
ESEA Flexibility Request



Revised September 28, 2011

This document replaces the previous version, issued September 23, 2011.
(The document was formatted to ease usability on October 14, 2011)

U.S. Department of Education
Washington, DC 20202

OMB Number: 1810-0708
Expiration Date: March 31, 2012

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 1810-0708. The time required to complete this information collection is estimated to average 336 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.

TABLE OF CONTENTS: ESEA FLEXIBILITY REQUEST

Introduction	iii
General Instructions	iv
Table of Contents	1
Cover Sheet for ESEA Flexibility Request	3
Waivers	4
Assurances	6
Consultation	8
Evaluation	8
Overview of SEA’s ESEA Flexibility Request	8
Principle 1: College- and Career-Ready Expectations for All Students	9
Principle 2: State-Developed Differentiated Recognition, Accountability, and Support	11
Principle 3: Supporting Effective Instruction and Leadership	17
Sample Plan Template	19

INTRODUCTION

The U.S. Department of Education (Department) is offering each State educational agency (SEA) the opportunity to request flexibility on behalf of itself, its local educational agencies (LEAs), and its schools, in order to better focus on improving student learning and increasing the quality of instruction. This voluntary opportunity will provide educators and State and local leaders with flexibility regarding specific requirements of the No Child Left Behind Act of 2001 (NCLB) in exchange for rigorous and comprehensive State-developed plans designed to improve educational outcomes for all students, close achievement gaps, increase equity, and improve the quality of instruction. This flexibility is intended to build on and support the significant State and local reform efforts already underway in critical areas such as transitioning to college- and career-ready standards and assessments; developing systems of differentiated recognition, accountability, and support; and evaluating and supporting teacher and principal effectiveness.

The Department invites interested SEAs to request this flexibility pursuant to the authority in section 9401 of the Elementary and Secondary Education Act of 1965 (ESEA), which allows the Secretary to waive, with certain exceptions, any statutory or regulatory requirement of the ESEA for an SEA that receives funds under a program authorized by the ESEA and requests a waiver. Under this flexibility, the Department would grant waivers through the 2013–2014 school year, after which time an SEA may request an extension of this flexibility.

REVIEW AND EVALUATION OF REQUESTS

The Department will use a review process that will include both external peer reviewers and staff reviewers to evaluate SEA requests for this flexibility. This review process will help ensure that each request for this flexibility approved by the Department is consistent with the principles described in the document titled *ESEA Flexibility*, which are designed to support State efforts to improve student academic achievement and increase the quality of instruction, and is both educationally and technically sound. Reviewers will evaluate whether and how each request for this flexibility will support a comprehensive and coherent set of improvements in the areas of standards and assessments, accountability, and teacher and principal effectiveness that will lead to improved student outcomes. Each SEA will have an opportunity, if necessary, to clarify its plans for peer and staff reviewers and to answer any questions reviewers may have. The peer reviewers will then provide comments to the Department. Taking those comments into consideration, the Secretary will make a decision regarding each SEA's request for this flexibility. If an SEA's request for this flexibility is not granted, reviewers and the Department will provide feedback to the SEA about the components of the SEA's request that need additional development in order for the request to be approved.

GENERAL INSTRUCTIONS

An SEA seeking approval to implement this flexibility must submit a high-quality request that addresses all aspects of the principles and waivers and, in each place where a plan is required, includes a high-quality plan. Consistent with ESEA section 9401(d)(1), the Secretary intends to grant waivers that are included in this flexibility through the end of the 2013–2014 school year. An SEA will be permitted to request an extension of the initial period of this flexibility prior to the start of the 2014–2015 school year unless this flexibility is superseded by reauthorization of the ESEA. The Department is asking SEAs to submit requests that include plans through the 2014–2015 school year in order to provide a complete picture of the SEA’s reform efforts. The Department will not accept a request that meets only some of the principles of this flexibility.

High-Quality Request: A high-quality request for this flexibility is one that is comprehensive and coherent in its approach, and that clearly indicates how this flexibility will help an SEA and its LEAs improve student achievement and the quality of instruction for students.

A high-quality request will (1) if an SEA has already met a principle, provide a description of how it has done so, including evidence as required; and (2) if an SEA has not yet met a principle, describe how it will meet the principle on the required timelines, including any progress to date. For example, an SEA that has not adopted minimum guidelines for local teacher and principal evaluation and support systems consistent with principle 3 by the time it submits its request for the flexibility will need to provide a plan demonstrating that it will do so by the end of the 2011–2012 school year. In each such case, an SEA’s plan must include, at a minimum, the following elements for each principle that the SEA has not yet met:

1. Key milestones and activities: Significant milestones to be achieved in order to meet a given principle, and essential activities to be accomplished in order to reach the key milestones. The SEA should also include any essential activities that have already been completed or key milestones that have already been reached so that reviewers can understand the context for and fully evaluate the SEA’s plan to meet a given principle.
2. Detailed timeline: A specific schedule setting forth the dates on which key activities will begin and be completed and milestones will be achieved so that the SEA can meet the principle by the required date.
3. Party or parties responsible: Identification of the SEA staff (*e.g.*, position, title, or office) and, as appropriate, others who will be responsible for ensuring that each key activity is accomplished.
4. Evidence: Where required, documentation to support the plan and demonstrate the SEA’s progress in implementing the plan. This *ESEA Flexibility Request* indicates the specific evidence that the SEA must either include in its request or provide at a future reporting date.
5. Resources: Resources necessary to complete the key activities, including staff time and additional funding.

6. **Significant obstacles:** Any major obstacles that may hinder completion of key milestones and activities (e.g., State laws that need to be changed) and a plan to overcome them.

Included on page 19 of this document is an example of a format for a table that an SEA may use to submit a plan that is required for any principle of this flexibility that the SEA has not already met. An SEA that elects to use this format may also supplement the table with text that provides an overview of the plan.

An SEA should keep in mind the required timelines for meeting each principle and develop credible plans that allow for completion of the activities necessary to meet each principle. Although the plan for each principle will reflect that particular principle, as discussed above, an SEA should look across all plans to make sure that it puts forward a comprehensive and coherent request for this flexibility.

Preparing the Request: To prepare a high-quality request, it is extremely important that an SEA refer to all of the provided resources, including the document titled *ESEA Flexibility*, which includes the principles, definitions, and timelines; the document titled *ESEA Flexibility Review Guidance*, which includes the criteria that will be used by the peer reviewers to determine if the request meets the principles of this flexibility; and the document titled *ESEA Flexibility Frequently Asked Questions*, which provides additional guidance for SEAs in preparing their requests.

As used in this request form, the following terms have the definitions set forth in the document titled *ESEA Flexibility*: (1) college- and career-ready standards, (2) focus school, (3) high-quality assessment, (4) priority school, (5) reward school, (6) standards that are common to a significant number of States, (7) State network of institutions of higher education, (8) student growth, and (9) turnaround principles.

Each request must include:

- A table of contents and a list of attachments, using the forms on pages 1 and 2.
- The cover sheet (p. 3), waivers requested (p. 4-5), and assurances (p. 5-6).
- A description of how the SEA has met the consultation requirements (p. 8).
- An overview of the SEA’s request for the ESEA flexibility (p. 8). This overview is a synopsis of the SEA’s vision of a comprehensive and coherent system to improve student achievement and the quality of instruction and will orient the peer reviewers to the SEA’s request. The overview should be about 500 words.
- Evidence and plans to meet the principles (p. 9-18). An SEA will enter narrative text in the text boxes provided, complete the required tables, and provide other required evidence. An SEA may supplement the narrative text in a text box with attachments, which will be included in an appendix. Any supplemental attachments that are included in an appendix must be referenced in the related narrative text.

Requests should not include personally identifiable information.

Process for Submitting the Request: An SEA must submit a request to the Department to receive the flexibility. This request form and other pertinent documents are available on the Department’s Web site at: <http://www.ed.gov/esea/flexibility>.

Electronic Submission: The Department strongly prefers to receive an SEA’s request for the flexibility electronically. The SEA should submit it to the following address:
ESEAflexibility@ed.gov.

Paper Submission: In the alternative, an SEA may submit the original and two copies of its request for the flexibility to the following address:

Patricia McKee, Acting Director
Student Achievement and School Accountability Programs
U.S. Department of Education
400 Maryland Avenue, SW, Room 3W320
Washington, DC 20202-6132

Due to potential delays in processing mail sent through the U.S. Postal Service, SEAs are encouraged to use alternate carriers for paper submissions.

REQUEST SUBMISSION DEADLINE

SEAs will be provided multiple opportunities to submit requests for the flexibility. The submission dates are November 14, 2011, a date to be announced in mid-February 2012, and an additional opportunity following the conclusion of the 2011–2012 school year.

TECHNICAL ASSISTANCE MEETING FOR SEAS

To assist SEAs in preparing a request and to respond to questions, the Department will host a series of Technical Assistance Meetings via webinars in September and October 2011.

FOR FURTHER INFORMATION

If you have any questions, please contact the Department by e-mail at ESEAflexibility@ed.gov.

TABLE OF CONTENTS

Insert page numbers prior to submitting the request, and place the table of contents in front of the SEA’s flexibility request.


CONTENTS		PAGE
Cover Sheet for ESEA Flexibility Request		3
Waivers		4
Assurances		6
Consultation		8
Evaluation		11
Overview of SEA’s ESEA Flexibility Request		11
Principle 1: College- and Career-Ready Expectations for All Students		13
1.A	Adopt college- and career-ready standards	13
1.B	Transition to college- and career-ready standards	14
1.C	Develop and administer annual, statewide, aligned, high-quality assessments that measure student growth	22
Principle 2: State-Developed Differentiated Recognition, Accountability, and Support		24
2.A	Develop and implement a State-based system of differentiated recognition, accountability, and support	24
2.B	Set ambitious but achievable annual measurable objectives	28
2.C	Reward schools	39
2.D	Priority schools	41
2.E	Focus schools	51
2.F	Provide incentives and supports for other Title I schools	63
2.G	Build SEA, LEA, and school capacity to improve student learning	68
Principle 3: Supporting Effective Instruction and Leadership		76
3.A	Develop and adopt guidelines for local teacher and principal evaluation and support systems	77
3.B	Ensure LEAs implement teacher and principal evaluation and support systems	80

TABLE OF CONTENTS, CONTINUED

For each attachment included in the *ESEA Flexibility Request*, label the attachment with the corresponding number from the list of attachments below and indicate the page number where the attachment is located. If an attachment is not applicable to the SEA’s request, indicate “N/A” instead of a page number. Reference relevant attachments in the narrative portions of the request.

LABEL	LIST OF ATTACHMENTS	PAGE
1	Notice to LEAs	
2	Comments on request received from LEAs (if applicable)	
3	Notice and information provided to the public regarding the request	
4	Evidence that the State has formally adopted college- and career-ready content standards consistent with the State’s standards adoption process	
5	Memorandum of understanding or letter from a State network of institutions of higher education (IHEs) certifying that meeting the State’s standards corresponds to being college- and career-ready without the need for remedial coursework at the postsecondary level (if applicable)	N/A
6	State’s Race to the Top Assessment Memorandum of Understanding (MOU) (if applicable)	
7	Evidence that the SEA has submitted high-quality assessments and academic achievement standards to the Department for peer review, or a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer review (if applicable)	N/A
8	A copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups (if applicable).	
9	Table 2: Reward, Priority, and Focus Schools	
10	A copy of any guidelines that the SEA has already developed and adopted for local teacher and principal evaluation and support systems (if applicable).	
11	Evidence that the SEA has adopted one or more guidelines of local teacher and principal evaluation and support systems	
12	Level 4/Priority School Redesign Plan Template	
13	[List additional attachments here]	

COVER SHEET FOR ESEA FLEXIBILITY REQUEST

Legal Name of Requester: Massachusetts Department of Elementary and Secondary Education	Requester's Mailing Address: 75 Pleasant Street Malden, MA 02148
State Contact for the ESEA Flexibility Request Name: Matthew Pakos Position and Office: Director, School Improvement Grant Programs Contact's Mailing Address: Massachusetts Department of Elementary and Secondary Education 75 Pleasant Street Malden, MA 02148 Telephone: 781-338-3507 Fax: 781-338-3318 Email address: mpakos@doe.mass.edu	
Chief State School Officer (Printed Name): Mitchell D. Chester, Ed.D.	Telephone: 781-338-3100
Signature of the Chief State School Officer:  X	Date: November 14, 2011
The State, through its authorized representative, agrees to meet all principles of the ESEA Flexibility.	

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.

Optional Flexibility:

An SEA should check the box below only if it chooses to request a waiver of the following requirements:

- The requirements in ESEA sections 4201(b)(1)(A) and 4204(b)(2)(A) that restrict the activities provided by a community learning center under the Twenty-First Century Community Learning Centers (21st CCLC) program to activities provided only during non-school hours or periods when school is not in session (*i.e.*, before and after school or during summer recess). The SEA requests this waiver so that 21st CCLC funds may be used to support expanded learning time during the school day in addition to activities during non-school hours or periods when school is not in session.

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)

CONSULTATION

An SEA must meaningfully engage and solicit input from diverse stakeholders and communities in the development of its request. To demonstrate that an SEA has done so, the SEA must provide an assurance that it has consulted with the State’s Committee of Practitioners regarding the information set forth in the request and provide the following:

1. A description of how the SEA meaningfully engaged and solicited input on its request from teachers and their representatives.

Massachusetts frequently reaches out to the state’s 80,000 educators on critical policy issues to gauge their perspective and viewpoint, and the development of the state’s Elementary and Secondary Education Act (ESEA) flexibility request was no different. In this case we received and incorporated feedback from teachers in several ways:

- We conducted a statewide survey of all our stakeholders, including teachers, to better understand which aspects of the No Child Left Behind Act (NCLB) were their highest priorities for us to pursue in our waiver. Our two state teacher associations notified their memberships about the survey opportunity, and we received a strong response from teachers. Out of the 5,038 survey respondents, 2,913 (58%) were teachers.
- We worked closely with the two state teacher associations to review drafts of our proposals and gather their feedback.

Nearly 96% of teacher respondents to the survey who offered an opinion recommended that we seek a waiver to provisions of the NCLB. Strong consensus emerged that the state should seek flexibility on the federal goal of 100 percent proficiency by 2014, the requirement to identify schools as in need of improvement, corrective action, or restructuring, and the interventions required under NCLB for schools that have an accountability status. Three-quarters of teacher respondents identified each of these issues as areas that were important or very important reasons to seek a waiver. Educators also voiced strong support for flexibility from public school choice and supplemental education services (SES) requirements.

This feedback was important confirmation that a waiver of NCLB provisions would be strongly supported by our state’s teachers and helped to reinforce that our initial thinking on this waiver request would be well aligned with the viewpoint of our educators. Once we had drafted an outline of our proposal, we posted it on the Massachusetts Department of Elementary and Secondary Education (ESE) website to allow members of the public to provide additional comment on the details of our plans. We received 45 separate comments, including one from an individual teacher.

In addition to these opportunities for teachers to provide input, we worked closely with state teacher union representatives to develop and modify our proposal based on feedback they had received. The Commissioner of Elementary and Secondary Education met with union

representatives and other key stakeholders on three separate occasions to inform them about the waiver opportunity and gather their suggestions and ideas. One of the two statewide teachers unions also provided written comment on the draft proposal, which helped to inform the final iteration of the state’s proposal.

As a result of these conversations, we feel confident that the state’s teachers agree with our belief that the consequences for low performance need to be closely tied to resolving the root causes of the problem and should intensify as the problems worsen. They also clearly agree with our proposal to align the types of interventions required for schools and districts identified through the accountability system with those described in our existing Conditions for School Effectiveness (see Principle 2 for details).

Educator feedback also helped us to clarify areas of our proposal that were too complex. Many responded that our original proposal for calculating annual measurable objectives (AMOs) and identifying priority, focus, and reward schools was not sufficiently transparent and potentially could be confusing to the field. As a result of this feedback we modified the calculation of AMOs and the way schools are assigned to accountability and assistance levels. Further changes to the proposal based on feedback from both teachers and members of the general public are described in the next section.

2. A description of how the SEA meaningfully engaged and solicited input on its request from other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations, and Indian tribes.

In addition to educators, we solicited input on our proposal from a diverse range of stakeholders and education advocacy organizations. To reach them we collaborated with partner organizations¹ to invite their members to participate in our statewide survey, resulting in the largest response we have ever received for a survey of this type. The detailed responses and ongoing feedback informed our thinking throughout the development of our waiver proposal.

In addition to the 2,913 responses from teachers, we received survey responses from 162 superintendents, 553 principals, 810 other education stakeholders (e.g., district Title I and Title II-A directors), 27 business leaders, 175 parents, 70 students, 132 people representing nonprofit, advocacy, and philanthropic organizations (including civil rights and community-based organizations), and 196 others. Beyond responding to multiple-choice questions, respondents generated 114 pages of written comments on the survey’s three open-ended questions.

¹ These included: state associations of school superintendents, school committees, elementary principals, secondary principals, charter schools, vocational schools, and teachers unions; statewide advocacy groups for English language learners, students with disabilities, students, parents, and the business community; and the philanthropic and nonprofit sector.

Later in the process, these groups were also contacted to provide comment on the draft proposal that we posted on our website. We received a total of 45 written comments, with the largest response from district staff members who manage federal grant programs such as Title I and 21st Century Community Learning Centers, and from nonprofit and advocacy groups.

Throughout the feedback process, we met with leaders of the statewide associations of superintendents, school committees, elementary and secondary principals, parents, vocational schools, charter schools and with the state’s urban superintendent network to gather their feedback firsthand, answer their questions, and provide them with updated information. We also offered our state Title I Committee of Practitioners three opportunities to discuss and comment on various iterations of our proposal, and we engaged with our Board-appointed Accountability and Assistance Advisory Council (AAAC).

Similar to what we learned from teachers, other stakeholders strongly encouraged the state to pursue a waiver of NCLB requirements. In all, 94 percent of those who offered an opinion said we should seek a waiver, and three-quarters or more felt that it was important or very important to seek a waivers from the current 100 percent proficiency goal, the identification of schools and districts for accountability status, and the consequences for identified schools and districts.

Stakeholder groups were remarkably consistent in their opinions; we saw very little variation across groups in their degree of support for a waiver or the types of provisions they felt we should include in our application. This served as important confirmation that we were on the mark with the broad outlines of our waiver proposal.

In both the survey and in various meetings with stakeholder groups, we asked for ambitious but attainable alternatives to the NCLB goal of 100 percent proficiency by 2014. Stakeholders strongly urged us to set targets that recognize that students need varying levels of support as they progress toward proficiency. Many asked that we include a measure of student growth, and that we focus primarily on indications that gaps are closing rather than on overall performance. Stakeholders also urged us to develop a system that no longer penalizes high performing schools for slight drops in performance, a frequent complaint about Adequate Yearly Progress (AYP). We have incorporated these ideas into our proposal.

As a result of this and other valuable feedback we focused our goals on closing proficiency gaps and reducing the proportion of students who are not college and career ready, and developed differentiated performance improvement targets for each subgroup. This input also reinforced our belief that including growth and performance in our new index of school progress and performance will be an effective way to measure progress and will create an incentive for schools to work toward college and career readiness for all students.

Stakeholders voiced broad support for our proposed intervention strategies, such as scaling

interventions based on the level of need and including a broader set of interventions or responses than those currently allowed under NCLB. Many also noted that parent and community engagement and supports aimed at meeting the social, emotional, and health needs of students have been long neglected in state and federal policy discussions and urged us to make them a key part of the menu of interventions available to priority and focus schools. We agree that these have great potential to improve student learning outcomes and have included them in our proposal. Further, district superintendents offered support for our proposal that districts may be offered greater flexibility in the use of federal funds in return for leveraging state and local revenue to implement high impact strategies such as extending the school day or year and establishing on-the-job, embedded teacher development and planning.

EVALUATION

The Department encourages an SEA that receives approval to implement the flexibility to collaborate with the Department to evaluate at least one program, practice, or strategy the SEA or its LEAs implement under principle 1, 2, or 3. Upon receipt of approval of the flexibility, an interested SEA will need to nominate for evaluation a program, practice, or strategy the SEA or its LEAs will implement under principles 1, 2, or 3. The Department will work with the SEA to determine the feasibility and design of the evaluation and, if it is determined to be feasible and appropriate, will fund and conduct the evaluation in partnership with the SEA, ensuring that the implementation of the chosen program, practice, or strategy is consistent with the evaluation design.

