lunch) and in a handful of schools ELL (English language learners). Please note, minority groups did not exceed the minimum "n" of 11 and would be personally identifiable if reported.

In order to ensure that we have addressed the very lowest achieving subgroups across these three categories, we will pro-rate the required 10% of the 235 Title I schools. Since 10% would be 24 schools (rounded up), we will identify the ten schools with the lowest achieving SWD subgroups, in reading or in math; the ten schools with the lowest achieving FRL subgroups, in reading or math; two schools with the lowest achieving ELL subgroups in those categories and two schools with the lowest graduation rate for any of the three subgroups. It is important to note that several of our priority schools include significant populations of ELL students

- i. Schools with the widest gaps between subgroups average scale score, lowest overall performance of a subgroup, or lowest overall four year cohort graduation rate, may be part of the first cohort of **focus** schools for purposes of State level intervention and support targeted to those subgroups.
- ii. Focus schools will complete a guided self-evaluation; conduct Root Cause analyses to better understand the reasons for low performance by students in one or more subgroups; develop a continuous improvement plan in collaboration with a DOE Integrated Support for Learning coordinator/team; clearly identify benchmarks of progress in meeting the goals of the plan; participate in on-going support for implementing the plan provided by DOE staff in collaboration with the Center on Innovation and Instruction; and, work with an external school improvement coach trained and supported by DOE to implement, monitor and report on progress on the plan. Plan development will be supported by a training institute and will include specific, differentiated interventions based on the needs identified through the particular school's self-assessment and root cause analysis of the significant gap(s). Efforts will ensure that classroom learning is aligned to the expectations of CCSS for all students.
- iii. DOE staff will identify practices aligned with the newly defined Turnaround Principles and practices for ELLS, SWDs and students in poverty that increase the quality of instruction and improve student achievement. Examples of these evidence-based interventions include:
  - Students with Disabilities: Co-teaching; Response to Intervention methods for behavior and academics; Professional Development for classroom teachers in Differentiated Instruction, assistive technologies;
  - Students of Poverty: School-based health services; partnerships with community health providers for parent education; early education programs and supports for children and parents, particularly in reading; 1:1 laptops or other access devices; tutoring, virtual learning opportunities, summer learning opportunities.
  - English Language Learners: District-wide welcome center programs for intensive language study and sheltered instruction; professional development for teachers in cultural competency; parent programs and outreach for school-community involvement and instructional practices known to be successful with ELL students.

The examples cited are just some examples that employ research-based effective practices. As noted in the section on priority schools, in keeping with Vermont's commitment to the often unique needs and priorities of our varied schools and communities, specific interventions that convey common high expectations for all students will be determined by each school's self-assessment and continuous improvement planning as they relate to the specifically identified area of need in that school's profile. Once determined, schools will have resources not only based on nationally and internationally recognized research and proven effective practices but will have access to collaboration in-state with schools that have implemented effective practices. Two examples of these possibilities are the following:

A cohort of elementary schools has been recognized for their achievements despite the challenge of extensive poverty in their communities. These schools represent a cross-section of Vermont elementary schools and are models for others in effectively addressing challenges to academic achievement. Individual schools confronting gaps in other areas such as language barriers, diversity issues and special needs populations have met with success in implementing specific strategies, providing models for work in these areas.

High schools face the same challenge of poverty as well as challenges of language, diversity and special needs populations. With a focus on addressing college and career ready goals, six schools have been recognized for leading the way in initiating innovative and proven strategies. These include the implementation of flexible pathways, personal learning plans, project-based learning and competency-based graduation, and accountability for preparing all students to be college and career ready.

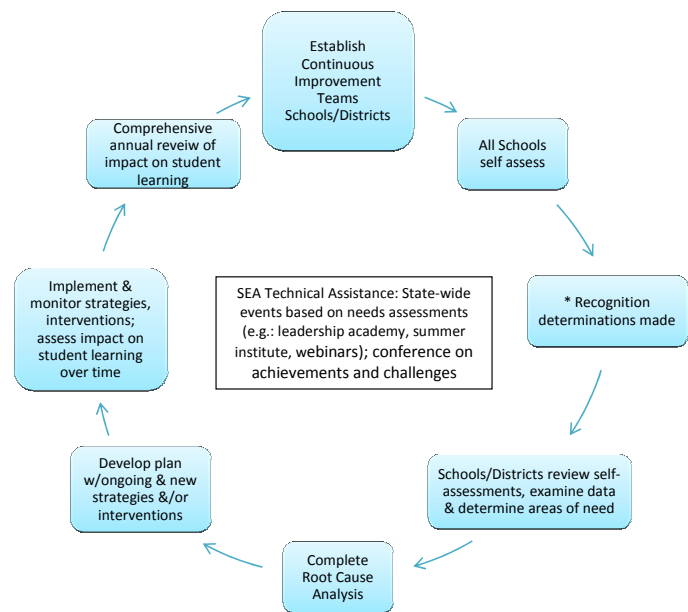
## **H. BUILD SEA, LEA AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING**