Check here if you are interested in collaborating with the Department in this evaluation, if your request for the flexibility is approved.

OVERVIEW OF SEA’S REQUEST FOR THE ESEA FLEXIBILITY

Provide an overview (about 500 words) of the SEA’s request for the flexibility that:

1. explains the SEA’s comprehensive approach to implement the waivers and principles and describes the SEA’s strategy to ensure this approach is coherent within and across the principles; and
2. describes how the implementation of the waivers and principles will enhance the SEA’s and its LEAs’ ability to increase the quality of instruction for students and improve student achievement.

Massachusetts has a long history of setting and maintaining high standards and expectations for all students and has worked hard to earn its current standing as the highest performing state in the nation. Our request for an Elementary and Secondary Education Act (ESEA) waiver is driven by the belief that our continued progress will be enhanced by the adoption of a unitary state/federal accountability system that: sets standards for student learning that ensure readiness for college and careers; calls out and remediates performance gaps; expects continuous improvement of schools and districts; rewards strong performance; and

aggressively addresses low performing schools and districts.

The Commonwealth's schools and districts are currently assessed based on both the state's five-level Framework for District and School Accountability and the requirements of the No Child Left Behind Act (NCLB). At one time both provided useful feedback, but NCLB's rising targets have made the metric no longer helpful in identifying schools and districts most in need of intervention. In 2011, the same year that Massachusetts led the nation in NAEP performance for the fourth time in a row, approximately 81 percent of our public schools and 90 percent of our districts were identified as not making Adequate Yearly Progress (AYP).

In contrast, Massachusetts' existing state system places schools and districts on a five-level scale, ranking the highest performing in Level 1 and lowest performing in Level 5. The strength of this accountability system is undergirded by the state's 2010 *Act Relative to the Achievement Gap*, which provides tools, rules, and supports for the state to aggressively engage with schools and districts in Levels 4 and 5.

The collective message of the Commonwealth and federal accountability systems increasingly generates greater noise than signal - as more and more schools and districts are being judged inadequate under AYP but not under the Massachusetts's tiered system.

Our proposal seeks to enhance the state system by establishing a new goal: to cut our state's proficiency gaps² in half by 2017, thus reducing by half the proportion of students who are not college and career ready. To measure progress toward our goal, we will set new annual targets for the state and each district, school, and subgroup to reduce proficiency and achievement gaps. We will also establish a new marker to identify schools and districts with the largest gaps in proficiency and achievement and will further differentiate interventions by accountability status. Taken together, these changes will allow us to support every school where students continue to struggle. In so doing we will create a system focused on college and career readiness that incentivizes continuous improvement in every corner of the Commonwealth.

The four principles for improving student academic achievement and increasing the quality of instruction detailed in this waiver opportunity are well-aligned with the statewide reform efforts we currently have underway. Already we have established a new statewide educator evaluation system, adopted new statewide curriculum frameworks incorporating the college- and career-ready Common Core State Standards, and implemented aggressive strategies for turning around our lowest performing schools and districts.

Reform has defined public education in Massachusetts for nearly two decades. While we have outpaced the nation and other countries in achievement, our work remains unfinished. This

² Thanks to Massachusetts Board of Elementary and Secondary Education member and chair of the Board-appointed Task Force on Proficiency Gaps Jeffrey Howard for establishing this use of the term "proficiency gap." See *A Roadmap to Closing the Proficiency Gap* (April, 2010): <http://www.doe.mass.edu/boe/news/0410PGRoadmap.pdf>.

waiver will provide us with the flexibility we need to halve our proficiency gaps by 2017, create the clear and coherent system of accountability necessary to aggressively address low performance, call out and remedy proficiency gaps, enable continuous improvement, and reward strong performance. The road forward is long but clear; the work will not be easy, but is critically important. The Commonwealth’s students deserve nothing less.

PRINCIPLE 1: COLLEGE- AND CAREER-READY EXPECTATIONS FOR ALL STUDENTS

1.A ADOPT COLLEGE- AND CAREER-READY STANDARDS

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<p>Option A</p> <p><input checked="" type="checkbox"/> The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that are common to a significant number of States, consistent with part (1) of the definition of college- and career-ready standards.</p> <p>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</p>	<p>Option B</p> <p><input type="checkbox"/> The State has adopted college- and career-ready standards in at least reading/language arts and mathematics that have been approved and certified by a State network of institutions of higher education (IHEs), consistent with part (2) of the definition of college- and career-ready standards.</p> <p>i. Attach evidence that the State has adopted the standards, consistent with the State’s standards adoption process. (Attachment 4)</p> <p>ii. Attach a copy of the memorandum of understanding or letter from a State network of IHEs certifying that students who meet these standards will not need remedial coursework at the postsecondary level. (Attachment 5)</p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

1.B TRANSITION TO COLLEGE- AND CAREER-READY STANDARDS

Provide the SEA’s plan to transition to and implement no later than the 2013–2014 school year college- and career-ready standards statewide in at least reading/language arts and mathematics for all students and schools and include an explanation of how this transition plan is likely to lead to all students, including English Learners, students with disabilities, and low-achieving students, gaining access to and learning content aligned with such standards. The Department encourages an SEA to include in its plan activities related to each of the italicized questions in the corresponding section of

the document titled *ESEA Flexibility Review Guidance*, or to explain why one or more of those activities is not necessary to its plan.

Overview

Success in today's economy requires a higher level of education than ever before, leaving students who graduate from high school unprepared for the rigor of college or careers unable to compete with their peers. Massachusetts has long made college and career readiness a top priority, and since 2007 has recommended that all high schools require students to complete MassCore, a minimum program of academic studies, before graduation to ensure their preparedness.

The Massachusetts Board of Elementary and Secondary Education (BESE) enhanced this recommended course of studies in 2010 when they adopted the *Common Core State Standards in Mathematics* and the *Common Core State Standards in English Language Arts and Literacy*. These evidence-based, internationally benchmarked standards are aligned with college and work expectations and were designed to provide the knowledge and skills that students need to succeed in entry-level, credit-bearing academic college coursework and workforce training programs. Following the adoption of the standards the state added some unique Massachusetts standards and features, including pre-kindergarten standards. In December 2010 the BESE and Board of Early Education and Care adopted the new *Massachusetts Curriculum Framework for Mathematics* and the *Massachusetts Curriculum Framework for English Language Arts and Literacy*, both of which incorporate the Common Core state standards and create a new alignment between early education and the K–12 system.³

Massachusetts Department of Elementary and Secondary Education (ESE) staff played a lead role on the writing teams that developed the Common Core State Standards to ensure that the new standards would be as academically rigorous and challenging as our prior standards, and worthy of adoption in Massachusetts. Now that the decision to adopt has been made, the state has begun a multi-tiered effort to ensure that educators are fully prepared to bring the new standards to life in the classroom. Plans are underway to revise the state's other curriculum frameworks (science and technology/engineering, history/social science, arts, comprehensive health, foreign languages) to incorporate literacy and mathematics standards where appropriate, transition to an assessment system aligned with the new standards, conduct outreach and professional development, and work with the Massachusetts Departments of Higher Education and Early Education and Care to create a system-wide, P–20 focus on college and career readiness.

Alignment

Prior to adopting the Common Core State Standards, ESE conducted several analyses to

³ These documents are posted at www.doe.mass.edu/frameworks/current.html. Minutes of the Board meetings are at www.doe.mass.edu/boe/minutes/10/0721reg.doc and www.doe.mass.edu/boe/minutes/10/1221reg.doc

measure the degree of alignment between the old and new standards. We found that in both mathematics and English language arts the standards were 90% aligned to our existing state standards; the additional depth in some areas found in the Common Core State Standards accounted for most of the difference. Massachusetts added some standards to the Common Core in the process of adopting its final curriculum frameworks, most notably a set of pre–K standards in both mathematics and English language arts. Massachusetts’ additions comprise 2.5% of the English language arts standards and less than 4% of the mathematics standards, well below the allowable 15 percent. Because of the state’s deep involvement in the standards development process and the strong alignment between the old and new Massachusetts frameworks, the transition will not be as complex as in other states.

In December 2010, ESE Curriculum and Instruction staff published crosswalks to indicate similarities and differences among the old and new standards.⁴ Districts are able to use these crosswalks to inform the alignment of their curriculum and instruction. ESE Student Assessment staff and the state’s assessment contractor used the crosswalks as the basis for analyzing the alignment of existing test items to the new standards.

Special Populations

The state’s college and career readiness aspirations extend to all students, including those who are in need of additional support due to a disability or because English is not their first language. To that end the state has prioritized the alignment of its English language proficiency standards and standards for students with disabilities.

Massachusetts’ English language proficiency (ELP) standards were last updated in 2006 and at that time were closely aligned to the state’s 2001 English language arts curriculum framework. To realign the ELP standards with the state’s new standards, ESE is currently finalizing a memorandum of understanding with the 27-state World-Class Instructional Design and Assessment (WIDA) consortium to use their English language development standards. The WIDA standards are aligned with the Common Core state standards, can be used by both English as a second language (ESL) and sheltered English immersion (SEI) content teachers, and address social and academic language development across the four language domains (reading, writing, listening, and speaking) in the major content disciplines. WIDA standards are assessed using the ACCESS (Assessing Comprehension and Communication to English State-to-State for English Language Learners) test, an assessment that measures student progress in acquiring the English language. The ACCESS assessment, an appropriate and strong replacement for the current Massachusetts English Proficiency Assessment, will be implemented in Massachusetts schools in the 2012–13 school year.⁵

We have also been working to analyze and implement the learning and accommodation factors necessary to ensure that students with disabilities will have the opportunity to meet and exceed the college- and career-ready standards. In 2006, ESE published Guides to the

⁴ www.doe.mass.edu/candi/commoncore

⁵ Documentation on the state’s decision to administer the ACCESS assessment: www.doe.mass.edu/boe/docs/0911/item4.html

Curriculum Frameworks in ELA, Mathematics, Science and Technology/Engineering, and History/Social Science for Students with Disabilities⁶. These will be updated in 2012 to align to the new Massachusetts Curriculum Frameworks for ELA/Literacy and Mathematics. This alignment project will be conducted with other states and university research centers through the alternate assessment consortium, the National Center State and Collaborative (NCSC), and will serve as a resource for other states throughout the country.⁷

Further, the content of our statewide teaching and learning system, described below, will be designed to promote tiered instructional strategies so that all students can access the content. The system itself will also allow educators to generate data from formative assessments so that they can monitor student learning more closely and identify problems early. As for accommodations, Massachusetts is leading the Partnership for the Assessment of Readiness for College and Career (PARCC) effort to develop a strategy for how students with disabilities will be accommodated in the assessment, using analysis of our existing accommodations to guide the work.

Outreach and Dissemination

ESE began dissemination of its new ELA/Literacy and Mathematics Curriculum Frameworks in January 2011 through conferences, professional development, and collaborative regional events held in the state colleges and universities and open to the P–20 education community. The highlights of this effort were regional sessions to introduce the new frameworks to teams of educators from early education, K–12 and higher education institutions. The transition to the new curriculum frameworks was also the featured theme of the state’s annual Curriculum and Instruction Summit, which was attended by more than 800 educators. At the request of the state’s superintendents, ESE also shipped more than 170,000 print copies of the new frameworks to districts so that individual teachers would have hard copies of the frameworks to use for their independent classroom alignment work.

Through its family literacy activities, ESE has begun to disseminate information using the Parents’ Guide materials developed on the Common Core standards for the National Parent Teacher Organization.⁸

In the future ESE’s annual Curriculum and Instruction Summits will continue to feature updated presentations on the new standards and assessments as well as new resources for college and career readiness. ESE is also partnering with the state Department of Early Education and Care to disseminate the standards to early childhood educators, with specific attention to family engagement strategies related to the frameworks.

⁶ Guides to the Curriculum Frameworks in ELA, Mathematics, Science and Technology/Engineering, and History/Social Science for Students with Disabilities: www.doe.mass.edu/mcas/alt/resources.html

⁷ Details of the alignment project being conducted the alternate assessment consortium, the National Center State and Collaborative (NCSC): www.cehd.umn.edu/nceo/projects/NCSC/NCSC.html

⁸ www.pta.org/ParentsGuide/

Supporting Massachusetts Educators

We recognize that the successful implementation of the state’s new standards rests largely on the ability of educators to translate them into strong local curricula and instructional practices. To that end we have launched multiple ways of supporting Massachusetts’ 80,000 educators as they get to know and understand the new standards and explore ways to teach to them effectively. Among these methods of support:

- In 2010–11 ESE developed instructional modules on key aspects of the new standards (e.g., math practices, algebra, writing, reading complex texts) and collaborated with professional development providers to align their coursework with the state’s college- and career-readiness standards in ELA and mathematics. These courses are a key strategy of the state’s Race to the Top initiative through 2014, and are open to all educators, including teachers of English language learners, low income students, and students with disabilities.
- In the spring of 2011, ESE launched a professional development initiative for approximately 300 educators on the design of model curriculum units and performance assessments based on the new standards. This project, which will continue through 2014, engages pre–k to 12 teachers in designing curriculum and assessment materials based on the new standards, the principles of Universal Design for Learning, and the structures of Understanding by Design. Participating teachers will begin pilot-testing these materials in classrooms in 2012, and the materials will eventually form a core component of the resources available in the Race to the Top-funded statewide teaching and learning system.
- Through the state’s six regional District and School Assistance Centers (DSACs), ESE is offering targeted courses on aspects of the new standards and on using data to inform instructional decisions to districts with low-performing schools.⁹ The state has also prequalified a cadre of vendors to provide a series of eight course modules for districts on using data effectively to improve classroom instruction. Race to the Top is funding the development of additional modules as well as the creation of online versions of each course to increase educator access to this high quality professional development opportunity.
- In the spring of 2012, Massachusetts will begin newly designed professional development for teachers of English language learners on second language acquisition, the new curriculum frameworks, and the WIDA standards. Professional development on the Massachusetts Tiered System of Support¹⁰ will be designed to support teachers, including teachers of students with disabilities and English language learners, to reach all students using the new standards.

⁹ www.doe.mass.edu/sda/regional/courses

¹⁰ www.doe.mass.edu/sped/mtss.html

- Because Massachusetts is a governing state of the Partnership for the Assessment of Readiness for College and Career (PARCC) consortium, ESE staff members have been active in the development of the PARCC Content Frameworks, guides for designing ELA and math curricula based on the Common Core standards. Published as working drafts in November 2011, these frameworks will be reviewed and revised as necessary over the next year. The PARCC Content Frameworks will serve as the basis of regional professional development available to all Massachusetts districts in the 2011–12 school year and beyond. This professional development will be focused both on raising awareness and understanding of the frameworks and on developing curricula that are based on the frameworks.
- Massachusetts educators will also participate in the PARCC Educator Cadres meetings, a series of regional meetings designed to allow educators to test the instructional tools and participate in professional development opportunities focused on the alignment of district curricula to the college- and career-ready standards.
- For principals and other administrators, Massachusetts offers extended training by the National Institute for School Leadership (NISL) using Race to the Top funding. This training includes components focused on the new college- and career-ready standards.¹¹
- ESE also uses its annual Curriculum Summits and superintendent and principal networks as a key strategy for supporting school leaders in the transition to the new standards.

Preparing New Educators

In addition to preparing veteran educators, it is critically important that newly licensed teachers be prepared for the heightened expectations that the new standards contain. ESE's Office of Educator Policy, Preparation and Leadership is working closely with the state's educator preparation program sponsoring organizations and the state's institutions of higher education to develop new program approval regulations to ensure that all programs produce highly effective educators who have a deep understanding of the content contained in the state's new curriculum frameworks. These new regulations will be brought to the Board of Elementary and Secondary Education for discussion and vote in winter 2012.

Following the adoption of the new regulations, in fall 2012 ESE will review and align its professional standards for teacher licensure with the new standards and indicators for teacher evaluation, which are linked to the state's curriculum frameworks. Taken together, these two regulatory changes will ensure that incoming teachers and administrative leaders are prepared to implement the new college- and career-ready standards in classrooms.

Instructional Materials

¹¹ www.doe.mass.edu/edleadership/nisl/

Massachusetts' effort to develop model curriculum units and performance assessments, as described above, will continue through 2014 and will engage pre-K to grade 12 teachers. The model units will be explicitly designed to support teaching and learning for all students, including English language learners, students with disabilities, low achieving students and students achieving at advanced levels.

By 2014, a minimum of 100 units for pre-K to grade 12 in mathematics, ELA, history/social science, and science and technology/engineering will be made available through the state's teaching and learning system, an online resource being built as part of the state's Race to the Top strategy. Massachusetts is also collaborating with Rhode Island and New York to expand the pool of high quality curriculum and assessment materials by including products from all three states; this expanded collection will also include units related to the arts.

Accelerated Learning Opportunities

Massachusetts is developing several new pathways to expand access to college-level courses and their prerequisites.

- Through Race to the Top, we have established six STEM Early College High Schools, and several other districts are pursuing this strategy through their own funding. The STEM Early College High School program creates partnerships between middle/high schools and local colleges and universities so that students complete a sequence of STEM-focused courses leading to the acquisition of between 12 and 30 college credits before high school graduation. This program prioritizes access for low income and first generation college students.
- Race to the Top is also funding a professional development program to prepare vertical teams of teachers to teach rigorous courses in middle and early high school that will prepare students to take AP courses and other college-level coursework in their later high school years. The program offers training in English language arts, mathematics, and sciences. Currently nearly 500 teachers are participating, and our state goal is to expand the program to 1,000 teachers.
- Our Commonwealth Dual Enrollment Program, run by the Department of Higher Education, enrolled over 1,600 high school students in 2009–10 in courses at local public colleges and universities each year, at no cost to the student. All 28 of our public institutions of higher education enroll students in the program, and 56% of public school districts enrolled at least one student in the program in 2009–10.

Transition to Next Generation Assessments

Massachusetts is a governing state in the Partnership for the Assessment of Readiness for College and Careers (PARCC) consortium, and Commissioner Mitchell Chester is the chair of the consortium's Board. PARCC is in the process of developing a common assessment aligned to the Common Core State Standards which is scheduled to be completed and ready to

administer in the 2014–15 school year. Massachusetts has committed to transitioning to this new assessment so long as it is determined to be as challenging as the Massachusetts Comprehensive Assessment system (MCAS), which is widely seen as one of the most rigorous and reliable statewide assessment systems in the country.

In the meantime, ESE plans to continue to administer MCAS and gradually transition the content between 2011–12 and 2013–14 to reflect the new English language arts and mathematics college- and career-ready standards. In 2011–12, the test will include some items based on the new standards; in 2012–13 the majority of assessment items will reflect the new standards, and in 2013–14 the entire MCAS ELA and mathematics assessment will be based on the new standards. This approach was carefully designed to ensure that students and their teachers are not unfairly penalized as they adjust to the new standards.¹²

In addition to transitioning items within the existing assessment format, ESE is currently developing curriculum-embedded performance assessments in ELA, mathematics, science, and history/social science and will conduct large-scale pilots of these performance assessments between 2012–13 and 2014–15.

Once PARCC is completed and the performance data demonstrate that the assessments are at least as comprehensive and rigorous as MCAS, we will transition fully from MCAS to the PARCC assessments. With the transition, we will establish a new set of performance targets and annual measurable objectives for our schools and districts.

Increasing Rigor

Beyond adopting college- and career-ready standards and preparing for the transition to next-generation assessments based on those standards, Massachusetts has taken several steps in recent years to better ensure that all students are prepared for college and careers.

A significant first step in this direction was the Board of Elementary and Secondary Education's endorsement of MassCore in 2007. This recommended high school program of studies includes four years of English language arts, four years of mathematics, three years of a lab-based science, three years of history, two years of the same foreign language, one year of an arts program and five additional core courses such as business education, health, and/or technology. MassCore also includes additional learning opportunities including AP classes, dual enrollment, a senior project, online courses for high school or college credit, and service or work-based learning. MassCore is not required, but districts are strongly urged to use the recommended coursework as a guide in setting their graduation requirements. In the 2010–11 school year approximately 72 percent of graduating seniors had completed the MassCore program of studies.

This recommended course of study was reinforced in spring 2011 when the state Board of Higher Education voted to require four years of high school mathematics for admission to its

¹² Details on the state's plan to transition its statewide assessment to reflect the new standards: www.doe.mass.edu/mcas/transition.

four-year colleges and universities. This requirement will impact students entering the state's higher education institutions beginning in fall 2016.

Beyond coursework, the state also established a graduation requirement to ensure that all students attained a minimum level of competency in English language arts, mathematics and science prior to receiving a high school diploma. From 2003 to 2008 all students were required to score a minimum of *Needs Improvement* on the grade 10 Massachusetts Comprehensive Assessment System (MCAS) English language arts and mathematics tests to earn the Competency Determination needed to receive a public high school diploma; the requirement was increased to *Proficient* in 2008. Students who score *Needs Improvement* are required to complete an Educational Proficiency Plan (EPP) in the specific subject area(s) in which they are not yet proficient in order to graduate. The EPP includes, for each subject (ELA, mathematics, science/technology/engineering) for which the student has not scored *Proficient* or higher on the high school MCAS:

- Documentation of the student's strengths and weaknesses based on MCAS and other assessment results, coursework, grades, and teacher input;
- Coursework the student will be required to take and successfully complete in grades 11 and 12 in the relevant content area(s); and
- Assessments the school will administer to the student annually to determine whether the student is making progress toward proficiency.

Coordination Across State Agencies

To be most effective, college and career readiness efforts need to start long before high school. Our state Executive Office of Education, established in 2008 to coordinate efforts across the three education agencies in Massachusetts, has made college and career readiness a priority. As a result, the Massachusetts Departments of Elementary and Secondary Education, Early Education and Care, and Higher Education are collaborating to make the transition to college- and career-readiness standards a birth-to-20 initiative for the Commonwealth.

Together, the three education agencies and the Executive Office are working on a range of efforts to create a seamless system of education that prepares even our youngest students for success after high school. These initiatives include:

- A streamlined P–20 data system that will allow educators to identify early the students who are off track and to track student progress throughout their educational careers;
- An online college planning tool¹³;

¹³ <http://www.yourplanforcollege.org/>

- An enhanced flow of data sent back to high schools about the college success of their graduates;
- The development of stronger preschool/K–12 alignment in curriculum, instruction and assessment;
- An online teaching and learning system that will provide access to high quality instructional and assessment materials and timely student data to all K–12 educators in public schools;
- Collaboration on birth to grade 3, parent education, and professional development initiatives; and,
- If funding for the Race to the Top Early Childhood grant is received, the development of kindergarten readiness assessments aligned to the new standards.

1.C DEVELOP AND ADMINISTER ANNUAL, STATEWIDE, ALIGNED, HIGH-QUALITY ASSESSMENTS THAT MEASURE STUDENT GROWTH

Select the option that pertains to the SEA and provide evidence corresponding to the option selected.

<p>Option A</p> <p><input checked="" type="checkbox"/> The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition.</p> <p>i. Attach the State’s Memorandum of Understanding (MOU) under that competition. (Attachment 6)</p>	<p>Option B</p> <p><input type="checkbox"/> The SEA is not participating in either one of the two State consortia that received a grant under the Race to the Top Assessment competition, and has not yet developed or administered statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</p> <p>i. Provide the SEA’s plan to develop and administer annually, beginning no later than the 2014–2015 school year, statewide aligned, high-quality assessments that measure student</p>	<p>Option C</p> <p><input type="checkbox"/> The SEA has developed and begun annually administering statewide aligned, high-quality assessments that measure student growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs.</p> <p>i. Attach evidence that the SEA has submitted these assessments and academic achievement standards to the Department for peer review or attach a timeline of when the SEA will submit the assessments and academic achievement standards to the Department for peer</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

	growth in reading/language arts and in mathematics in at least grades 3-8 and at least once in high school in all LEAs, as well as set academic achievement standards for those assessments.	review. (Attachment 7)
For Option B, insert plan here.		

PRINCIPLE 2: STATE-DEVELOPED DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

2.A DEVELOP AND IMPLEMENT A STATE-BASED SYSTEM OF DIFFERENTIATED RECOGNITION, ACCOUNTABILITY, AND SUPPORT

- 2.A.i Provide a description of the SEA’s differentiated recognition, accountability, and support system that includes all the components listed in Principle 2, the SEA’s plan for implementation of the differentiated recognition, accountability, and support system no later than the 2012–2013 school year, and an explanation of how the SEA’s differentiated recognition, accountability, and support system is designed to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Overview

The Commonwealth’s schools and districts are currently assessed based on both the state’s five-level Framework for District and School Accountability and the requirements of the No Child Left Behind Act (NCLB). Operating these dual systems at one time provided a wealth of valuable feedback, but the requirements under NCLB have declined into an administrative and fiscal burden that is no longer useful. The rising targets have resulted in far too many schools and districts being identified as in need of improvement to allow the state to best identify those most needing assistance or intervention.

In contrast, Massachusetts’ existing state system has proven extremely valuable. Our system places schools and districts on a five-level scale, ranking the highest performing in Level 1 and lowest performing in Level 5. The strength of this accountability system is undergirded by the state’s 2010 *Act Relative to the Achievement Gap*, which provides the tools, rules, and supports necessary for the state to aggressively engage with schools and districts in Levels 4 and 5.

Our proposal seeks to enhance the state system by establishing a new goal: to cut our state’s proficiency gaps in half by 2017. We will also establish a new marker to identify schools and districts with the largest achievement gaps and will further differentiate interventions by accountability status. Taken together, these changes will allow us to support every school where students continue to struggle and create a system focused on college and career readiness that supports continuous improvement in every corner of the Commonwealth.

Goal and Annual Measurable Objectives

On October 25, 2011, the Massachusetts Board of Elementary and Secondary Education voted to adopt a revised goal for all districts, schools, and subgroups in the state: to **reduce the proficiency gap by half by 2017**, thus reducing by half the proportion of students who are not college and career ready. Meeting this goal will require all schools and districts to accelerate progress for all students, particularly those who are furthest behind. Through the hard work and dedication of their teachers and students, many Massachusetts schools and districts have

already halved their proficiency gaps over the past five years, proof that our goal is ambitious, yet achievable.

To measure progress toward that goal and classify schools in an accountability and assistance level, we are proposing to create a Progress and Performance Index (PPI) that combines a set of measures that include our current best indicators of progress towards college-and career-readiness: progress on gap-closing as measured by our state assessments in English language arts, mathematics, and science; performance at the *Advanced* and *Warning/Failing* levels; growth/improvement; and graduation and dropout rates for high schools. Targets will be differentiated for each district, school, and subgroup depending on its starting point in the baseline year, 2010–11, with the goal in each case to cut in half the proportion of students who are not on track to college and career readiness (performing at least at the *Proficient* level). As a result, districts, schools, and subgroups that are furthest behind are expected to make the strongest gains and thus close achievement gaps.

Massachusetts will continue to issue and report Annual Measurable Objective (AMO) determinations using PPI indicators for students in the aggregate, low income students, students with disabilities, English language learners, and the state’s major racial and ethnic subgroups. We will also make determinations for a new “high needs” subgroup composed of students who are low income, have a disability, or are English language learners or former English language learners.

The high needs subgroup includes students falling into one or more of the following subgroups: student with disabilities, English language learners, former English language learners, and low income students. Many of our schools and subgroups do not meet our minimum N threshold of 40 students for issuing accountability determinations. By measuring progress and performance for the high needs student subgroup rather than considering each student demographic group individually, we are able to hold nearly 200 more schools accountable for subgroup proficiency gaps along with overall performance. At the same time, this still allows us to retain a focus on all students, including racial and ethnic minorities. In 2010-11, the high needs group included 82% of African-American students and 88% of Hispanic students statewide. In addition, using the high needs group for accountability determinations addresses a frequent stakeholder criticism of the AYP system in that it eliminates double-, triple-, or quadruple-counting individual students who may be classified in multiple subgroups.

Beyond the indicators described above, the PPI will also consider participation in the state English language arts, mathematics, science, and English language proficiency tests. It will include data for the four most recent years, with the most recent years weighted most heavily. Over time, as additional indicators of college and career readiness become available, we will expand and improve the index to include them. This index will allow us to better identify and describe schools and districts needing support across a spectrum of very strong to very weak performance. Additional details on our proposed AMO and PPI methodology appear in section 2.B.

Classification

We propose to classify schools as follows.

Level	Description
Level 1	On track to college and career readiness
Level 2	Off track from college and career readiness
Level 3	Focus: Lowest performing 20% of schools (including schools with the largest gaps)
Level 4	Priority: Lowest performing schools
Level 5	Priority: Chronically underperforming schools

We will also use four years of data to identify and recognize high achieving and/or greatly improving schools. These will be considered our state’s Commendation, or Reward, schools. Commendation schools may be classified in Levels 1 or 2.

As described in more detail in sections 2.D.i and 2.E.i, the PPI for all students is the primary consideration in placing schools in Levels 4 and 5, while the PPIs for both all students and the high needs subgroup are factors in the placement in Levels 1, 2, and 3. Whether a school is on- or off-track for college and career readiness will determine if it is classified in Level 1 or 2.

We propose to classify districts at the level of their lowest performing school, in keeping with Massachusetts’ current framework for district and school accountability and assistance. For example, a district with one or more Level 4 schools would be a Level 4 district, while a district whose lowest performing school is Level 2 would be a Level 2 district.

Support

The development of the state’s framework for accountability and assistance was grounded in our belief in three core principles:

1. The district should be the entry point for the state’s accountability and assistance work, not the school. The state’s role should be focused on building district capacity to support and guide improvement efforts in individual schools.
2. A strong accountability system is not enough to ensure continued improvement. A parallel system of assistance and intervention is necessary to secure continued, strong improvement.
3. Every district does not need the same amount of support from the state. The depth of ESE’s engagement with each district should be based on the severity of the problem.

These three principles informed our thinking in the development of this waiver proposal. We are committed to moving away from the “one size fits all” method required under NCLB and to tailor our assistance and support to meet the actual needs of our districts. Our system of

support for districts and schools seeks to clearly define the problem, what needs to be done immediately after classification on the framework, the range of activities that are permissible, and the scope and level of support that districts can anticipate from ESE.

Under our proposal districts will be required to reserve up to 25 percent of their Title I, Part A funds on a sliding scale to address identified needs. Districts will have the flexibility to scale their responses based on their unique needs, but ESE will improve its own fiscal accountability processes to monitor the quality and efficiency of district improvement efforts. Details are contained in Sections 2.D to 2.G.

Supports and interventions available to districts and schools will be available through a range of vehicles (professional development, online modules, professional learning communities, etc.) and will vary in scope to target particular areas that need strengthening. Massachusetts will no longer mandate NCLB school choice and supplemental educational services (SES) as currently required under NCLB. Supports and interventions will instead include: expanded learning opportunities for struggling students, which may include tutoring and other supports offered through strategic partnerships; professional development that is embedded, sustained, and connected to educators' needs; and other supports aligned to ESE's 11 Conditions for School Effectiveness, including those that address students' social-emotional needs and family-school engagement. Specific focus will be placed on the particular needs of students with disabilities and English language learners. Additional details about possible supports and interventions are in Sections 2.F. and 2.G.

Timeline

The results of the spring 2011 Massachusetts Comprehensive Assessment (MCAS) will serve as the baseline for establishing AMO targets for 2011–12 through 2016–17 for all districts, schools, and subgroups. We will publicly announce our initial AMO determinations under this flexibility in August 2012, comparing the 2012 results to the 2011 baseline. At that same time, we will use the Progress and Performance Index (PPI) to classify all schools and districts in the Commonwealth into Levels 1 through 5. Going forward, we will announce progress on AMOs and designations into accountability levels in the late summer each year based on the previous spring's test results.

2.A.ii Select the option that pertains to the SEA and provide the corresponding information, if any.

Option A	Option B
<input type="checkbox"/> The SEA only includes student achievement on reading/language arts and mathematics assessments in its differentiated recognition, accountability, and support system and to identify reward, priority, and focus schools.	<input checked="" type="checkbox"/> 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 to identify reward, priority, and

	<p>focus schools, it must:</p> <ul style="list-style-type: none"> a. provide the percentage of students in the “all students” group that performed at the proficient level on the State’s most recent administration of each assessment for all grades assessed; and b. include an explanation of how the included assessments will be weighted in a manner that will result in holding schools accountable for ensuring all students achieve college- and career-ready standards.
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Beyond English language arts and mathematics, ESE proposes to incorporate results from the state science assessment into the accountability framework. Students in Massachusetts public schools take science assessments in grades 5, 8, and high school and must pass the high school science assessment to receive a diploma; to date, however, these results have not been used in school or district accountability determinations. We intend to begin using science results in our accountability system to reinforce our commitment to college and career readiness and emphasize the growing importance of competency in science, technology, engineering and mathematics (STEM) in today’s economy. This heightened focus on science performance will intensify the need for our public schools to continue to make science education a priority, in addition to English language arts and mathematics.

Schools and districts will be held accountable in the Progress and Performance Index (PPI) for their progress on closing proficiency gaps in science. We do not have student growth data for this assessment so will not include it in the growth/improvement portion of the PPI. Additional details on the role of science in the accountability system are in section 2.B. See Attachment 8 for state-level assessment data for science.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA sets AMOs that differ by LEA, school, or subgroup, the AMOs for LEAs, schools, or subgroups that are further behind must require greater rates of annual progress.

Option A <input type="checkbox"/> Set AMOs in annual equal	Option B <input type="checkbox"/> Set AMOs that increase in	Option C <input checked="" type="checkbox"/> Use another method that is
----------------------------------------------------------------------	-----------------------------------------------------------------------	-----------------------------------------------------------------------------------

<p>increments toward a goal of reducing by half the percentage of students in the “all students” group and in each subgroup who are not proficient within six years. The SEA must use current proficiency rates based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.</p> <p>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</p>	<p>annual equal increments and result in 100 percent of students achieving proficiency no later than the end of the 2019–2020 school year. The SEA must use the average statewide proficiency based on assessments administered in the 2010–2011 school year as the starting point for setting its AMOs.</p> <p>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</p>	<p>educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups.</p> <p>i. Provide the new AMOs and an explanation of the method used to set these AMOs.</p> <p>ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below.</p> <p>iii. Provide a link to the State’s report card or attach a copy of the average statewide proficiency based on assessments administered in the 2010–2011 school year in reading/language arts and mathematics for the “all students” group and all subgroups. (Attachment 8)</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

The overarching goal of Massachusetts’ proposed accountability system is to **reduce the proficiency gap by half by 2017**. This goal applies to the state and to all districts, schools, and subgroups. To measure progress toward the goal and classify schools in an accountability and assistance level, the Massachusetts Department of Elementary and Secondary Education (ESE) proposes to create a Progress and Performance Index (PPI) that combines four years of data on state testing participation, student achievement, student growth/improvement, and graduation and dropout rates to provide a more comprehensive and nuanced measurement of district and school progress toward college and career readiness. ESE will establish annual measurable objectives (AMOs) for each district, school, and subgroup using PPI indicators. The primary purpose of AMOs will be to provide transparent reporting of district and school progress toward college and career readiness for all students, and, in turn, to incentivize continuous improvement. The primary purpose of the PPI is to identify schools and districts most in need of assistance, and, accordingly, place schools and districts in our framework for accountability and assistance.

Our goal, reducing the proficiency gap by half by 2017, represents a refinement of Option A, equally as ambitious, and will help ensure all of our students are on a path towards college and career readiness. Evidence has shown that this goal also is achievable: Over the last six years, 16 percent of Massachusetts schools have halved their proficiency gaps in ELA, 19 percent in mathematics.

Our proposal assumes that scoring *Proficient* or higher on the Massachusetts Comprehensive Assessment System is a robust proxy for college readiness. Previous research¹⁴ on Massachusetts high school graduates demonstrates that students scoring *Proficient* or higher on our grade 10 tests are substantially less likely to require remedial coursework in college. Specifically, the research shows that only 4 percent of students who score *Advanced* require remedial courses in public colleges and universities, and 25 percent of students who score *Proficient* but not *Advanced* need to enroll in a remedial course.

Throughout this section, we refer to measures based on MCAS, our existing state testing system. However, once the PARCC assessments are available we will reset our annual measurable objectives accordingly. In addition, beginning with the school year just completed (2010-11) our student-level data collection includes course completion and grades. We are also in the process of linking our PK-12 and higher education databases. As these data sets mature, we will be incorporating indicators of course-taking into our measure of college and career readiness. These will include successful course completion in the first year of high school (ninth grade success), completion of MassCore (the Commonwealth's college-ready course of study), and success in entry-level, credit-bearing courses in college.

The Progress and Performance Index: Measures

The Progress and Performance Index is a four-year, comprehensive indicator of district and school progress towards college and career readiness that incorporates the best measures of readiness available in Massachusetts today. As additional measures become available, and as our state moves to next generation assessments in 2014–15, we anticipate updating or expanding this index. For now, it includes four types of indicators: testing participation, student achievement, student growth/improvement, and high school graduation and dropout rates.

ESE will use the PPI to classify schools and districts in levels under the framework for accountability and assistance, while AMOs will serve as transparent reporting measures that inform the public and other stakeholders of the progress schools and districts are making toward college and career readiness for all students. Details are below.

1. Testing participation

Participation on state assessments will remain a primary anchor of the accountability system. As is the case presently under NCLB, all districts, schools, and subgroups will be expected to

¹⁴ <http://www.doe.mass.edu/research/reports/0208bhe.pdf>

assess at least 95 percent of their students on the Massachusetts Comprehensive Assessment System (MCAS) and/or the state English Language Learner (ELL) assessment.¹⁵

Any school with less than a 95 participation rate in ELA , mathematics, or science will automatically fail to make its AMO in the aggregate or the subgroup(s) for which the rate falls below 95 percent, and as a result can only be classified in Levels 2 and higher. A school that does not meet its participation AMO may not be classified in Level 1: *On Track*. To meet the participation standard, English language learners in their first year of U.S. schooling must participate in the state ELL assessment and the MCAS for mathematics. ELLs in their second year of U.S. schooling and beyond must participate in both the English language arts (ELA) and mathematics MCAS and the state ELL assessment. Exceptions to the ELL assessment requirement will be made only where accommodations for ELLs with disabilities are not available for a particular test.

2. *Student achievement*

ESE will measure student achievement for districts, schools and subgroups with three indicators:

1. Closing proficiency gaps in ELA, mathematics, and science, as measured by the Composite Performance Index
2. Reducing the percentage of students scoring in the *Warning/Failing* category in ELA and mathematics
3. Increasing the percentage of students scoring in the *Advanced* category in ELA and mathematics

Progress on reaching the statewide goal of **reducing the proficiency gap by half by 2017** will be measured with the Composite Performance Index (CPI), a metric used in Massachusetts since 2004 that rewards continuous improvement toward proficiency. The CPI awards points to each student based on their achievement on the ELA, mathematics, or science assessments; a CPI of 100 indicates that all students are proficient or advanced. The points for all students in the district, school or subgroup are summed together and then divided by the number of students in the group being measured. The result is the CPI for that group and subject. For accountability purposes, ESE combines all tested grades when generating a district, school, or subgroup CPI. The following table provides an example CPI calculation for a group of 20 students.

MCAS Performance Level (Scaled Score Range)	Points Per Student	# of Students	Total Points
------------------------------------------------	-----------------------	------------------	-----------------

¹⁵ Massachusetts currently assesses English language learners with the Massachusetts English Proficiency Assessment (MEPA) but plans to adopt the ACCESS assessment associated with the World-Class Instructional Design and Assessment (WIDA) consortium in 2012–13.