- i. The recent reorganization of the state Department of Education (DOE) included the establishment of the Integrated Support for Learning School divisions (Pre-K-8) and High School & Adult. This structure allows for greater flexibility and teaming options. Thus, teams can be configured and re-configured allowing personnel with specific expertise to move into and out of the basic team structure as needs warrant. This will be particularly helpful to our priority and focus schools. This group is currently finalizing a school improvement handbook and will be using the Pacesetters framework from the Center on Innovation and Instruction as one approach to support the school improvement needs of priority and focus schools.
- ii. Other areas of focus already under way at the DOE to support SU/D capacity building include structuring our work to interface with SU/D leadership teams rather than a previous approach which directly interfaced with schools, bypassing SU/D expertise and experience; providing training on the use of self-assessment, root cause analysis, and the creation of performance indicators and evaluation measures for school improvement; identifying evidence based practices aligned with characteristics of highly effective schools.

- iii. Additionally, we will need to define exit criteria for Priority and Focus schools. It is anticipated these will be tied to progress measures relative to each schools starting point.
- iv. This year the DOE provided funding to schools for contracting with a school improvement coach for their district (SU/D) improvement teams. Professional development occurred at the start of the year and ongoing webinars are providing training throughout the year. Based on what we have learned from this first initiative, the DOE school improvement teams, in conjunction staff at the Center on Innovation and Improvement will develop an extended definition of the coach role and coaching standards. This will include an articulation of the specific skills and competencies required of a coach serving in this capacity.

The DOE teams will collaborate with priority and focus schools throughout the continuous improvement process, providing technical support and monitoring progress with the school coach/DOE liaison. The coach/liaison will provide ongoing contact with the school and the DOE to ensure timely implementation and progress. SU/D's with priority and/or focus schools will be required to participate fully in the continuous improvement process with the DOE teams and coach/liaison to meet all goals articulated in their plans. In this way, SU/D's as well as individual schools will be accountable for progress and results.

**ESEA Waiver Principle II  
Overview of Continuous Improvement Process—DRAFT**



\*N.B.: SEA will collaborate with Priority/ Focus schools and an individual school coach/SEA liaison throughout the continuous improvement process until such time as these schools meet specified achievement targets. DOE will continue to support these schools through consultation as they continue the improvement process. For all schools that are not priority or focus schools the SEA will continue to be available for consultation..

Working with the Center on Innovation and Improvement, the DOE is implementing an Academy of Pacesetter Districts pilot this year to build capacity for SU/D leadership in the districts. The goals of the academy include increasing the capacity of the district central office to effectively support school improvement, including reallocation of resources to affect significant reform where that is required, in order to raise levels of student learning and demonstrated

achievement. This is being piloted in the 2011-2012 school year with a small number of districts and will be reviewed, revised as needed, and expanded in the next several years.

In addition to the commitment of DOE school improvement staff and resources to the development and implementation of the continuous improvement process, funds diverted to this effort will be used to build SU/D expertise (as noted above). Funds will also be used to support the mini-grants, technology and innovation opportunities as directly related to schools' targeted areas of improvement.

## I. DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

### **Challenge:**

Vermont currently has no consistent guidelines for teacher and principal evaluation systems. According to the DOE 2010 survey of all Superintendents and Principals, methods and principles, and frequency of evaluation vary widely across the state. Most principals and superintendents felt it would be beneficial to have consistent guidelines or protocols to be followed, leaving room for locally nuanced implementation and execution of said system. Research demonstrates the most critical element of student learning is the strength of the interaction between the teacher and the student, and strong leadership in principals is the key to a highly effective teaching workforce. We also know that teaching effectiveness goes beyond content knowledge and credit accumulation. Current federal requirements for highly qualified teacher status tied to seniority and level of education shows no correlation in Vermont to increased student learning and outcomes. More specifically, we know the connection between educator preparation, certification, induction, mentoring, development and evaluation is weak in our state and not self-reinforcing.