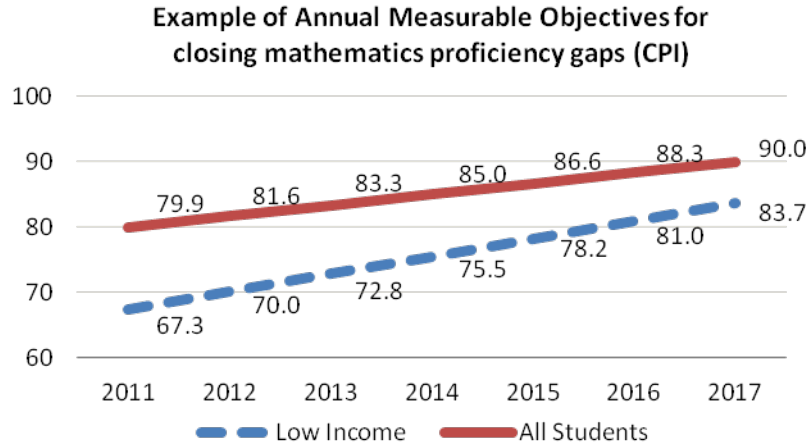
Proficient or Advanced (240–280)	100	10	1000
Needs Improvement High (230–238)	75	4	300
Needs Improvement Low (220–228)	50	3	150
Warning/Failing High (210–218)	25	2	50
Warning/Failing Low (200–208)	0	1	0
Totals		20	1500

$$1500 \div 20 = 75.0 \text{ CPI}$$

The proficiency gap, in turn, is defined as the difference between a subgroup’s CPI and a CPI of 100. For instance, if a school has a 2010–11 CPI of 79.9 for the “all students” category in mathematics, its mathematics proficiency gap would be 20.1 CPI points, or 100 minus 79.9.

ESE will set differentiated targets for all districts, schools, and subgroups to close proficiency gaps in ELA, mathematics, and science. The goal for all will be same: to reduce the proficiency gap by half by 2016–17. Targets will be differentiated based on the group’s baseline in the 2010–11 school year, an acknowledgment that every district, school, and subgroup will be starting from a different place and that those furthest behind will have the most progress to make.

For example, the school referenced above with the proficiency gap of 20.1 CPI points for all students will need to reduce that gap to 10 points by 2016–17, so its 2016–17 target will be a CPI of 90. The 10 CPI points the school is required to gain will be divided into six equal increments to establish targets for each of the six school years until 2016–17. Other subgroups within this school would have different CPI baselines and targets to reflect the need for different rates of improvement to reach the 2017 goal. For instance, if low income students in the same school have a CPI of 67.3 in 2011, their target will be 83.7 by 2017, a faster rate of increase than that of all students. The graph below illustrates this example.



ESE will assign credit in the Progress and Proficiency Index based on how close the district, school, or subgroup comes to meeting the annual targets for ELA, mathematics, and science. Full credit will be given to those that meet the target, as well as to schools whose CPI meets the 80th percentile or higher for the group when comparing statewide results (currently the 80th percentile equates to a CPI of approximately 95 for ELA and 91 for mathematics). This allows us to implement a key feature that was requested by our stakeholders: to enable high performing groups to meet the target even with minor drops in performance. Substantial partial credit is awarded for those that perform close enough to the target to fall within the error band: a range around the target that accounts for potential measurement error. Error bands currently range from 1.0 to 4.5 CPI points, depending on the size of the student group and range of assessment scores, and are generally equivalent to a 95 percent confidence interval.

% Awarded	Achievement Outcome
100%	Met AMO target or met CPI of 80 th percentile for the group
75%	Met target as a result of error band
50%	Improved below target and outside of error band
25%	No change
0%	Decline in CPI

The second achievement indicator will be progress in **decreasing the percentage of students scoring in the *Warning/Failing* category** of the ELA and mathematics MCAS assessments. This indicator holds districts and schools accountable for their lowest performing students and rewards continuous improvement in reducing the percentage of low achievers, ensuring that the focus remain on all students, not just those closest to being proficient. Similar to our statewide goal of reducing the proficiency gap in half by 2017, ESE will set AMO targets for districts and schools to reduce their percentage of students in the *Warning/Failing* achievement categories.

For example, if 14 percent of all students in a school scored *Warning/Failing* in 2010–11, the school’s goal would be to reduce that percentage for the “all students” category to 7 percent by the end of the 2016–17 school year. The 7 percentage points would be divided into six equal increments to establish annual targets. Similar to the proficiency gap measure, groups would have differentiated targets. For instance, if Hispanic students in that same school had a starting *Warning/Failing* percentage of 22%, the goal would be 11% *Warning/Failing* for that subgroup by 2017.

ESE will assign full credit for this indicator to those that meet the target or reach the *Warning/Failing* percentage of the 80th percentile for the group (that is, the percentage at which only 20 percent of the group had lower *Warning/Failing* rates). Others will be awarded partial credit for making progress toward that goal.

% Awarded	Achievement Outcome
100%	Met target or met percentage of 80 th percentile of the group
75%	Met target as a result of error band
50%	Improved below target and outside of error band
25%	No change
0%	Decline in <i>Warning/Failing</i> percentage

The third achievement indicator is **improvement in the percentage of students scoring *Advanced*** on the ELA and mathematics MCAS assessments, intended to hold districts and schools accountable for continuous improvement beyond proficiency. Fewer than 5% of students who score *Advanced* on the grade 10 MCAS tests require remedial courses in college, so creating an incentive to reach *Advanced* will also foster college and career readiness.

ESE will assign credit for this indicator based on changes in a group’s percentage of students scoring *Advanced* relative to the prior year.

% Awarded	Achievement Outcome
100%	Greater than a 4 percentage point improvement in <i>Advanced</i>
75%	3-4 percentage point improvement in <i>Advanced</i>
50%	1-2 percentage point improvement in <i>Advanced</i>
25%	No change
0%	Decline in <i>Advanced</i> percentage

3. Growth/Improvement

Massachusetts views the ability to include student growth and improvement along with

achievement in our accountability system as a major benefit to this waiver opportunity.

Since 2008 Massachusetts has annually reported a measure of student growth on the MCAS. Each student with at least two consecutive years of MCAS scores receives a student growth percentile (SGP), which measures how much the student changed relative to other students statewide with similar scores in previous years. Student growth percentiles range from 1 to 99, where higher numbers represent higher growth and lower numbers represent lower growth. SGPs are calculated for both ELA and mathematics in grades 4 through 8 and grade 10, and we aggregate them for groups of students with the group median.

Our impact data clearly demonstrate that high levels of growth place students on track to proficiency and, in turn, college and career readiness. Specifically, our data show that growth at the 60th percentile results in all students being on track to proficiency in ELA and the vast majority of students being on track to proficiency in math. Accordingly, in PPI calculations, ESE will assign credit to districts, schools, and subgroups for substantial growth/improvement. Our targets for growth/improvement and proposed assignment of credit are described below.

- Attaining an SGP of at least 10 points over the median SGP for the relevant group. For example, the statewide median SGP for special education students is 42, so the special education subgroup within a school or district would meet this standard with an SGP of at least 52.
- Increasing the group’s median SGP by 15 points over the previous school year; or
- Reducing the percentage of non-proficient students by at least 10 percent (assuming at least 40 students in the group are tested).

% Awarded	Meet SGP Target		Increase SGP		Decrease % Not Proficient
100%	10 points or more above group median	or	+15 points	or	≥10%
75%	0 to 9 points above group median	or	+10–14 points		
50%	1 to 9 points below group median	or	+5–9 points		
25%	10 to 19 points below group median	or	+1–4 points		
0%	20 or more points below group median	or	≤0 points	or	<10%

4. High School Graduation and Drop Out Rates.

For high schools, we will include both graduation and dropout rates in the Progress and Performance Index as indicators of success in preparing students to be ready for college and careers. Massachusetts is currently exploring additional measures of college and career readiness for use in the PPI and will propose to include other measures as they become available.

High schools will be held accountable for their cohort graduation rate and will be required to meet the state target to receive full credit in the PPI. However, the PPI will also award partial credit for continuous improvement in the four- and five-year graduation rates. The chart below describes points assigned for 2011–12. In 2012–13 and beyond, Massachusetts will increase its four- and five-year graduation rate targets.

% Awarded	Four-Year Rate		Five-Year Rate
100%	Greater than or equal to 75%	or	Greater than or equal to 80%
50%	≥2 pct. point improvement	or	≥2 pct. point improvement
0%	Less than 75% and less than 2 pct. point improvement	or	Less than 80% and less than 2 pct. point improvement

High schools will also be held accountable for their annual dropout rate. The cohort graduation rate is a cumulative four-year statistic and is difficult to improve in one year. Including the dropout rate provides an opportunity to reward schools that are reducing dropouts, even if the impact has not yet registered in the cohort graduation rate. Districts, schools and subgroups will all be expected to halve their annual dropout rates by 2017, with differentiated targets similar to those described above.

For example, a school with a 2010–11 annual dropout rate of 3.0% in the “all students” category will have a goal of reducing that percentage to 1.5% by the end of the 2016–17 school year. The 1.5 percentage points will be divided into six equal increments to establish targets for each of the six school years until 2016–17. Similar to the CPI targets, groups would have differentiated targets with the same goal. For example, English language learner students in that same school with a starting dropout rate of 5.0% would have a goal of 2.5% by the 2017 school year.

Credit for the annual dropout rate in the PPI will be awarded as follows:

% Awarded	Dropout Rate Outcome
100%	Met target
75%	Met target as a result of error band
50%	Improved below target and outside of error band
25%	No change
0%	Decline in annual dropout rate

Calculating the Progress and Performance Index

The PPI combines all of the indicators described above into a weighted index that uses four years of data. After accounting for the participation requirement, the PPI consists of nine indicators for elementary and middle schools and 11 indicators for high schools in each year, as follows:

Category	Indicators
Participation	ELA, mathematics, science
Achievement	
• Reduce proficiency gaps	ELA, mathematics, science
• Increase % <i>Advanced</i>	ELA, mathematics
• Decrease % <i>Warning/Failing</i>	ELA, mathematics
Growth	
• Meet growth objective	ELA, mathematics
Additional indicators for high schools	Cohort graduation rate, annual dropout rate

Each year, each district, school, and subgroup will be given full or partial credit, as described above, on each of these indicators. These scores will be combined together for an overall rating for each year. Next, we will combine four years of ratings into a weighted index, with the most recent year's data carrying the greatest weight, as follows:

- Most recent year: 40%
- One year prior: 30%
- Two years prior: 20%
- Three years prior: 10%

PPI results will be reported for each district, school, and subgroup, as well as the state as a whole.

Classifying schools and districts

A primary goal of this proposal is to unify our federal and state accountability systems. Too often today our districts and schools are confused by how the two systems interact and are left unsure of how their accountability designations were determined. We believe that the PPI will solve this problem. The same data indicators across the same number of years will be used both to report federal determinations for districts and schools and to classify them within our state accountability system. A unified system of accountability will help schools understand their data and how it relates to their classification and will help ESE target its resources and interventions effectively to the schools and districts in most need.

We propose to classify schools and districts as follows.

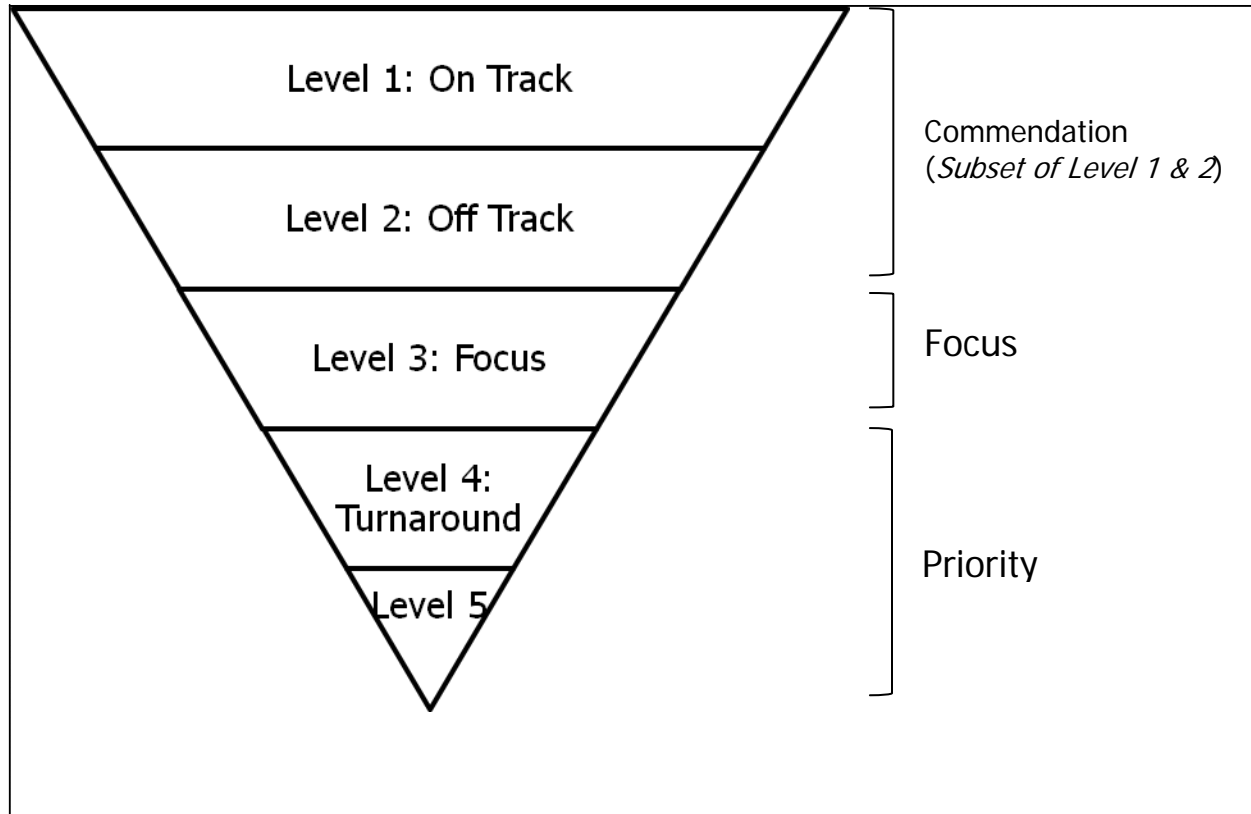
Level	Description
Level 1	On track to college and career readiness
Level 2	Off track from college and career readiness
Level 3	Focus: Lowest performing 20% of schools (including schools with the largest gaps)
Level 4	Priority: Lowest performing schools
Level 5	Priority: Chronically underperforming schools

We will also use four years of data to identify and recognize high achieving and/or greatly improving schools. These will be considered our state’s Commendation, or Reward, schools. Commendation schools may be classified as Levels 1 or 2.

Schools will be assigned into accountability levels based on their PPI for two groups: all students and high needs students. The high needs subgroup includes students falling into one or more of the following subgroups: student with disabilities, English language learners, former English language learners, and low income students. Many of our schools and subgroups do not meet our minimum N threshold of 40 students for issuing accountability determinations. By measuring progress and performance for the high needs student subgroup rather than considering each student demographic group individually, we are able to hold nearly 200 more schools accountable for subgroup proficiency gaps along with overall performance. At the same time this approach allows us to retain a focus on all students, including racial and ethnic minorities. In 2010-11 the high needs group included 82% of African-American students and 88% of Hispanic students statewide.

As described in more detail in sections 2.D.i and 2.E.i, the PPI for all students is the primary consideration in identifying schools for placement in Levels 4 and 5, while the PPIs for all students and the high needs subgroup are factors in the placement of schools in Levels 1, 2, and 3. Whether a school or district is on or off track for college and career readiness will determine if it is classified in Level 1 or 2.

Below is a graphical summary of our proposed accountability levels and how they relate to the required designations of Reward, Focus, and Priority schools.



2.C REWARD SCHOOLS

2.C.i Describe the SEA’s methodology for identifying highest-performing and high-progress schools as reward schools.

ESE agrees that schools that make great progress deserve to be recognized and plans to meet the federal requirement for Reward Schools by adapting its existing Commendation School identification process. Schools will be identified as Commendation Schools if they demonstrate high achievement, make strong progress, or narrow proficiency gaps. Commendation schools will be determined by identifying the strongest performers over four years on various elements of the Progress and Performance Index (PPI) described in section 2B and will be commended in every category in which they meet the qualifying criteria. Based on preliminary simulations, ESE expects approximately 5 to 10 percent of all schools to annually meet the criteria for designation as Commendation Schools. Districts will not receive Commendation designations.

Commendation for High Achievement

High achieving schools are those with the highest relative performance for both the aggregate and high needs groups across the PPI achievement indicators (i.e., CPI proficiency gaps, percent *Warning/Failing*, percent *Advanced*, annual dropout rate, and four-year and five-year cohort graduation rates). To be eligible, a school must meet the following

conditions:

- Be classified in Level 1;
- Assess 20 or more students in the aggregate in each of the most recent four years and assess 40 or more high needs students in each of the most recent four years;
- Rank within the top 10% of schools with similar grade spans on the PPI achievement indicators for both the aggregate and the high needs groups;
- Achieve an aggregate five-year cohort graduation rate of 94% or higher;¹⁶ and
- Demonstrate improvement on the CPI for the high needs subgroup in both English language arts (ELA) and mathematics over the most recent four school years.

Commendation for High Progress

High progress schools are those with the highest relative performance on the PPI growth/improvement indicators (median student growth percentile and changes in CPI) in both English language arts and mathematics for students in the aggregate. To be eligible, a school must meet the following conditions:

- Be classified in Level 1 or 2;
- Assess 20 or more students in the aggregate in each of the most recent four years;
- Rank within the top 10% of schools with similar grade spans on the PPI improvement indicators for students in the aggregate;
- Demonstrate improvement in the five-year cohort graduation rate for students in the aggregate over the most recent four school years, or achieve an aggregate five-year cohort graduation rate of 94% or higher for three consecutive years;
- Demonstrate improvement on the CPI for the high needs subgroup in both English language arts (ELA) and mathematics over the most recent four school years.

Commendation for Narrowing Proficiency Gaps

Schools commended for narrowing proficiency gaps are those with the highest relative performance on the PPI growth/improvement indicators in both ELA and mathematics for students in the high needs subgroup. To be eligible, a school must meet the following conditions:

- Be classified in Level 1 or 2;
- Assess 40 or more high needs students in each of the most recent four years;
- Rank within the top 10% of schools with similar grade spans on the PPI improvement indicators for students in the aggregate;
- Demonstrate improvement in the five-year cohort graduation rate for students in the aggregate over the most recent four school years, or achieve an aggregate five-year cohort graduation rate of 94% or higher for three consecutive years;
- Demonstrate improvement on the CPI for the high needs subgroup in both ELA and mathematics over the most recent four school years.

¹⁶ This is approximately equivalent to the 75th percentile of five-year graduation rates for the 2011 cohort.

- 2.C.ii Provide the SEA’s list of reward schools in Table 2.
- 2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Schools that make great progress and have success in closing proficiency gaps deserve to be celebrated and recognized for their achievements and can serve as useful mentors for schools that continue to struggle. We plan to designate an elite group of schools (approximately 5 to 10 percent of all schools, based on current simulations) that make substantial gains as Commendation Schools and recognize them annually both through a state-level event and by awarding each school with a certificate for display within the school. Once named, these schools will have the opportunity to engage in regional activities and meaningful partnerships with our Level 3/Focus schools.

The state’s District and School Assistance Centers (DSACs), a primary component of our statewide system of support, regularly convene school and district leaders in study groups to discuss key issues such as the characteristics and implementation of interventions that show great promise. Our stakeholders have voiced a clear desire for more systematic way to share best practices, and under this flexibility, our Commendation Schools could serve as valuable demonstration sites. Depending on the availability of funding, these schools will be eligible for a limited number of “promising practice” grants to encourage their leadership teams to participate in communities of professional practice with their peers from schools with similar demographic and performance profiles within the DSAC region, particularly Level 3/Focus schools. This will help connect our lower performing schools with relevant and proven models for improving results.

We anticipate that educators from the state’s Commendation Schools will welcome the opportunity to share their lessons learned with leadership teams from other schools and will appreciate the recognition their schools will receive as a result of this new designation.

The partnerships between Commendation Schools and Level 3/Focus schools will be just one facet of a larger system of networking and partnership activities already in place in Massachusetts that we anticipate enhancing through this waiver. For details, please see the description of our process for building state, district, and school capacity in Section 2.G.

2.D PRIORITY SCHOOLS

- 2.D.i Describe the SEA’s methodology for identifying a number of lowest-performing schools equal to at least five percent of the State’s Title I schools as priority schools.

Massachusetts currently has a strong system for identifying and intervening in our lowest performing schools and districts. The waiver will enable us to integrate our state system with federal accountability requirements and, in turn, expand the supports available to those schools.

In our current state accountability system, we designate the lowest performing 20% of schools in the state as Level 3. Under state law we may designate up to 4% of those as Level 4 schools: the lowest performing, slowest improving schools statewide. Both Level 3 and Level 4 schools are currently identified with the same indicators we propose to include in the Progress and Performance Index (PPI), using a slightly different methodology. Both designations are made using four years of data. Through this process we have already identified 35 schools as Level 4 schools, 34 of which remain open as of fall 2011 (see Attachment 9). On November 15, 2011, the Commissioner will name an additional six Level 4 schools. We propose to classify all 40 of these schools as Priority schools for the purposes of this waiver.

As new assessment data becomes available, we will identify additional Level 4/Priority schools using the PPI methodology described above to meet the requirement that Priority schools equal 5% of the state's Title I schools. We will continue to identify Level 4/Priority schools from among the lowest performing 20% of schools. However, we will adjust the current methodology for identifying Level 3 schools to ensure that this group includes the schools with the largest achievement gaps, as Level 3 will now be used for identification and classification of our Focus schools. The methodology for identifying Focus schools is described in section 2.E.iii. The Commissioner will have discretion to classify a school as Level 4/Priority based on a number of factors, including resource availability and other information collected beyond the PPI.

State law requires that the total number of Priority schools not exceed 4% of all schools statewide. This limit is larger than the minimum number of schools we will need to designate to meet the federal waiver requirement for Priority schools, so we anticipate no difficulty in integrating the two systems.

2.D.ii Provide the SEA's list of priority schools in Table 2.

2.D.iii Describe the meaningful interventions aligned with the turnaround principles that an LEA with priority schools will implement.

Overview

As described in Section 2.D.i., our lowest-performing schools are classified as Level 4 or Level 5 in our district framework for accountability and assistance. For the purpose of this flexibility, these will be our Priority schools.

Since the 2010 enactment of the Commonwealth’s Act Relative to the Achievement Gap, state law and regulation require that once a school is placed in Level 4, the Department of Elementary and Secondary Education (ESE) must notify the district’s school committee, superintendent, local teachers’ union or association president, and the school’s principal and parent organization. This begins a purposefully detailed, inclusive process designed to involve the community in the turnaround of the Level 4 school, resulting in a redesign plan approved by the commissioner. State law (M.G.L. Chapter 69, Section 1J) requires that the redesign plan be designed only after soliciting the recommendations of a local stakeholder group, convened by the superintendent, that includes representatives from the district’s school committee, the school’s administration and faculty, local social service, health and child welfare agencies, local workforce development agencies, parents, community members, ESE, and other stakeholders. The federal requirements for school improvement grant funding, both generally and for each intervention model, are integrated within the redesign plan. The superintendent must submit the redesign plan to the local stakeholder group, local school committee, and lastly to the commissioner for approval.

Beyond contributing to approval of the plan, the state assigns assistance liaisons and accountability monitors, defines exit criteria, including measurable annual goals tailored to each school and based on empirical data, assesses fidelity to the federal turnaround principles as well as district capacity to implement one of four federally-required implementation models, and provides targeted assistance via partner providers, tools, templates, and other resources.

Redesign Plans

Our system requires districts with Level 4 schools to develop a redesign plan to rapidly implement interventions aligned to each of *Conditions for School Effectiveness*. These conditions identify research-based interventions that all schools, especially those that are most struggling, need to implement to effectively meet the learning needs of every student. Our *District Standards and Indicators* identify the characteristics of effective districts in supporting and sustaining these conditions in their schools.

We provide our Level 4 schools and districts with a redesign plan template that meets the statutory requirements for a “turnaround plan” under state law, and also serves as the foundation for any district application for federal School Improvement grant (Section 1003(g)) funding. The redesign plan takes the place of any other school improvement plan and is a multi-part instrument that, for a three-year period:

- Addresses district-level capacity to support its Level 4 schools;
- Provides a blueprint for intervention at each identified school;
- Sets measurable annual goals which serve as the standard for exiting Level 4 status. (Complete details are contained in the redesign plan template, included as Attachment 12.)

Within the redesign plan, districts are required to identify any district-level issues that will be addressed. Prior to identifying interventions in Level 4 schools, they must demonstrate that they have the capacity to plan for, implement, and monitor school-level redesign efforts, including the effective allocation of resources (people, time, materials, and fiscal, including all ESEA funds).

In addition, the district must:

1. Clearly describe what their approach will be to result in rapid, systemic change in its Level 4 schools within three years. This must include a theory of action guiding their strategies and school-level interventions;
2. Provide a description of the district’s redesign and planning process, including descriptions of teams, working groups, and stakeholder groups involved in the planning process, especially the process used by district-and school-level redesign teams to identify the interventions selected for each Level 4 school;
3. Describe how the district will recruit, screen, and select any external providers to provide the expertise, support, and assistance to the district or to schools;
4. Describe the district’s systems and processes for ongoing planning, supporting, and monitoring the implementation of planned redesign efforts, including the teaming structures or other processes, such as the use of liaisons, coaches, or networks, that will be used to support and monitor implementation of school-level redesign efforts;
5. Describe which district policies and practices currently exist that may promote or serve as barriers to the implementation of the proposed plans and the actions they have taken or will take to modify policies and practices to enable schools to implement the interventions fully and effectively;
6. Describe how the district will ensure that the identified school(s) receive ongoing, intensive technical assistance and related support from the state, district or designated external partner organizations;
7. Describe how the district will monitor the implementation of the selected intervention at each identified school and how the district will know that planned interventions and strategies are working,

Examples of Meaningful Interventions

In addition to identifying systems, processes, and issues at the district level, the plans must also describe how the school will implement interventions aligned to the Conditions for School Effectiveness as a blueprint for school-level redesign efforts. A description of each condition and examples of meaningful interventions aligned with the turnaround principles that districts with Priority schools could implement is below.

Condition for School Effectiveness	Examples of Interventions	Turnaround Principles Addressed
Effective School	The district has a pipeline for identifying, recruiting,	Provide strong

Leadership	selecting, and supporting school leaders who are likely to be successful in accelerating student achievement and supporting adult learning in the Level 4 school. ¹⁷ The intervention includes quantitative and qualitative tools that create a profile of the effective leader and places the individual within a continuum on an individualized professional learning plan that matches support to the principal's strengths and needs. The principal receives a signing bonus to work in a Level 4 school and has further opportunities for financial rewards based on the school meeting specific academic achievement targets. ¹⁸	leadership
Principal's Staffing Authority	Base the district and Level 4 school's recruitment, selection, incentives, and induction efforts on rigorous turnaround competencies that aggregate best practices and research about effective teaching and turnaround schools from leading teacher recruitment organizations (e.g., Teach for America, The New Teacher Project, the Boston Teacher Residency Program) and that serve as key leading indicators of the teacher's likely effectiveness in improving student achievement outcomes. ¹⁹	Ensuring that teachers are effective and able to improve instruction; Strengthen the school's instructional program
Professional Development and Structures for Collaboration	Redesign the school day to facilitate school-based learning communities for teachers in Level 4 schools to create opportunities for peer-led support and accountability. This intervention provides space and place for differentiated paths and plans for teacher growth and improvement depending on their career stage and performance, as well as their rating of practice and impact on student learning based on multiple measures. The intervention may also include instructional coaches who work with teachers to strengthen their skills in areas such as lesson planning, student data analysis, and in-class pedagogy. (For a more detailed description of this particular intervention, please refer to Section 2.E.iii.) ²⁰ The intervention would be coupled with a	Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's instructional program; Use data to inform instruction and for continuous

¹⁷ Examples of how we prepare district and school leaders to effectively lead their systems, are posted at <http://www.doe.mass.edu/edleadership/nisl/>.

¹⁸ Details about the state's vision for creating a cohesive school leadership system are posted at <http://www.doe.mass.edu/edleadership/mcls/>.

¹⁹ Details on the staffing authority intervention are posted at <http://www.doe.mass.edu/sda/framework/level4/SelectingTeachers.pdf>

²⁰ The state's Common Planning Time Self-Assessment is posted at <http://www.doe.mass.edu/sda/ucd/CPTtoolkit.doc>.

	<p>schedule for conducting regular learning walkthroughs to place the instruction observed on a continuum of practice that encourages collaborative conversations among participants about the nature of teaching and learning, which can lead to decisions and actions that are deeply rooted in the classroom experience.²¹</p>	improvement
Tiered Instruction and Adequate Learning Time	<p>Implement a tiered system of support focused on system-level change in classrooms, the entire Level 4 school, or across a network of Title I school to meet the academic and non-academic needs of all students, including students with disabilities, English learners, and students who are academically advanced. (For a more detailed description of this intervention, please refer to Section 2.E.iii.)</p>	<p>Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's instructional program; Use data to inform instruction and for continuous improvement</p>
Students' Social, Emotional, and Health Needs	<p>Provide school-based services to address the social, emotional, and health needs of the students in the Level 4 school. The school and parents jointly address the developmental needs of students early in their education; school teams including school nurses, counselors and teachers meet on a regular basis to discuss and address the challenges of individual students; students receive routine and preventative care. As a consequence, the proportion of at-risk students will decline as they progress through school, and inequalities in literacy, numeracy, and other measures of educational attainment would be sharply reduced. (For a more detailed description of this intervention, please refer to Section 2.E.iii.)</p>	<p>Strengthen the school's instructional program; Use data to inform instruction and for continuous improvement; Establish a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement;</p>

²¹ The state's Learning Walkthrough Implementation Guide is posted at <http://www.doe.mass.edu/sda/ucd/walk/ImplementationGuide.pdf>

		Provide ongoing mechanisms for family and community engagement
Family-School Relationships	Establish a coordinated early childhood education program that provides young children who are likely to belong to the focus group in a Level 4 school with the early learning experiences they will need to succeed in elementary school. The intervention may also employ an intergenerational component that helps parents provide a home environment that supports children's learning needs, provides opportunities for them to monitor the progress of their child and communicate with school personnel, and provides assistance to parents to tutor their children at home to reinforce work done in school. (For a more detailed description of this intervention, please refer to Section 2.E.iii.)	Establish a school environment that improves school safety and discipline and addressing other non-academic factors that impact student achievement; Provide ongoing mechanisms for family and community engagement
Strategic Uses of Resources and Adequate Budget Authority	Use of our District Analysis and Review Tools (DARTs) to analyze more than 40 quantitative indicators to gauge the overall health of the district and school, especially as compared to like districts and schools that are getting better results over time, to self-evaluate and make sound, strategic decisions in the allocation of resources and in specific areas such as staffing and finance and in serving English language learners. ²² We are also developing a similar tool for examining school and district strengths and needs with respect to its students with disabilities. ²³	Provide strong leadership; Use data to inform instruction and for continuous improvement
Aligned Curriculum	Implement a six-stage process for developing professional learning communities in the school that define the roles and responsibilities of teachers, school leaders, and district leaders at each stage. The six stages are: 1) launching the work of the instructional team to reduce teacher isolation by increasing professional collaboration around the instructional core, establishing a vision and purpose, and handling logistics and setting norms; 2) analyze data and set instructional and performance targets at	Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's

²² The DART tool is posted at <http://www.doe.mass.edu/sda/dart/>

²³ The District Data Team Toolkit is posted at <http://www.doe.mass.edu/sda/ucd/ddtt/Introduction.pdf>.

	each level (school, grade/course, classroom, and for individual students); 3) prioritize students' skill, conceptual understanding, and problem-solving needs, and develop a plan to address each student's individual needs; 4) build and share standards-based lessons; 5) implement collaboratively designed lessons and monitor progress; and 6) celebrate success and review progress by reflecting on the work of the instructional team and archiving and disseminating effective lessons. ²⁴	instructional program; Use data to inform instruction and for continuous improvement
Effective Instruction	Within a tiered system of support, the district and Level 4 school has a model for English language learner instruction that conceptualizes academic language, effectively addresses the core components of English language acquisition, incorporates academic language in instructional practice, and focuses on mastery that will support these students' successful preparation for college and career. Classroom routines, content and language expectations will be coordinated at each language proficiency level and during transition from one level of language acquisition to the next. Embedded professional development is designed to match the professional and learning needs of staff and to build upon English learner teaching strategies across all content areas. The model includes an English learner coach who works side by side with mathematics and literacy coaches in the Level 4 school, as well as other specialists. The coach follows a schedule that allows for collaboration with other coaches by following an established coaching cycle, as well as "on demand" coaching. The coach identifies language needs, develops and supports sheltering strategies for all English learners in the Level 4 school, and monitors language development. ²⁵	Ensuring that teachers are effective and able to improve instruction; Redesign the school day, week, or year; Strengthen the school's instructional program; Use data to inform instruction and for continuous improvement
Student Assessment	Within a tiered system of support, the district and school has a balanced system of formative and benchmark assessments. The system is guided by is guided by: 1) Universal Design for Learning (UDL) principles (multiple means of representation, multiple means of action and expressions, and	Ensuring that teachers are effective and able to improve instruction; Redesign the

²⁴ Professional Learning Community guidance is posted at <http://www.doe.mass.edu/sda/ucd/PLCguidance.doc>.

²⁵ Details on our blueprint for tiered systems of support is posted at <http://www.doe.mass.edu/mtss/>.

	<p>multiple means of engagement), 2) valid research, 3) the analysis of MCAS results and other assessments, and 4) input from professional staff. One such intervention may include the Galileo Instructional Data System. This assessment and data analysis system enhances the ability of teachers, school and district leaders, parents, and students to identify trends in student learning, improve classroom instruction, and ultimately raise student academic achievement. Districts design benchmark (interim) assessments and then use the technology for administration, analysis, and reporting. These assessments provide data to inform instruction, support programmatic decision-making, encourage collaborative inquiry, and enable systematic student interventions in Level 4 schools.²⁶</p>	<p>school day, week, or year; Strengthen the school’s instructional program; Use data to inform instruction and for continuous improvement</p>
--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------

Because our Level 4/Priority schools are required to address all of these conditions at once in their redesign plans, we have seen many of these schools rapidly transform into high functioning learning environments for students. This occurs through the redesign of school and district systems and supports including school leadership, instruction, and family/community partnerships. It also involves a rapid diagnosis of student needs, instruction tailored to the needs of each student, and a culture of high expectations for students, parents, and families.

2.D.iv Provide the timeline the SEA will use to ensure that its LEAs that have one or more priority schools implement meaningful interventions aligned with the turnaround principles in each priority school no later than the 2014–2015 school year and provide a justification for the SEA’s choice of timeline.

Massachusetts has already begun to implement meaningful interventions in its existing Level 4/Priority schools. In January 2010, the state legislature passed *An Relative to the Achievement Gap*, which codified through law and regulation the identification of the state’s lowest performing schools as Levels 4 and Level 5. Massachusetts identified 35 Level 4/Priority schools in spring 2010. As of November 2011, 34 of those schools remain open and are in the process of implementing redesign plans. Results from the 2011 MCAS show that two-thirds of our Level 4/Priority schools showed substantial improvement in student achievement in both English language arts and mathematics, so we are confident that our turnaround strategies hold great promise in rapidly improving student results.

Our Commissioner will identify an additional 6 Level 4/Priority schools on November 15,

²⁶ Details on best practices in using the Galileo Instructional Data System is posted at <http://www.doe.mass.edu/omste/galileo/0509teleconf.pps>

2011. We will identify additional Level 4/Priority schools based on assessment results from spring 2012 and beyond. We are committed to ensuring that the turnaround principles are implemented in each Level 4/Priority School by the start of the 2014–15 school year.

2.D.v Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement exits priority status and a justification for the criteria selected.

In accordance with state regulations governing district and school accountability and assistance (603 CMR 2.00), ESE has established the following academic exit criteria for existing Level 4 schools, which we propose should also apply to Level 4/Priority schools. Please note that as we move forward in time, we will use updated data when establishing thresholds for comparable improvement:

- 1) Increase the Composite Performance Index (CPI) in English language arts (ELA) and mathematics in the aggregate and for high needs students over a three-year period.
 - a) Level 4 elementary and middle schools shall increase the CPI comparable to the improvement that the top 30 percent of improving schools made statewide between 2006 and 2009.
 - b) Level 4 high schools shall increase the CPI comparable to the improvement that the top 40 percent of improving schools made statewide between 2006 and 2009.
- 2) Decrease the percentage of students scoring *Warning/Failing* on standard MCAS tests in ELA and mathematics in the aggregate and for all high needs students over a three-year period.
 - a) Level 4 elementary and middle schools shall decrease the percentage of students scoring *Warning/Failing* on standard MCAS tests comparable to the improvement that the top 30 percent of improving schools made statewide between 2006 and 2009.
 - b) Level 4 high schools shall decrease the percentage of students scoring *Warning/Failing* on standard MCAS tests comparable to the improvement that the top 40 percent of improving schools made statewide between 2006 and 2009.
- 3) Achieve and maintain a median student growth percentile (SGP) of 40 or higher in ELA and mathematics in the aggregate and for all high needs students within three years; and
- 4) By the end of the three-year period for which Level 4 high schools have set measurable annual goals, such schools shall meet the Commonwealth's graduation rate target for

that year for all student groups.

In addition, prior to removing a school from Level 4 status, ESE will ensure that the capacity and conditions are in place at both the district and school levels to sustain that improvement.

2.E FOCUS SCHOOLS

2.E.i Describe the SEA’s methodology for identifying a number of low-performing schools equal to at least 10 percent of the State’s Title I schools as “focus schools.”

State statute requires ESE to identify Level 3 schools as the lowest performing 20% of all schools in the state. We do this using four years of data on the performance of students in the aggregate on the same indicators we plan to use in our Progress and Performance Index (PPI). Schools are identified proportionately by grade span to ensure equitable representation of all types of schools. We propose to combine this approach with one that identifies the schools with the largest achievement gaps and classify all these schools as Level 3/Focus schools.

To identify Level 3/Focus schools under our proposed new system, we will begin by identifying the 10% of Title I schools in the state with persistently low subgroup achievement levels and graduation rates, per the waiver requirements for Focus schools. Among this 10% of schools, we will first select high schools whose five-year cohort graduation rate data over the most recent four consecutive years was below 60% for the high needs subgroup in each of the four years (approximately 20 schools for 2011–12). The remaining schools to meet the 10% requirement will be those with the lowest performance on the PPI for the high needs subgroup. We will select schools proportionately within grade spans, consistent with current practice, and will ensure that English language learners, students with disabilities, and low income subgroups are each represented.

To meet the state requirement to designate the lowest 20% of all schools as Level 3, we will need to identify additional schools in this level. These schools will be those with the lowest performance on the PPI for students in the aggregate. All schools in Level 3, whether identified on the basis of low graduation rates, low high needs subgroup performance, or low aggregate performance, will be considered Level 3/Focus schools.

With each Level 3/Focus School designation we will clearly indicate the student group that should be prioritized at the school; for example, “Focus School: English language learners” or “Focus School: high needs students.” If a Focus School has more than one low performing subgroup, then ESE will identify each of the lowest performing groups to maintain priority on the students most in need of additional support. These designations will guide the interventions described in 2.E.iii.

2.E.ii Provide the SEA’s list of focus schools in Table 2.

2.E.iii Describe the process and timeline the SEA will use to ensure that its LEAs that have one or more focus schools will identify the specific needs of the SEA’s focus schools and their students and provide examples of and justifications for the interventions focus schools will be required to implement to improve the performance of students who are the furthest behind.

Timeline

As described in Section 2.E.i, we will use the four most recent years of data to identify Level 3/Focus schools. Beginning in summer 2012, districts will be notified annually if one or more of their schools will be designated as a Level 3/Focus school. This designation will serve as a formal acknowledgement that current practices are not working in a way that serves all students and will trigger a requirement for the district to establish priorities for action and make decisions about the allocation of resources, including people, time, materials, and funding. Our regional District and School Assistance Centers (DSACs) will be available to support these schools in this planning process.

Within 90 days of being designated a Level 3/Focus school, districts will be required to submit a proposal to the Department of Elementary and Secondary Education (ESE) for implementing the interventions they have identified. ESE will review the plans, provide feedback and in some cases, may require districts to implement specific interventions based on our interpretation of the needs assessment or other information, such as findings from a review of the district and its schools by our accountability office.