### **Strategies to Address Challenge:**

Vermont seeks to develop a system whereby in-state educator preparation programs reflect content knowledge and pedagogy that intersects with critical high leverage teaching practices (Teaching Works, University of Michigan, 2011), certification requirements reflect adequate preparation for effective teaching as we know it now (newly developed InTASC and ISLLC standards as adopted by the standards board in June 2011) and statewide guidelines exist for consistent practices in induction, mentoring, professional development and evaluation. For maximum effect, these components must be interconnected and applied systemically. For purposes of the waiver, Vermont is focusing largely on the element of teacher and principal evaluation as it relates to effectiveness, defined as creating a learning environment where student opportunity for learning is maximized through personalization, differentiation, and the provision of a culture of high expectations and systemic support for all learners. We recognize this is different than the way teachers have been traditionally prepared and it is incumbent upon us to provide teachers and principals with frequent meaningful feedback about their teaching and leadership practice, coupled with opportunities to grow and learn

themselves. Toward that end, the Vermont Educator Effectiveness Task Force was formed in April 2011 comprised of teachers, principals, superintendents, and members of the Vermont State Board of Education and Standards Board of Professional Educators, and the Vermont National Education Association. The following paragraphs briefly outline their purpose and timeline:

- A. This task force is made up of education stakeholders from across the state and meets on a monthly basis. The task force is studying best practices and research-based evaluation systems. Principles and Standards will be developed as the task force prepares its report due in June of 2012. The standards, as developed by the National Board for Professional Teaching Standards, are one example that will be reviewed as a part of this process. The task force believes that the ultimate purpose of teacher/leader evaluation is to improve teaching and learning. By using multiple measures in an effective evaluation system, teachers and leaders will inform their professional practice and in turn, improve student learning and student growth. A formative rather than summative approach has beneficial results in supporting growth in student achievement.

### **Educator Effectiveness Task Force Purpose:**

Develop statewide teacher/leader evaluation guidelines that include the following critical elements:

- Standards to measure teacher/leader effectiveness
- Valid and reliable methods of measurement
- Teacher/leader performance levels with descriptors for each of the levels
- Differentiated pathways for recognition, support and improvement
- Continuous monitoring, support and improvement of the evaluation system

Expected Outcome:

Prepare a document for State Board of Education and Standards Board of Professional Educators adoption that frames guidelines and protocols for effective teacher/leader evaluation systems

The task force has determined that effective teacher and principal evaluations must include evidence from practice, pedagogy, leadership ability, talent management and development including professional learning, mentoring, peer to peer collaboration around student learning, professional growth and contributions, and student learning and growth. A balanced evaluation would include:

- Measures of teacher's content knowledge
- Multiple measures of student growth
- Multiple formal and informal observations
- Personal and peer assessments/reflection
- Student perceptions of learning environment

- Teacher perceptions of working conditions and support

All members of the task force agree that effective evaluations must be carried out regularly by highly trained evaluators. Ongoing training for evaluators must be included in any meaningful evaluation system. Appropriate supports and resources are necessary in every school district. Accountability measures for teachers and leaders, when carried out appropriately, promote and support high quality educators at every level in the public schools. Vermont is committed to supporting its teachers and leaders and intends to attract and retain the best and the brightest for our public schools.

Currently, there are several Supervisory Union/District (s) piloting evaluation systems that incorporate the elements outlined above. At least nine of them are following the guidelines defined by the USED School Improvement Grant awarded them in 2010. These systems have been developed with teacher and principal participation and while following similar principals, are structured to reflect the culture and needs of their learning communities. Leaders in this work are part of the task force and have been presenting their work to the larger group. Additionally, several presentations from leading researchers and practitioners have been provided to the group. Currently, the Massachusetts model and the Kansas Educator Evaluation Protocol (KEEP) are both models that resonate with the group in terms of future direction for carrying out their purpose as articulated above.

High quality evaluation systems must be coupled with appropriate development opportunities provided in systemic fashion. These include mentoring for new educators and leaders and venues for professional learning that are differentiated to meet the learning needs of the educator and/or leader and the students with whom they interact. In addition to the evaluation system work described above, Act 20 established a legislative committee to make recommendations for Principal and Teacher mentoring systems. Their recommendations should be available in January 2012. Additionally, the DOE is seeking to fill a vacancy responsible for articulating and guiding a state-wide professional development plan connected to the use of Title IIA funds. This position will be charged with developing a blue-print for professional learning that addresses the current and future needs of Vermont educators and students.