Once the planning is complete, it is expected that work will begin immediately. The district will be required to implement the interventions as quickly as possible, preferably during the school year in which the school received its Level 3/Focus designation, but no later than the start of the following school year.

Process

Level 3/Focus schools will use the *Conditions for School Effectiveness Self-Assessment* to determine which interventions should be considered the highest priority.²⁷ This is a rigorous state-developed instrument designed to enable districts and schools to gauge their development of each condition and related interventions along a continuum. (The 11 *Conditions for School Effectiveness* are the same areas that must be addressed by our Level 4/Priority schools in developing redesign plans, as described in Section 2.D.iii.)

The conditions are aligned with our six *District Standards and Indicators*, a set of key

²⁷ The Conditions for School Effectiveness Self-Assessment is available at <http://www.doe.mass.edu/sda/ucd/CSESelf-Assessment.doc>.

indicators of the district’s ability to effectively support all of its schools while intervening aggressively in its most struggling schools.²⁸ In performing the needs assessment, the district may discover that more systemic change is needed in its systems and structures, such as how the school is governed, staffed, or funded.

All of the state’s districts are expected to make steady progress toward implementing the *Essential Conditions for School Effectiveness* in their schools and those with Level 4/Priority schools are required to develop a redesign plan to rapidly address all 11 conditions. Level 3/Focus schools will be expected to use the *Conditions for School Effectiveness Self-Assessment* to prioritize those conditions directly linked to the most struggling student groups and implement interventions most likely to have a positive impact on these populations. In some schools this may affect only specific student groups, while in others these interventions may have a direct impact on every student.

We propose that a district with one or more Level 3/Focus schools be required to reserve up to 25 percent of its Title I, Part A funds on a sliding scale to support the implementation of interventions. This set-aside will vary depending on the scope of the problem, the number of affected schools in the district, the number of students in the focus population, and the district’s overall Title I, Part A allocation.

To conform to the rules for qualifying Title I school attendance areas, we propose allowing the district to set the funding aside at the district level. This will enable the district to address needs in multiple Title I schools or to use Title I funding for district-wide support (e.g., instructional coaches or school networking activities). We anticipate that by giving districts some degree of flexibility in how to use these resources, they will be able to maximize the benefit based on the unique needs of their Level 3/Focus schools.

The following examples illustrate two likely scenarios we anticipate that some districts may face:

- A district with one Level 3 school and a relatively small Title I, Part A allocation may have a focus population that is small in size relative to the overall enrollment of the school. In this case, a single, targeted intervention may be appropriate, the cost of which could approximate 5 percent of the district’s overall Title I, Part A allocation.
- Alternately, a district with either multiple Level 3 schools or a single Level 3 school with a large enrollment and for which the focus population is all students may need to fund a broader set of interventions to impact the entire school system. Under this scenario, more resources and a longer-term change process may be needed, and we would require the district to commit up to 25 percent of their Title I, Part A funding over a period of several years.

In exchange for greater flexibility in the use of Title I funds for interventions, we will increase our oversight efforts to ensure the quality and efficiency of district improvement work in the

²⁸The District Standards and related indicators are available at: <http://www.doe.mass.edu/sda/review/district/StandardsIndicators.doc>

Level 3/Focus schools. For example:

- We will ensure interventions are funded based on the scale of the problem and implemented according to prescribed timelines, and we will track the expenditure of Title I funds on specific interventions across years;
- We will require our districts to specify the funding source if non-Title I funds are used in place of or in addition to Title I funds to meet the reservation requirement;
- We will only allow districts to amend their Title I grant application to reallocate unspent funds for interventions on a case-by-case basis and after careful scrutiny; and
- In some instances, we may require a district to carry over unspent funds for an intervention in a given year to fund the intervention in the following year or require that funds for interventions be expended over multiple years.

Examples of Interventions²⁹

The Conditions for School Effectiveness Self-Assessment is designed to be an in-depth examination of current practice that identifies areas of strength and highlights areas requiring intervention. The tool delineates the level of development of each condition along a continuum: *Little Evidence, Developing, Providing, and Sustaining*. District and school leaders, the regional District and School Assistance Center (DSAC), staff responsible for day-to-day instruction, and other key stakeholders will work together to use the self-assessment and other sources of information to prioritize those conditions requiring the most urgent attention and identify appropriate interventions. Interventions may be scaled based on need and availability of funds. For example, a district may redesign the school day to provide academic tutoring for a small focus population, or it may engage in a more comprehensive effort to provide a broad array of academic and/or enrichment opportunities for the entire school population.

Below are five sample scenarios that illustrate interventions that districts may select to address the needs of students in their Level 3/Focus schools.

1. A district redesigns the school day to facilitate *school-based learning communities* for teachers in its Level 3 school(s) to create peer-led support and accountability opportunities. Professional development requirements are raised, and teachers and school leaders work together to develop effective instructional practices, studying what actually works in classrooms. With the implementation of Massachusetts' new educator evaluation regulations, this intervention provides space and place for differentiated paths and plans for teacher growth and improvement depending on their career stage and performance, as well as their rating of practice and impact on student learning based on multiple measures. It may also include instructional

²⁹ The process for identifying and implementing interventions described in this section applies to all schools placed in Level 2, 3, and 4 on our framework for district accountability and assistance. The primary differences are the scope of the problem (e.g., districts with one or more Level 4 school must implement multiple interventions aligned to all 11 Conditions for School Effectiveness; those with Level 3 or Level 2 schools other levels may implement fewer, more targeted interventions to address specific areas of need) and the level of ESE engagement (e.g., districts with Level 2 schools have relative autonomy in selecting interventions; districts with Level 3 schools consult with the DSAC in selecting interventions and must present a proposal to ESE for approval; interventions in Level 4 schools require the Commissioner's approval as part of the redesign plan).

coaches who work with teachers to strengthen their skills in areas such as lesson planning, student data analysis and in-class pedagogy. This approach would strengthen teachers' professional practice and improve the quality of instruction. This intervention would be appropriate for elementary, middle, and high schools.

2. A district implements a *tiered system of support* focused on system-level change in classrooms, the entire Level 3/Focus school, or across a network of Title I schools to meet the academic and non-academic needs of all students, including students with disabilities, English language learners, and students who are academically advanced. The flexible tiers provide a robust and responsive educational environment that provides students with a continuum of multiple supports to meet their needs, with each tier providing an increased intensity of academic and non-academic supports. The movement and the intensity of support are based on data from universal screenings, assessments and progress monitoring, and the data drives the instructional decision-making throughout the process. The tiered system is supported by incorporating technology as an instructional tool and part of a data collection system. For English language learners, the system includes a model for conceptualizing academic language, a framework for effectively addressing the core components of English language acquisition and incorporating academic language in instructional practice, as well as a focus on mastery that will support these students' successful preparation for college and career. For students with disabilities, the system specifies how relevant information from each student's Individualized Education Plan (IEP) will be incorporated into the design and implementation of instruction and assessments to enable students eligible for special education services to fully access the system of tiered instruction and non-academic supports. This approach will help educators know how to provide appropriate levels of interventions for all students and triage supports to meet the needs of every student, especially students with disabilities, English learners, and low achieving students. This intervention would be appropriate for elementary, middle, and high schools.
3. A district provides *school-based services* to address the social, emotional, and health needs of the students in the Level 3/Focus school. The school and its parents jointly address the developmental needs of students early in their education; school teams composed of school nurses, counselors and teachers meet on a regular basis to discuss and address the challenges of individual students; students receive routine and preventative support and care. Students with acute health problems receive services in a timely manner; their health is monitored in a systematic way as they progress through school, and problems are addressed early that might otherwise impede their learning. As a consequence, the proportion of at-risk students declines as they progress through school. This method will boost student performance by addressing the issues in their lives outside the school context that may be affecting their ability to learn at school. Such an intervention would be highly appropriate for

elementary schools, but may also have applications for middle and high schools.

4. A district *redesigns the school day or year* (which may include time before school, after school, vacations, weekends, and summers) to provide a broad array of academic and/or enrichment opportunities to students in the Level 3/Focus school in addition to the learning experiences they already receive. This additional time is focused on a small set of clear and ambitious goals for student learning in which each student has a schedule and academic program tailored to address their individual needs, which may include tutoring and other academic supports. Students are provided with a broad array of enrichment opportunities that deepen their engagement in school in areas including the arts, foreign languages, hands-on science, business, community service learning, and leadership. This type of intervention will help to foster trusting relationships and a sense of belonging for students; engage them in activities and routines intended to reinforce school values, behaviors and attitudes necessary for success such as hard work, perseverance and responsibility; improve the transition from middle to high school; and promote youth leadership, 21st century skill development, and college and career readiness. Such an intervention would be appropriate for elementary, middle, or high schools, and could be targeted to address a subset of students within the school.

5. A district establishes a *coordinated early childhood education program* to provide young children likely to belong to the focus group in a Level 3/Focus school with the early learning experiences necessary to prepare them for the academic expectations of elementary school. Collaborative planning and decision-making structures exist between the district, its Level 3/Focus schools, and early childhood centers. An integrated professional development system is formed, providing early childhood and elementary school educators with frequent opportunities to collaborate and share information and data ensures aligned, age-appropriate learning experiences for students, and structured opportunities for education professionals in both sectors collaborate in helping families and educators identify children's needs early and refer them to appropriate services. Such a program may also employ an intergenerational component to help parents develop a home environment that supports their children's learning needs, provides opportunities to monitor the progress of their child and communicate with school personnel, and provides assistance to parents to tutor their children at home to reinforce work done in school. Such an intervention would be appropriate for elementary schools.

For any school (elementary, middle, or high school), the district may also identify one or more ESE-approved partner(s) to add value and capacity to the district and school in implementing the chosen interventions. (See section 2G for the process we will use for the rigorous review and approval of external providers to support the implementation of

interventions in priority and focus schools.) Potential partners could include technical assistance organizations, community-based organizations as part of our wraparound zone initiative, or a Commendation School in the region with demonstrated success in serving the focus population. (See section 2.C.iii for further detail.)

Evidence of Success in Similar Schools

The interventions described above are purposefully aligned to our *Conditions for School Effectiveness*. Our District Standards, in turn, specify those district-level systems and practices necessary to provide and/or support the implementation of these conditions in schools. In 2009, ESE contracted with the Regional Education Laboratory-Northeast and the Islands (REL-NEI) to provide evidence validating the *Conditions for School Effectiveness*. REL-NEI staff researched libraries, federal resources, and online databases to find rigorous and current research on each condition. The resulting document, the *Conditions for School Effectiveness Research Guide*, is available as a resource to help school and district leaders make sound decisions in selecting interventions aligned to priorities, evaluating them, and justifying their expense.³⁰

Based on evidence we have accumulated over the past two years in reviewing district and school plans that address the *Conditions for School Effectiveness*, we are now able to identify and disseminate information about interventions conducted successfully in schools with similar demographic and performance characteristics similar to our Level 3 schools. Specific examples include:

- We have developed a blueprint outlining a tiered system of supports. The *Massachusetts Tiered System of Support (MTSS)* describes the flexible tiers, the core academic and non-academic components of the system, and the larger framework of district supports.³¹ This system is aligned with our *District Standards and Indicators*, is one of our 11 *Conditions for School Effectiveness*, and provides the structure needed to develop the policies, practices, and procedures necessary to successfully implement such a system. We have compiled a growing list of presentations from districts and schools that illustrate how they implemented tiered systems of support to address students' academic and non-academic needs, especially the needs of students with disabilities and English language learners. For example, the Memorial Elementary School in Winchendon implemented literacy interventions for struggling readers with a focus on inclusion. The district implemented an uninterrupted 90-minute literacy block in which students are placed in flexible tiers based on data, students receive targeted instruction in specific skills, and progress monitoring is used to determine if students have reached their benchmark using instruments such as DIBELS (Dynamic Indicators of Basic Early Literacy Skills), GRADE (Group Reading Assessment and Diagnostic Evaluation), and the Fountas–Pinnell Benchmarking

³⁰ The Conditions for School Effectiveness Research Guide is posted at <http://www.doe.mass.edu/sda/framework/level4/ConditionResearchGuide.pdf>

³¹ An overview of our MTSS initiative, including how tiered systems of support align with and are supported by our *Conditions for School Effectiveness and District Standards*, is posted at <http://www.doe.mass.edu/mtss/>

Assessment System. The district provided a literacy coach for grades K–2, engaged staff in a graduate-level course on inclusion, engaged staff in book study, and trained all staff in the use of PBIS (Positive Behavioral Interventions and Supports). In the first year, the district saw a reduction in referrals for special education services, more than 80 percent of students progressed to the next school at benchmark, and staff reported an increase in student-centered collegial discussion.³²

- Our Expanded Learning Time (ELT) Initiative, now entering its sixth year of implementation in 19 schools, has provided us with compelling examples of how schools can redesign the school day or year to maximize time for core academics and provide a well rounded education for all students, particularly at-risk students. Massachusetts 2020, our partner in this initiative, has compiled a series of videos and case studies illustrating promising practices and lessons learned in our most successful ELT schools. For example, the Clarence Edwards Middle School in Boston significantly improved students’ math scores by adding a Math League program that engaged students in team-based math study and competitions for an additional four hours per week. Other ELT schools, such as the Silvia Elementary School in Fall River, have worked to integrate project-based learning into the school day, either within core academic classes or in theme-based electives such as forensics, zoology, weather, or engineering. Teachers in these schools have reported that the increase in project-based learning has resulted in deeper student engagement and improved understanding of core concepts. The Jacob Hiatt Magnet School, a preK-6, 475-student school in Worcester, partnered with more than 10 arts and cultural institutions to provide integrated enrichment programming across all grade levels. In addition to these success stories, Massachusetts 2020 has also compiled information on highly successful practices related to teacher planning and collaboration.³³

- For the past three years, our accountability office has undertaken a series of comprehensive district reviews to determine how effective their systems and practices have been at closing proficiency gaps between student groups in their schools.³⁴ Twenty-seven of these reviews have been completed to date. In 2009 we reviewed six districts where data pointed to responsive and flexible school systems that are effective in supporting all learners, particularly students with disabilities, or where there was an interest in making these systems more effective. In 2010 we reviewed 11 districts with Title I schools that advanced the performance of their English language learners, as measured by MCAS, at a greater rate than the statewide average for all English language learners statewide. In 2011 we reviewed 10 districts that substantially narrowed the proficiency gap for students from low income families

³² Additional information on Winchester and other presentations are posted at <http://www.doe.mass.edu/mtss/ta/presentations/>.

³³ Additional examples of the success of Expanded Learning Time are available at Massachusetts 2020’s website at <http://www.mass2020.org/node/12>

³⁴ The district review reports and related protocols posted at <http://www.doe.mass.edu/sda/review/district/>

for two consecutive years. Each review has contributed to a growing knowledge base about district systems, practices and interventions that can effectively serve low-achieving students.

- The state’s *Guidance and Promising Practices* and *Exploring Best Practices in Redesign* documents, originally developed to support the implementation of our *Conditions for School Effectiveness* in Level 4/Priority schools, provide valuable case studies of successful school turnaround efforts in Massachusetts and nationally. Each resource identifies key practices and interventions the districts and schools profiled in the case studies employed to achieve their reform goals; highlights existing connections between these practices and the *Conditions for School Effectiveness*, and provides links to additional aligned resources to help facilitate redesign and reform efforts.³⁵ These resources are designed to help school and district leaders maximize collaborative time for teachers and time on learning for students; make informed decisions in identifying partners; explore collective bargaining implications; identify, recruit, and hire outstanding staff; address students’ social, emotional, and health needs; and provide alternative English language education program scenarios for English learners, among other interventions.

The flexibility of the ESEA waiver will enable us to provide our districts with a differentiated recognition, accountability, and support system grounded in shared tools, processes, and resources, as well as a common language for discussing the interventions and supports we have learned are necessary to support the needs of our most struggling students.

- 2.E.iv Provide the criteria the SEA will use to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status and a justification for the criteria selected.

³⁵ A complete list of resources is posted at <http://www.doe.mass.edu/sda/framework/level4/>

A list of Level 3/Focus schools will be publicly released each year based on the four most recent years of data, with the previous year's data carrying the most weight.³⁶ We anticipate some movement in and out of this designation each year as prior years' data becomes less heavily weighted. Schools may exit Level 3/Focus School status by improving their performance such that they do not have the largest graduation or proficiency gaps or the lowest overall performance for their grade span. Because of the way the PPI is calculated, to move out of Level 3/Focus School status, schools will need to demonstrate sustained improvement over several years and should be on track for their progress to continue.

We will generate and release our first list of Level 3/Focus schools using the methodology described within this request for flexibility in August 2012, incorporating results from spring 2012.

³⁶ Schools may meet their AMO targets but still be classified as a Level 3/Focus School if they remain among the lowest performers relative to other schools in the state. This allows ESE to direct its resources and interventions to the lowest performing schools, even if they are meeting their targets.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOLS

Provide the SEA’s list of reward, priority, and focus schools using the Table 2 template. Use the key to indicate the criteria used to identify a school as a reward, priority, or focus school.

TABLE 2: REWARD, PRIORITY, AND FOCUS SCHOOL

LEA Name	School Name	School NCES ID #	REWARD SCHOOL	PRIORITY SCHOOL	FOCUS SCHOOL
<i>Ex. Washington</i>	<i>Oak HS</i>	<i>111111100001</i>		<i>C</i>	
	<i>Maple ES</i>	<i>111111100002</i>			<i>H</i>
<i>Adams</i>	<i>Willow MS</i>	<i>222222200001</i>	<i>A</i>		
	<i>Cedar HS</i>	<i>222222200002</i>			<i>F</i>
	<i>Elm HS</i>	<i>222222200003</i>			<i>G</i>
TOTAL # of Schools:					

Total # of Title I schools in the State: _____

Total # of Title I-participating high schools in the State with graduation rates less than 60%: _____

Key	
<p>Reward School Criteria:</p> <ul style="list-style-type: none"> A. Highest-performing school B. High-progress school <p>Priority School Criteria:</p> <ul style="list-style-type: none"> C. Among the lowest five percent of Title I schools in the State based on the proficiency and lack of progress of the “all students” group D. Title I-participating or Title I-eligible high school with graduation rate less than 60% over a number of years E. Tier I or Tier II SIG school implementing a school intervention model 	<p>Focus School Criteria:</p> <ul style="list-style-type: none"> F. Has the largest within-school gaps between the highest-achieving subgroup(s) and the lowest-achieving subgroup(s) or, at the high school level, has the largest within-school gaps in the graduation rate G. Has a subgroup or subgroups with low achievement or, at the high school level, a low graduation rate H. A Title I-participating high school with graduation rate less than 60% over a number of years that is not identified as a priority school

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE I SCHOOLS

- 2.F Describe how the SEA’s differentiated recognition, accountability, and support system will provide incentives and supports to ensure continuous improvement in other Title I schools that, based on the SEA’s new AMOs and other measures, are not making progress in improving student achievement and narrowing achievement gaps, and an explanation of how these incentives and supports are likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students.

Since 2009, Massachusetts has defined its approach to district engagement based on the premise that district accountability and ESE assistance must be closely linked to produce continuous and sustainable improvement. In our view, districts are only as strong as their weakest school, which is why we assign them to one of five levels corresponding with the level assigned to each district’s lowest performing school(s).³⁷ Those requiring minimal state intervention are placed in Level 1; those requiring the most intervention are placed in Level 5 (see illustration below).

Our state system of support enables us to provide comprehensive assistance to districts that is differentiated by need, provides structured opportunities for teachers, administrators and district leaders to engage in activities including coaching, action research, facilitated work teams, professional communities of practice, and resource networking. Our *Conditions for School Effectiveness* and our *District Standards and Indicators* provide processes and tools to support evidence-based practices across the Commonwealth.

Differentiated Recognition

We will commend schools for high performance, high progress, and for success in closing proficiency gaps. Our Commendation Schools will serve as demonstration sites for effective or promising practices, and many will receive incentives to collaborate with Level 3/Focus schools that have been unsuccessful in meeting the needs of their lowest achieving students.