Overall Timeline for Educator Effectiveness work:

January 2012 – Act 20 mentoring committee report due to the legislature.

June 2012 – the task force will publish State guidelines for SU/D's to use in developing evaluation systems for teacher and leader effectiveness.

August 2012 – SBE and VSBPE will review guidelines/protocols for adoption and if passed, incorporate in related rules and standards.

2012/2013 – SU/D’s will be required to submit plans for implementing evaluation systems consistent with published guidelines. DOE reviews and approves plans.

2013/2014 – SU/D’s pilot and revise evaluation systems as articulated in plans.

2014/2015 – SU/D’s implement evaluations for all teachers and principals. DOE supports and monitors implementation.

## J. REDUCING DUPLICATION AND UNNECESSARY BURDEN

Our plan for reducing duplication and unnecessary burden has several components:

1. Apply for a student Longitudinal Data System grant by December 15<sup>th</sup> in order to develop as much automation in the collection of data as possible, thereby once developed and implemented significantly reducing the reporting burden for schools;
2. Implement an internal Information Technology staff review resulting in a preliminary data consolidation proposal, based on multiple collections across the department, designed to create a less burdensome and duplicative process for reporting data. A report with recommendations will be completed and shared with the design team upon completion.
3. Initiate a complete review of DOE (data) collections with Data Owners and IT staff, and subsequently with all DOE staff. Once we have a comprehensive list we will post to the DOE web for field comment with a survey as well. The goal is to generate data about the timing of reports, suggestions for additional consolidation of reports, identification of priorities, and any other recommendations. The results of the survey will be shared with a representative stakeholder group to develop recommendations to help us prioritize our work. Additionally as the work proceeds for the development of a new system of accountability, new opportunities are emerging to consolidate and improve schools reports such as our education support system reports, and school action plans to create continuous self assessment tools with ongoing data entry and utilization.

## WAIVERS:

By submitting this flexibility request, the SEA requests flexibility through waivers of the ten ESEA requirements listed below and their associated regulatory, administrative, and reporting requirements by checking each of the boxes below. The provisions below represent the general areas of flexibility requested; a chart appended to the document titled *ESEA Flexibility Frequently Asked Questions* enumerates each specific provision of which the SEA requests a waiver, which the SEA incorporates into its request by reference.

- 1. The requirements in ESEA section 1111(b)(2)(E)-(H) that prescribe how an SEA must establish annual measurable objectives (AMOs) for determining adequate yearly progress (AYP) to ensure that all students meet or exceed the State's proficient level of academic achievement on the State's assessments in reading/language arts and mathematics no later than the end of the 2013–2014 school year. The SEA requests this waiver to develop new ambitious but achievable AMOs in reading/language arts and mathematics in order to provide meaningful goals that are used to guide support and improvement efforts for the State, LEAs, schools, and student subgroups.
- 2. The requirements in ESEA section 1116(b) for an LEA to identify for improvement, corrective action, or restructuring, as appropriate, a Title I school that fails, for two consecutive years or more, to make AYP, and for a school so identified and its LEA to take certain improvement actions. The SEA requests this waiver so that an LEA and its Title I schools need not comply with these requirements.
- 3. The requirements in ESEA section 1116(c) for an SEA to identify for improvement or corrective action, as appropriate, an LEA that, for two consecutive years or more, fails to make AYP, and for an LEA so identified and its SEA to take certain improvement actions. The SEA requests this waiver so that it need not comply with these requirements with respect to its LEAs.
- 4. The requirements in ESEA sections 6213(b) and 6224(e) that limit participation in, and use of funds under the Small, Rural School Achievement (SRSA) and Rural and Low-Income School (RLIS) programs based on whether an LEA has made AYP and is complying with the requirements in ESEA section 1116. The SEA requests this waiver so that an LEA that receives SRSA or RLIS funds may use those funds for any authorized purpose regardless of whether the LEA makes AYP.
- 5. The requirement in ESEA section 1114(a)(1) that a school have a poverty percentage of 40 percent or more in order to operate a schoolwide program. The SEA requests this waiver so that an LEA may implement interventions consistent with the turnaround principles or interventions that are based on the needs of the students in the school and designed to enhance the entire educational program in a school in any of its priority and focus schools, as appropriate, even if those schools do not have a poverty percentage of 40 percent or more.
- 6. The requirement in ESEA section 1003(a) for an SEA to distribute funds reserved under that section only to LEAs with schools identified for improvement, corrective action, or restructuring. The SEA requests this waiver so that it may allocate section 1003(a) funds to its LEAs in order to serve any of the State's priority and focus schools.