There is an important distinction between the criteria required for identifying Reward Schools under this flexibility and how we propose to implement our Commendation School system: We see value in extending this recognition to Level 2 schools that are off track in meeting their AMOs but still show evidence of closing proficiency gaps among persistently low achieving student groups. The success of these schools will inform discussions around what it takes to support sustained improvement, and we believe this will increase the pool of schools from which educators can learn about and share promising practices.

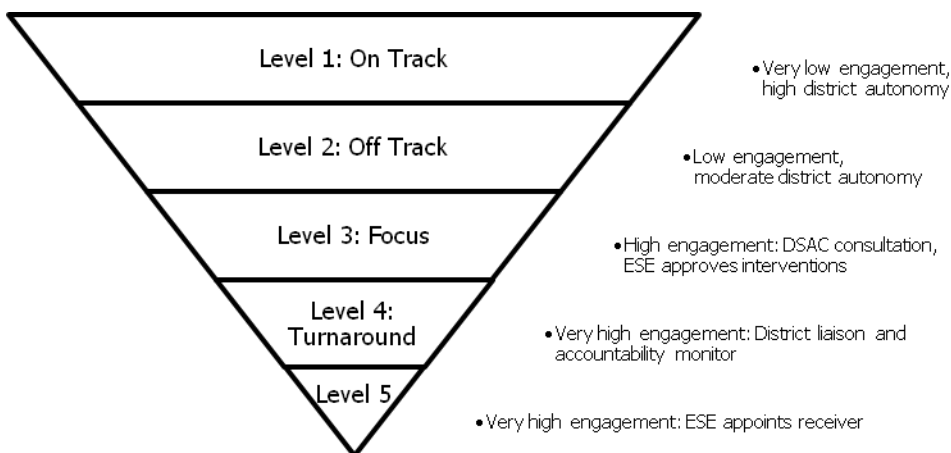
Differentiated Accountability

The amount of flexibility and autonomy each district receives is determined by its classification on the state accountability system.

³⁷ Exceptions occur when a separate district accountability review process or other information identifies persistent, pervasive issues with district governance or district-level systems. In these rare cases, the district may be identified as Level 4 even though all its schools perform at higher levels. Currently three Massachusetts districts fall into this category.

- Level 1 districts are granted considerable autonomy and flexibility and have access to the online tools and resources available to all LEAs.
- Level 2 districts are granted some autonomy but must perform an annual needs assessment based on the state’s *Conditions for School Effectiveness* to implement and/or improve conditions in their schools that are not effectively supporting the needs of all students.
- Level 3 districts receive priority assistance from the regional District and School Assistance Center (DSAC) and engage with the DSAC in both the needs assessment process and in the identification of interventions.
- Level 4 districts must rapidly implement all 11 *Conditions for School Effectiveness* in their Level 4 schools, are assigned a liaison from ESE to engage their leadership team in system-level analysis of district support activities, and are closely monitored for efficacy and impact.
- If a school is placed in Level 5, the most serious designation on our framework, we will engage a receiver to oversee management of the school.

The diagram below summarizes how accountability levels will relate to ESE supports and engagement.



Differentiated Supports

Our framework for district accountability and assistance provides an array of supports, services, and opportunities for schools and districts to engage in professional learning communities focused on establishing high expectations for all students, a common language to discuss school improvement efforts, and a knowledge base from which all educators can benefit.

We provide multiple *resources and tools*, many of which are available online, and are accessible for use by school and district leaders, other educators, school committees, and the public. To support the use of these tools we provide a network of *regional assistance* through our six District and School Assistance Centers (DSACs). In collaboration with partner organizations, DSACs use a regional approach to support self-assessment and planning, provide regional opportunities to learn about and share effective practices; and train, model, and facilitate the

use of our resources and tools. Districts have a strong incentive to participate in DSAC activities because they add value and needed capacity, provide customized professional development and other supports; and serve as a venue for networking opportunities. Further, the relationship between a DSAC and a district is collaborative, not evaluative, fostering trust and an atmosphere of support.

Each DSAC is led by a Regional Assistance Director (RAD), a recently retired superintendent selected based on his or her prior record of accomplishment. Most RADs have operated one or more districts in the region and brings a deep understanding of the local, civic, cultural, economic, and educational context and the ability to meaningfully engage local stakeholder groups in the work. The RAD works directly with the region’s superintendents, providing opportunities for honest conversations about strengths and needs. Each RAD is supported by a team that includes a former principal, a data specialist, a mathematics specialist, and a literacy specialist, with the availability of additional support from ESE specialists as needed. Each DSAC serves as a forum for regional networks of school and district teams on various topics, especially the education of English language learners and students with disabilities, and for developing strong instructional leaders.

Other available tools and resources include:

- The District Analysis and Review Tools (DARTs) report on more than 40 quantitative indicators to allow all stakeholders to gauge the overall health of school or district. Users can track pertinent data elements over time and make sound, meaningful comparisons to the Commonwealth or to comparable districts. The DARTs provide a snapshot of school and district trends and allows users to examine trends over the most recent five years of available data; view school- and district-level data on easily accessible graphical displays; reflect and self-evaluate; locate comparable schools and districts elsewhere in the state based on student characteristics; and make comparisons to enable a district to collaborate with a similar district that has shown promising trends.
- Online models and self-assessment tools for district and school improvement that are aligned with our 11 *Conditions for School Effectiveness* and six *District Standards and Indicators*;
- The Early Warning Indicator Index system, a data-driven system to identify high school students who are at risk of not graduating on time. We are using federal Longitudinal Data System Grant Program (LDS-2) funding to expand the system to identify K–12 students that are potentially off track for their grade level or developmental age, including those students who are not on track to graduate with their peers and are identified as potential dropouts.
- We provide targeted grants to enhance district and regional capacity to plan,

implement, and sustain practices to improve student performance that are aligned with the 11 *Conditions for School Effectiveness*. One of our goals as an agency is to guide school and district leaders to think more strategically about how best to maximize the various grants they receive, either through entitlement or competitive opportunities; ensure that grant resources are used in ways that directly contribute to attainment of agency goals; and create new practices within the agency itself to improve our practices around grant development, assessment, and award determination.

- The Commonwealth’s professional development programs will be scaled up through the DSACs, through train-the-trainer models, and through online webinars and courses. In addition, the quality of external professional development will be heightened through the establishment of new, more rigorous criteria for professional development providers in literacy and mathematics.
- Our foundational professional development course menu, offered through the DSACs and other sources, is designed to build educator effectiveness in five critical content areas: 1) instructional leadership, 2) sheltering content for English language learners, 3) inclusive instructional practices for students with disabilities, 4) mathematics, and 5) literacy.
- A Behavioral Health and Public Schools Self-Assessment Tool that allows districts and schools to evaluate their practices and strategies for supporting positive behavior and health of students. <http://bhps321.org/>.

Our *district liaisons* serve as project managers, and provide a direct communication link to ESE and coordinate support to the Commonwealth’s 10 largest urban districts to enhance their capacity to support every school, with a particular focus on their Level 4/Priority schools. Working with senior district leadership, the liaisons facilitate the development of professional learning communities in each school, support the use of multiple forms of data to inform system-wide action planning, and provide resources for systematic observation of classrooms, discussion of evidence, and action planning to improve teaching and learning and make effective use of collaborative planning time.

The senior leadership of the Center for Accountability and Targeted Assistance and the district liaisons further this work by convening a monthly meeting of the Urban Superintendents Network (USN). The USN is chaired by superintendents from three different regions of the state and provides leaders from 23 urban districts with an opportunity to share ideas, concerns, and solutions to common problems with each other. Commissioner Chester uses the USN as a resource to gain input on policy decisions, including pursuing this waiver opportunity, and practical implementation challenges such as implementing the educator evaluation framework.

As our districts progress towards the goal of halving the proficiency gap for all students, they will steadily progress toward the full implementation of the 11 *Conditions for School*

Effectiveness in all schools, with priority given to schools in Levels 3 and 4.

As shown in the table below, districts will be required to reserve up to 25 percent of their Title I, Part A funds to address identified needs. The *Conditions for School Effectiveness Self-Assessment* will be the primary instrument for identifying and prioritizing those needs, and the funding formerly set aside for public school choice, supplemental educational services, and required professional development will be used for the interventions and supports that address the identified needs.

Designation	Description	Title I Reservation
Level 1	On track: Schools meeting AMOs	Up to 1% ³⁸
Level 2	Off track: Low subgroup or aggregate performance	1 – 25% ³⁹
Level 3 (Focus)	Very low aggregate performance or large proficiency gaps (lowest performing 20% of schools)	1 – 25%
Level 4 (Priority)	Underperforming schools	1 – 25%
Level 5 (Priority)	Chronically underperforming schools	1 – 25%

³⁸ A district that receives a Title I, Part A allocation of greater than \$500,000 must reserve not less than 1% of its Title I, Part A allocation to carry out the provisions of section 1118, including promoting family literacy and parenting skills.

³⁹ The size of the reservation that will be required will be based on the scope of the problem the district has identified, the size of the focus school, and whether the district serves multiple focus schools.

2.G BUILD SEA, LEA, AND SCHOOL CAPACITY TO IMPROVE STUDENT LEARNING

- 2.G Describe the SEA’s process for building SEA, LEA, and school capacity to improve student learning in all schools and, in particular, in low-performing schools and schools with the largest achievement gaps, including through:
- i. timely and comprehensive monitoring of, and technical assistance for, LEA implementation of interventions in priority and focus schools;
 - ii. holding LEAs accountable for improving school and student performance, particularly for turning around their priority schools; and
 - iii. ensuring sufficient support for implementation of interventions in priority schools, focus schools, and other Title I schools identified under the SEA’s differentiated recognition, accountability, and support system (including through leveraging funds the LEA was previously required to reserve under ESEA section 1116(b)(10), SIG funds, and other Federal funds, as permitted, along with State and local resources).
- Explain how this process is likely to succeed in improving SEA, LEA, and school capacity.

The state’s district framework for accountability and assistance has established a coherent structure for linking ESE accountability and assistance activities with districts based on their level of need and has provided school and district leaders with common indicators and tools for diagnosing problems and identifying appropriate interventions. To guide this work we have developed two important tools:

- The *District Standards and Indicators* identify the characteristics of effective districts in supporting and sustaining school improvement.
- The *Conditions for School Effectiveness* identify those research-based practices that all schools, especially our most struggling schools, require to effectively meet the learning needs of all students. This tool also defines what each condition looks like when implemented purposefully and with fidelity.

As described in Section 2.F, our framework provides an array of supports, services, opportunities, and incentives for schools and districts to engage in professional learning communities focused on high expectations for all students, school and district improvement efforts, and the formation of a knowledge base from which all educators can build their capacity to support student learning.

The interventions in our Focus and Priority schools will be aligned to the *Conditions for School Effectiveness*, allowing us to compare the implementation of these interventions across all schools, between schools with similar demographic profiles and performance histories, and from classroom to classroom. This will provide state, district, and school leaders with a shared understanding of what is necessary to effectively achieve these conditions; where and when innovation should be encouraged and where consistency should be maintained; and

how scarce time, fiscal, material, and human resources can be allocated efficiently and effectively.

Our user-friendly, interactive data reporting tools like the District Analysis and Review Tool (DART), our School and District Profiles website, and our Education Data Warehouse also provide valuable information on leading indicators and student outcomes for all districts, schools, and student groups.

Using these data, our District and School Assistance Centers (DSACs) will give first priority for technical assistance to districts with Level 4/Priority and Level 3/Focus schools within their region. The DSACs will serve as a hub for engaging educators in professional learning communities, and our Commendation Schools will serve as demonstration sites to highlight promising and effective practices.

Our proposed system will hold districts accountable for improving their school and student performance. All districts, including those in Level 1, will be required to develop and implement an annual self-evaluation and district improvement planning process using our district standards and indicators, resulting in a three-year District Improvement Plan. This plan will be designed to improve performance, particularly in the Level 3/Focus and Level 4/Priority schools in these districts.

Currently every school annually adopts school performance goals and develops and implements a written School Improvement Plan to improve student performance. We propose no change to this requirement through this waiver request. Under state law the school and district improvement plans must be aligned with one another and be based on an analysis of data that includes but is not limited to student performance and the District Analysis and Review Tool (DART) provided by ESE, as well as an assessment of actions the district and its schools must take to improve that performance.

The accountability and assistance level of a district is determined by the level of its lowest performing school, and the level of ESE engagement and funding that may be required to implement interventions increases as the needs of one or more schools in the district increase.

Commendation Schools

As described in Section 2.C.iii, we will call our Reward schools “Commendation Schools.” These schools will be annually recognized through a state-level event to promote and celebrate their significant progress, high performance, and/or success in closing proficiency gaps and will receive a Commendation School certificate for display within the school.

Under this flexibility, our Commendation Schools will serve as demonstration sites within each DSAC for practices that are effective or show great promise. Dependent on funding availability, Commendation Schools will be eligible for a limited number of promising practice grants to encourage their involvement in networking activities and other efforts to

disseminate best practices and lessons learned. In particular, we will seek to foster close partnerships between Commendation Schools and Level 3/Focus schools that share similar demographic and performance profiles. Commendation Schools will be selected from schools that are in Levels 1 and 2, based on their progress and performance.

Level 1

Districts in which all schools are placed in Level 1 will be considered Level 1 districts, indicating that they are making steady progress toward full implementation of the *Conditions for School Effectiveness* while recognizing the need to continue to support all students. Most of these districts will not be required to reserve Title I, Part A funding for interventions or supports; those that receive more than \$500,000 will be required to reserve 1 percent for parent/guardian involvement. These districts will retain access to all of the resources and tools available to districts with more serious issues. A Level 1 school in a district with Level 2, 3, or 4 schools will receive the lowest priority for support and intervention.

Level 2

Districts where the most serious accountability level of any school is Level 2 will be considered Level 2 districts. This designation will require the district to assess the level of implementation of one or more of the *Conditions for School Effectiveness* in the Level 2 school(s) and provide the support necessary to increase their effectiveness. The district will be required to reserve a portion of its Title I, Part A allocation to fund interventions and supports that deepen the level of implementation. The district will be required to use the *Conditions for School Effectiveness Self-Assessment* to identify priorities but will retain the flexibility to decide which interventions to fund, based on its unique needs. A Level 2 school in a district with Level 3 or 4 schools will receive moderate priority for support and intervention. ESE will review all proposals to fund interventions in Level 2 schools prior to implementation.

Level 3/Focus

Districts with one or more Focus schools will be placed in Level 3. Designation as a Level 3/Focus School will serve as a clear sign that current practices are not working in a way that serves all students and that urgent and dramatic change is needed for, at a minimum, the focus population. All Level 3 districts must use the *Conditions for School Effectiveness Self-Assessment* to identify unmet conditions and revise their District Improvement Plan and School Improvement Plans to meet them.

Level 3 districts will be required to reserve a substantial portion of their Title I, Part A allocations to fund those interventions aligned to the *Conditions for School Effectiveness* most likely to have an immediate, positive impact on the focus population. In addition, districts will be required to evaluate the extent to which their own systems and processes anticipate and address issues including school staffing, instructional and operational needs, especially at their lowest performing schools.

Any district with one or more Level 3/Focus schools will receive priority assistance from the regional District and School Assistance Center (DSAC), and seek their counsel in using the *Conditions for School Effectiveness Self-Assessment* to identify priorities and interventions. Level 3 districts must present a proposal to ESE for review and approval prior to the implementation of interventions. These proposals will be subject to the requirements provided in Section 2.E.iii.

Level 4/Priority

Districts with one or more schools among the lowest performing 4 percent of schools in the state may be placed in Level 4. These districts will be required to reserve up to 25 percent of their Title I, Part A allocation and other funds (such as federal school improvement grant (Section 1003(g)) funding) to support interventions to rapidly implement all of the *Conditions for School Effectiveness* in its Level 4/Priority school(s). A description of the interventions aligned with the turnaround principles that district with Level 4/Priority schools will implement is provided in Section 2.D.iii.

ESE may appoint an assistance liaison to support any district placed in Level 4 to help in the development and implementation of a turnaround (redesign) plan for each of its Level 4 schools, along with an accountability expert to monitor whether the goals, benchmarks, and timetable in the redesign plan for each of the Level 4 schools are being met.

It is important to note that some districts may be placed in Level 4 because of concerns raised during a district accountability review process, even if their schools' performance is higher than Level 4. An assistance liaison will support these districts in district improvement planning to meet state regulations, and an accountability expert will monitor whether the goals, benchmarks, and timetable in the District Improvement Plan are being met.

Level 5/Priority

Districts with at least one Level 5/Priority school will be placed in Level 5, the most serious category in our accountability system, representing receivership. Like Level 4 schools, these will be considered Priority schools for the purpose of this flexibility.

The Commissioner may place a Level 4 school in Level 5 at the expiration of its redesign plan if the school has failed to improve as required by the goals, benchmarks, or timetable of its redesign plan; or if district conditions make it unlikely that the school will make significant improvement without a Level 5 designation. When a district is placed in level 5, the Commissioner will appoint a receiver for the district. The receiver (according to state law M.G.L. c. 69, § 1K) will retain all of the powers of the superintendent and school committee and full managerial and operational control of the district. Up to 25 percent of the district's Title I, Part A application may be used to fund interventions and supports at ESE's discretion.

Districts are independently eligible for placement in Level 5 on the basis of a district review; the report of an appointed accountability monitor; a follow-up review report; quantitative

indicators set out in state regulations; or failure of a Level 4 district to meet the ESE-approved benchmarks or goals in its improvement plan in a timely manner.

Identification of External Providers

In some cases, a district may seek to collaborate with one or more external providers to support the implementation of interventions in Level 3/Focus and Level 4/Priority schools. Under this flexibility, we propose to extend our current process to identify external providers to our Level 3/Focus schools. This will expand our state capacity to serve our lowest performing schools and districts with high quality interventions demonstrated to improve student outcomes.

We have issued a series of procurements, each with an emphasis on a particular Condition for School Effectiveness, to identify Priority Partners with a proven record of accomplishment and demonstrated effectiveness in accelerating school improvement. Interested providers may respond to these opportunities on a rolling basis. All applicants are put through a rigorous review process prior to being selected.

Five-person review teams that include external and internal reviewers with relevant expertise and experience review written proposals from potential providers. All review teams participate in a training session, facilitated by ESE, to orient them to the review process and to participate in a joint scoring activity. Submissions are evaluated through a two-tier review process, as described below, with only top scoring proposals moving to Tier Two.

In Tier One, a formal review of each proposal will be conducted using a standard process and scoring rubric to assess the following qualification areas: *Defined Theory of Action; Experience and Willingness to Collaborate for Turnaround; Ability to Build Capacity for Sustained Improvement; and Proven Outcomes-Based Measurement Plan*. A subset of the review team will read and score each proposal. The outcome of each review will include: 1) a Tier One evaluation score, based on the combined scores of the reviewers; 2) a summary of strengths and weaknesses; 3) a set of questions and/or areas for further clarification to be addressed. The full review team will convene after all proposals have been reviewed and scored by teams. The purpose will be to develop a shared understanding of each proposal's team score, strengths/weaknesses, and areas in need of further clarification; based on this information, the review team will come to agreement about which proposals will proceed to the Tier Two Evaluation.

For each proposal that advances to Tier Two, the review process will involve a thorough evaluation of the applicant's demonstrated record of effectiveness and financial capacity. In addition to the evidence submitted in the written proposal, customer reference interviews will be conducted by an ESE team member, using a standard protocol and reference interview rubric. The interviewer will score the results; detailed notes will be shared with one other member of the review team.

Based on the results of the Tier One and Two evaluations, external provider management teams with high scoring proposals will be asked to participate in an interview with the review team. The interview will include both standard and customized questions based on the review of written proposals and reference interviews to clarify key issues; solicit additional information; and evaluate the provider's understanding of the expectations for working with a Level 3 or Level 4 school. The management team may also be asked to submit an amended proposal that reflects the feedback and expectations shared by the review team during the interview.

The full review team will make recommendations for the selection of Priority Partners, based on the combined results of the Tier One and Tier Two evaluations and the management interviews.

Reducing burden and enhancing fiscal flexibility

We view this flexibility as an opportunity to add momentum to current initiatives designed to guide school and district leaders in developing their improvement plans while also sharply reducing the administrative burden the existing dual accountability systems currently create. The fiscal flexibility offered will also enhance this work by allowing our districts to use their fiscal resources more strategically.

Our state law already calls for a single three-year District Improvement Plan and annual action plans, and a single School Improvement Plan. Moreover, these plans must be aligned and must be based on an analysis of data, including but not limited to data on student performance, as well as an assessment of actions the district and its schools must take to improve that performance.

Under this flexibility, our existing integrated district and school planning cycle would replace the requirements for plans currently mandated under ESEA sections 1116(b) and 1116(c).

At present, districts must distribute 15 to 30-plus page local and school reports annually, as required under ESEA section 1116(c). The development and distribution of these report cards place an unnecessary burden on districts and schools. Their creation consumes valuable resources and the information they contain is dense, technical and of little use to parents, particularly those who cannot speak English. ESEA currently requires districts to send home at least seven different notifications to parents: the public school choice notification; the supplemental educational services (SES) notification; the report card; the district accountability status notification; the school accountability status notification; the right-to-know teacher qualification request; and the right-to-know notification of teachers not meeting highly qualified requirements.

We believe that report cards are duplicative, as we currently require districts to distribute MCAS Parent/Guardian Reports to the parents/guardians of every child participating in our assessment program (grades 3–8 and 10). These four-page reports give detailed, parent-

friendly information on student achievement in literacy, mathematics, and science and technology/engineering as compared to the child’s school, district, and state. MCAS Parent/Guardian Reports are produced by the state in the 10 most common languages spoken in Massachusetts homes.⁴⁰ In addition, we also require districts to send parent/guardian reports home with every child participating in our English learner assessment program (grades K–12). In both cases, the reports are produced at the state’s expense each fall and shipped to districts for distribution to parents.

Under this flexibility, our existing Parent/Guardian Reports would replace the report cards currently required under ESEA section 1116(c). We would adapt our reports to include the accountability and assistance level of the child’s school, what this designation means, and how parents/guardians can become involved in school and district improvement activities; and information about teacher quality and the right-to-know requirements regarding teacher qualifications. We would continue, however, to require our Title I schools to provide parents and guardians with timely notice when their child has been assigned or has been taught for four or more consecutive weeks by a teacher who is not highly qualified.

We believe this streamlined method of communicating information about student, school, district, and state performance will reduce duplication and unnecessary burden, allowing school and district leaders to save valuable time and resources. This method will also ensure that parents/guardians receive the information that will be most useful for them, presented in a clear and concise format and language.

With this proposal, we request a waiver of the requirements in ESEA sections 2141(a), (b), and (c) regarding highly qualified teacher improvement plans and the associated restrictions on the use of Title II-A and Title I, Part A funds. Flexibility from these requirements will allow ESE and our state’s school districts to focus fiscal and staff resources on the development and quality implementation of our new educator evaluation and support system, while reducing the burden that would come with implementing mandates that do not align with current efforts.

We further propose to use the flexibility offered to transfer funding from authorized programs into Title I, Part A and the optional flexibility to repurpose the 21st Century Community Learning Center funds. Conversations with district leaders and other stakeholders made clear that the freedom to think differently about these funding sources will allow the state and districts to enhance the Commonwealth’s already strong record of achieving college and career readiness for its students, a meaningful system of accountability and supports, and effective instruction and leadership in our public schools. It will also potentially allow the state to streamline and better coordinate grant application processes and reduce burden on districts.

In addition, Massachusetts is interested in ways that federal funds might leverage state and

⁴⁰ A recent survey found that this is more languages than any other state.

local revenue sources to encourage the implementation of strategies that have a strong likelihood of accelerating student progress. Toward this end, the Commonwealth plans to make some Title I, Title II-A, and 21st Century Community Learning Center funds available contingent on local district revenue matching to support activities such as: an expanded instructional day and/or instructional year; year-round school calendar; targeted teacher training for high need areas (e.g., working with ELLs, STEM subjects); differentiated staffing designed to provide differentiated academic interventions for students; expanded social, emotional, and health supports and interventions; differentiated compensation tied to productivity and responsibility; and job-embedded teacher and administrator development tied to productivity goals.

PRINCIPLE 3: SUPPORTING EFFECTIVE INSTRUCTION AND LEADERSHIP

3.A DEVELOP AND ADOPT GUIDELINES FOR LOCAL TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

Select the option that pertains to the SEA and provide the corresponding description and evidence, as appropriate, for the option selected.

Option A	Option B	Option C
<input type="checkbox"/> If the SEA has not already developed any guidelines consistent with Principle 3, provide: <ol style="list-style-type: none"> i. the SEA’s plan to develop and adopt guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year; ii. a description of the process the SEA will use to involve teachers and principals in the development of these guidelines; and iii. an assurance that the SEA will submit to the Department a copy of the guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14). 	<input type="checkbox"/> If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide: <ol style="list-style-type: none"> i. a copy of any guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); iii. the SEA’s plan to develop and adopt the remaining guidelines for local teacher and principal evaluation and support systems by the end of the 2011–2012 school year; iv. a description of the process used to involve teachers and principals in the development of the 	<input checked="" type="checkbox"/> If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide: <ol style="list-style-type: none"> i. a copy of the guidelines the SEA has adopted (Attachment 10) and an explanation of how these guidelines are likely to lead to the development of evaluation and support systems that improve student achievement and the quality of instruction for students; ii. evidence of the adoption of the guidelines (Attachment 11); and iii. a description of the process the SEA used to involve teachers and principals in the development of these guidelines.

	<p>adopted guidelines and the process to continue their involvement in developing any remaining guidelines; and</p> <p>v. an assurance that the SEA will submit to the Department a copy of the remaining guidelines that it will adopt by the end of the 2011–2012 school year (see Assurance 14).</p>	
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

Even the best, most experienced educators need to be regularly evaluated to ensure that their strengths are recognized and enhanced and their weaknesses are identified and supported to ensure future success in the classroom. Research demonstrates that looking at student achievement impacts is an important and valid way of measuring teacher effectiveness, and that these measures are strengthened when they are used in conjunction with well designed classroom observations and well trained principals or mentors.

On June 28, 2011, the Massachusetts Board of Elementary and Secondary Education (BESE) approved new state regulations on educator evaluation (603 CMR 35.00) to provide every school committee with the tools to hold all educators accountable for their performance and enable them to help all students perform at high levels. The regulations require that school committees establish a rigorous and comprehensive evaluation process for teachers and administrators based on the state’s new principles of evaluation. (See Attachment 10 for regulations, and see Attachment 11 for minutes from the June 2011 BESE meeting.)

The new regulations apply to both administrators and teachers throughout the state and are designed to:

- Promote growth and development among leaders and teachers;
- Place student learning at the center, using multiple measures of student learning, growth, and achievement;
- Recognize excellence in teaching and leading;
- Set a high bar for professional teaching status; and
- Shorten timelines for improvement.

The development of the state’s new educator evaluation regulations took more than a year, involved a newly established 40-member state task force on educator evaluation, and included public discussions at eight Board meetings, robust and ongoing public outreach efforts, and a regulatory comment period.

These new regulations represent a significant change in Massachusetts, where educator evaluations have long been done at the discretion of the local district. While the state established principles to guide the evaluation process, evaluation systems were entirely developed and bargained locally, with wide variation in process, consistency, rigor, and effectiveness. The new state framework and model system, described in section 3B, offer the opportunity for a more coherent, fair, and useful evaluation system for all of Massachusetts' educators.

The BESE first adopted educator effectiveness as one of its five strategic goals in August 2008. Educator effectiveness is also at the core of Massachusetts' Race to the Top goals and strategies, and between 2010 and 2011 the Board's focus on evaluation intensified, beginning with a May 2010 discussion that established a statewide task force on educator evaluation and set parameters for prospective changes to regulations. The task force met regularly for seven months and included representatives from key stakeholder groups, practitioners, business representatives, experts in evaluation, psychometrics and statistics, and a student representative. Throughout their deliberations the BESE received regular updates on progress and discussions, with educator evaluation discussed at eight Board meetings between May 2010 and May 2011.

In March 2011 the task force presented its report and recommendations to the Board. In its report, the task force noted that evaluation practices statewide were extremely uneven and were not accomplishing the goals of supporting professional growth, accountability, and systemic improvement. The task force called for a "breakthrough" in educator evaluation that would only be possible through greater statewide consistency in evaluation standards, practices, ratings, and other design features, such as self-reflection and goal setting. These components, along with additional features designed to make student learning a more central part of educator evaluation, were key elements of the initial regulations that the Commissioner proposed to the Board in April 2011.

In the spring of 2011 the Massachusetts Department of Elementary and Secondary Education (ESE) staff met with more than 500 educators and other stakeholders to explain the proposed regulations. ESE also sponsored six regional forums across the state for teachers, administrators, and other stakeholders to learn about the proposed educator evaluation regulations and provide feedback. Of the nearly 800 educators and other stakeholders who attended these forums, 51 percent were teachers, 42 percent were administrators, and 7 percent were other stakeholders. Attendees were invited to share their views through question and answer sessions and electronically, using audience response technology.

When asked how useful their past evaluations have been in improving their practice as an educator, just 11 percent reported that evaluations were very useful, 56 percent said they were somewhat useful, and 43 percent said evaluations were not useful at all. Other highlights:

- Nearly nine of 10 respondents supported including educator self-reflection and self-assessment (25% somewhat support; 64% strongly support).
- More than eight of 10 respondents supported including goals for improving educator practice (23% somewhat support; 59% strongly support).
- More than three of four respondents supported including goals for improving student growth and learning (25% somewhat support; 52% strongly support).
- Two-thirds of the respondents supported including multiple measures of student learning and growth in educator evaluations (21% somewhat support; 46% strongly support).

Prior to the public release of the preliminary regulations in April 2011, ESE held a regulatory public comment period and received more than 500 written comments by the June deadline. Comments ranged from detailed substantive critiques to suggestions for fine-tuning and word changes to statements of support or straight opposition to the new regulations.

Overall, the feedback received during the comment period reflected significant interest in and support for the reform of the state’s educator evaluation system. Supporters indicated their interest was driven by a range of issues, including a desire for change; support for prioritizing student learning and professional growth; concern about the implementation challenge for school districts or educators; and the desire for guidance in determining educator impact on student growth in all grades and subjects (especially non-MCAS grades and subjects), as well as for specialist fields.

Collectively, both the formal regulatory comment and the informal feedback informed and helped to refine the final regulations that the Commissioner proposed to the BESE in June 2011.

As ESE proceeds with implementation in our Level 4 (turnaround) and early adopter districts this year and prepares for implementation in all Race to the Top districts in 2012–13, we continue to involve teachers and administrators in developing and refining our evaluation instruments and tools. We regularly gather feedback at all information sessions and professional development opportunities for districts, and we frequently post updated drafts to our website to allow a broader group of stakeholders to comment. We have found this collaboration essential for ensuring that our approach to evaluation is valuable to all educators and produces feedback that is reliable, fair and actionable.

3.B ENSURE LEAs IMPLEMENT TEACHER AND PRINCIPAL EVALUATION AND SUPPORT SYSTEMS

- 3.B Provide the SEA’s process for ensuring that each LEA develops, adopts, pilots, and implements, with the involvement of teachers and principals, including mechanisms to review, revise, and improve, high-quality teacher and principal evaluation and support systems consistent with the SEA’s adopted guidelines.

General Overview and Implementation Timeline

Since the Board of Elementary and Secondary Education (BESE) adopted new regulations on the evaluation of educators in June 2011, Massachusetts has been deeply engaged in developing and implementing a new statewide system for educator evaluation and support.

Implementation began almost immediately in fall 2011 in the state’s 34 lowest performing (Level 4) schools, at an additional high school receiving a federal School Improvement (Section 1003(g)) grant, and in 11 districts and four educational collaboratives whose applications to serve as early adopter sites were accepted in summer 2011. Implementation is scheduled to begin in Massachusetts’ 258 Race to the Top districts (66 percent of all public school districts) in the fall of 2012 and in remaining districts in the fall of 2013.

Evaluation Framework Overview

The evaluation regulations call for two judgments annually to be made for each teacher and administrator. The evaluator classifies the teacher or administrator’s “professional practice” into one of four ratings: Exemplary, Proficient, Needs Improvement, or Unsatisfactory. This classification takes into account classroom observations, artifacts of instruction, contribution to the professional culture, and student (in the case of teachers) and teacher (in the case of administrators) feedback.

The second judgment determines whether the educator’s impact on student learning is low, moderate, or high. This judgment is arrived at through the state MCAS growth results where they are available and at least one other district-wide measure of achievement.

The intersection of the two judgments determines the consequences for the individual being evaluated. Strong ratings and at least moderate impact on student performance is the expectation. Where the rating or professional practice is less than Proficient, the educator is placed on a one-year improvement plan with goals for student learning and educator practice. Failure to improve substantially after the year can lead to dismissal. A strong practice rating coupled with low impact on student achievement results in (a) a one-year improvement plan that focuses on the discrepancy between the two judgments and (b) requires the intervention of the evaluator’s supervisor.

Support for Effective Implementation

ESE is committed to supporting and monitoring the effective implementation of these new regulations. In June 2011 ESE secured the services of AIR/Learning Points Associates to partner in the design and piloting of the state’s implementation support strategy. The educator evaluation project leads for ESE and AIR/Learning Points Associates are working closely with the newly formed Leadership Steering Committee (LSC) an ESE team charged with designing,

piloting, implementing and monitoring the state’s new educator evaluation regulations. The team is utilizing ESE’s delivery and project management processes to develop a robust strategy, track specific details of its implementation, and monitor district execution. ESE also plans to work with another vendor to conduct a formative and summative evaluation of the agency’s implementation support efforts as well as districts’ implementation over the next three years.

We recognize that implementation of this new system will be difficult and have begun working closely with districts to support their planning and development. In the summer of 2011 ESE worked with teachers, administrators, district leaders and union presidents in Level 4 schools and districts to provide the tools and guidance necessary for them to develop their new evaluation systems. ESE has convened the early adopter districts, held its first face-to-face meeting of their leadership teams on October 12, 2011, and shared the Level 4 school implementation guide as a first step to securing feedback that will be incorporated into the implementation guide scheduled for statewide distribution in January 2012. With the continued assistance of AIR/Learning Points Associates, ESE will engage in ongoing implementation support over the next several years, using a portion of Massachusetts' Race to the Top (RTTT) funds.

As part of our ongoing support we are developing a range of materials for districts to use in building and implementing their own evaluation systems, including:

- A comprehensive overview of the regulations, their key components, and a timeline for implementation;
- PowerPoint presentations with notes that district and school leaders can use to introduce the regulations to a variety of audiences, and deepen practitioners’ understanding of key components. These will include rubrics for self-assessment, setting goals for professional practice and student learning, and using multiple measures of student learning;
- A website to serve as a central repository for information, resources, and tools⁴¹
- Regularly updated frequently asked questions posted on the website;
- A regularly monitored email box through which stakeholders can pose questions and offer suggestions;
- Components of the model system for implementing the regulations, as they are developed (see below);
- An implementation guide to support implementation of each component of the model system; and
- Guidelines for securing approval of adaptations or alternatives to each component of the state’s model system for educator evaluation.

Model System

The state plans to develop and roll out a model evaluation system and a variety of rubrics by January 2012 to provide the maximum support to districts as they begin the complex process of

⁴¹ www.doe.mass.edu/eeval/

redesigning their evaluation systems.

A key piece of the model system will be the rubrics that districts use to assess educators on the standards and indicators contained in the new regulations. The rubrics define four levels of performance (exemplary, proficient, needs improvement, and unsatisfactory) for each of the standards and clearly spell out what each performance level would look like in practice. They support a common understanding across evaluators of proficient and exemplary practice and serve as the tool by which evaluators organize the evidence they collect on an educator's performance.

Districts may adopt ESE's model rubric, adapt them to meet their local needs, or propose an alternative that is comparable in rigor and comprehensiveness. ESE has drafted classroom teacher and principal rubrics for use by Level 4 schools and early adopters in 2011–12 and will release updated versions and role-specific rubrics (e.g., for counselors, caseload educators, superintendents) developed in collaboration with representatives of statewide associations such as the Massachusetts School Counselors Association (MASCA).

These updated and new role-specific rubrics will be rolled out in January 2012 as part of a statewide webinar to release key components of ESE's model system for implementing the regulations. Other components will include draft contract language, protocols for principal and superintendent evaluation, and forms, templates, and tools for implementing the protocols.

The model system and accompanying comprehensive implementation guide are being developed through the Department's ongoing work with Level 4 districts and early adopters, state associations, and in-state and national experts.

The release of the model system is the statewide implementation kick-off and will be immediately followed by a series of regional Getting Started sessions for district teams comprised of superintendents, school committee chairs or vice chair, union president(s), district human resources administrators and principals. At these workshops, district teams will learn more of the details of the scope and timetable for ESE support.

For many this will represent a tremendous change in practice and policy. ESE is committed to working closely with districts to ensure effective implementation that meets the intent of the new regulations and provide educators with the useful feedback and support they need to improve and strengthen their practice.

Rating Educator Impact on Student Learning

All educators are required to be evaluated using at least two measures of student learning. Their impact on student growth will be rated on a scale of high, moderate, or low based on state assessments (when available) and at least one other district-determined measure common across grades or subjects district-wide, such as student portfolios, capstone projects, and performances. When relevant state assessment data is not available, at least two district-

determined measures will be used. These ratings will be used to determine the type of plan necessary to guide each educator's further development.

Precisely what these district-determined measures will look like is still being determined, and by July 2012 ESE will develop and disseminate guidance and tools for their development, as well as guidance on how to use these measures, plus state assessment data when available, to rate educator impact on student learning and growth.

Using Student, Parent, and Staff Feedback

In developing the state's new regulations, the task force recognized that information from a wide variety of sources, such as students, teachers, and parents, is invaluable in gaining a full picture of each educator's performance.

The new regulations call for the use of student feedback for teacher evaluations, and staff feedback for administrator evaluations. Recognizing that there are complex issues to consider in collecting and making effective use of this type of feedback, the regulations do not require this feedback to be used right away. Consistent with the regulations, by July 2013, ESE will develop and disseminate guidance and tools for using student and, possibly, parent feedback, along with staff feedback (for administrators) in evaluations.

Ensuring Effective and Consistent Implementation

Massachusetts' educator evaluation framework was carefully designed to balance the need for statewide consistency with local district autonomy. Beginning in January 2012 districts will have the flexibility to either adopt the model system, adapt the model system to meet local conditions, or modify their own evaluation systems consistent with the principles of Massachusetts' framework.

In addition, districts will be responsible for determining which additional, non-state required measures should be used to rate educator impact on student learning, such as student portfolios, capstone projects, and performances. While the framework does not supersede collective bargaining, local agreements must be entirely consistent with the principles articulated in the regulations. ESE is currently developing model contract language as part of its model system.

ESE will collect and analyze evaluation data from districts annually to ensure that the evaluation system is being implemented effectively statewide. Beginning in summer 2012, districts will also be required to submit their proposed educator evaluation systems and collective bargaining agreements to ESE for review. The Leadership Steering Committee is developing the process and criteria for these reviews. The results will be publicly reported by ESE, enhancing the transparency of this effort. A detailed timeline for key state and district implementation requirements follows.

January 10, 2012	ESE issues Model System forms, templates, and guidance; RTTT districts begin collective bargaining at the local level
June 2012	ESE provides guidance on district-determined measures of student learning, growth, and achievement
Summer 2012	RTTT districts submit their proposed educator evaluation systems to ESE for review, including collective bargaining agreements
September 2012	RTTT districts implement educator evaluation and begin to identify district-determined measures of student learning
By January 2013	All remaining districts begin collective bargaining
May 2013	ESE issues direction on gathering student and staff feedback; ESE reports to the Board on feasibility of parent feedback
By August 2013	All districts submit plans for district-determined measures of student learning to ESE
September 2013	All districts implement educator evaluation

SAMPLE FORMAT FOR PLAN

Below is one example of a format an SEA may use to provide a plan to meet a particular principle in the *ESEA Flexibility*.

Key Milestone or Activity	Detailed Timeline	Party or Parties Responsible	Evidence (Attachment)	Resources (e.g., staff time, additional funding)	Significant Obstacles