- 7. The provision in ESEA section 1117(c)(2)(A) that authorizes an SEA to reserve Title I, Part A funds to reward a Title I school that (1) significantly closed the achievement gap between subgroups in the school; or (2) has exceeded AYP for two or more consecutive years. The SEA requests this waiver so that it may use funds reserved under ESEA section 1117(c)(2)(A) for any of the State's reward schools.
- 8. The requirements in ESEA section 2141(a), (b), and (c) for an LEA and SEA to comply with certain requirements for improvement plans regarding highly qualified teachers. The SEA requests this waiver to allow the SEA and its LEAs to focus on developing and implementing more meaningful evaluation and support systems.
- 9. The limitations in ESEA section 6123 that limit the amount of funds an SEA or LEA may transfer from certain ESEA programs to other ESEA programs. The SEA requests this waiver so that it and its LEAs may transfer up to 100 percent of the funds it receives under the authorized programs among those programs and into Title I, Part A.
- 10. The requirements in ESEA section 1003(g)(4) and the definition of a Tier I school in Section I.A.3 of the School Improvement Grants (SIG) final requirements. The SEA requests this waiver so that it may award SIG funds to an LEA to implement one of the four SIG models in any of the State's priority schools.

## ASSURANCES:

By submitting this application, the SEA assures that:

- 1. It requests waivers of the above-referenced requirements based on its agreement to meet Principles 1 through 4 of the flexibility, as described throughout the remainder of this request.
- 2. It will adopt English language proficiency (ELP) standards that correspond to the State's college- and career-ready standards, consistent with the requirement in ESEA section 3113(b)(2), and that reflect the academic language skills necessary to access and meet the new college- and career-ready standards, no later than the 2013–2014 school year. (Principle 1)
- 3. It will develop and administer no later than the 2014–2015 school year alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State's college- and career-ready standards. (Principle 1)
- 4. It will develop and administer ELP assessments aligned with the State's ELP standards, consistent with the requirements in ESEA sections 1111(b)(7), 3113(b)(2), and 3122(a)(3)(A)(ii). (Principle 1)
- 5. It will report annually to the public on college-going and college credit-accumulation rates for all students and subgroups of students in each LEA and each public high school in the State. (Principle 1)
- 6. If the SEA includes student achievement on assessments in addition to reading/language arts and mathematics in its differentiated recognition, accountability, and support system and uses achievement on those assessments to identify priority and focus schools, it has technical documentation, which can be made available to the Department upon request, demonstrating that the assessments are administered statewide; include all students, including by providing appropriate accommodations for English Learners and students with disabilities, as well as alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities, consistent with 34 C.F.R. § 200.6(a)(2); and are valid and reliable for use in the SEA's differentiated recognition, accountability, and support system. (Principle 2)
- 7. It will report to the public its lists of reward schools, priority schools, and focus schools at the time the SEA is approved to implement the flexibility, and annually thereafter, it will publicly recognize its reward schools. (Principle 2)
- 8. Prior to submitting this request, it provided student growth data on their current students and the students they taught in the previous year to, at a minimum, teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in a manner that is timely and informs instructional programs, or it will do so no later the deadline required under the State Fiscal Stabilization Fund. (Principle 3)

- 9. It will evaluate and, based on that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools. (Principle 4)
- 10. It has consulted with its Committee of Practitioners regarding the information set forth in its request.
- 11. Prior to submitting this request, it provided all LEAs with notice and a reasonable opportunity to comment on the request and has attached a copy of that notice (Attachment 1) as well as copies of any comments it received from LEAs (Attachment 2).
- 12. Prior to submitting this request, it provided notice and information regarding the 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 website) and has attached a copy of, or link to, that notice (Attachment 3).
- 13. It will provide to the Department, in a timely manner, all required reports, data, and evidence regarding its progress in implementing the plans contained throughout this request.

**If the SEA selects Option A or B in section 3.A of its request, indicating that it has not yet developed and adopted all guidelines for teacher and principal evaluation and support systems, it must also assure that:**

- 14. It will submit to the Department for peer review and approval a copy of the guidelines that it will adopt by the end of the 2011–2012 school year. (Principle 3)