KENTUCKY ESEA FLEXIBILITY REQUEST

REVISED APPROVED SUBMISSION WITH AMENDMENTS TO PRINCIPLES 1 AND 2 SEPTEMBER 28, 2012

Revised September 28, 2011

This document replaces the previous version, issued September 23, 2011.
U.S. Department of Education
Washington, DC 20202

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

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COVER SHEET FOR ESEA FLEXIBILITY REQUEST

Legal Name of Requester: Kentucky Department of Education	Requester's Mailing Address: 500 Mero Street, 1st Floor, Capital Plaza Tower, Frankfort, KY 40601
State Contact for the ESEA Flexibility Request: Name: Mary Ann Miller Position and Office: Policy Advisor, Office of the Commissioner Contact's Mailing Address: Kentucky Department of Education, 500 Mero Street, 1st Floor, Capital Plaza Tower, Frankfort, KY 40601 Telephone: (502) 564-3141 Fax: (502) 564- 5680 Email address: maryann.miller@education.ky.gov	
Chief State School Officer (Printed Name): Terry Holliday	Telephone: (502) 564-3141
Signature of the Chief State School Officer: X_____	Date: 9/28/12
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 school-wide 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.

Guidance Question: Did the SEA meaningfully engage and solicit input on its request from teachers and their representatives?

Kentucky's Senate Bill 1 (SB 1), passed in the 2009 session of the General Assembly, mandated that a new assessment and accountability system be developed and implemented for the 2011-12 school year. This piece of legislation, which passed without opposition, was the result of months of collaboration between legislators, educators, state officials, partners and constituents. The Kentucky Department of Education (KDE) began communicating about its plans and work for this new system within weeks after the bill was signed into law. The following is a summary of the wide-ranging communication efforts on Kentucky's new assessment and accountability system, Unbridled Learning, College- and Career-Ready for All, which clearly illustrates that teachers and their representatives were consulted as the new system was developed.

In May 2009, the Kentucky Board of Education had its first public discussions of the required new system. Throughout the summer of 2009, the board worked to revise state regulations related to assessment and accountability, and as part of that process, gathered input from teachers through public hearings, face-to-face communications, e-mail and other methods. Updates also were provided to the agency's advisory groups, specifically the **Teachers Advisory Council**, the membership of which is comprised of a diverse group from school districts across the state.

Another group consulted during this process was the **School Curriculum, Assessment and Accountability Council (SCAAC),** a statutorily required advisory group, which includes **teacher representatives** in its membership. The **Kentucky Education Association** also provided input on a regular basis, and a representative of that association attends each Kentucky Board of Education meeting. Additionally, the state's National Technical Advisory Panel on Assessment and Accountability (NTAPAA), a panel of psychometric experts, regularly provided advice as the model was developed.

In December 2010, the Kentucky Board of Education adopted a document entitled *Goals and Guiding Principles for Accountability in Kentucky's Public Education System*. This document provided an overview of the next generation of assessment and accountability, serving as a foundation piece on which decisions were to be made regarding the new public school accountability model required by SB 1. The *Goals and Guiding Principles* document appears as Attachment 13 on page 124 of the Appendix.

The first version of a proposed school/district accountability model was developed in December 2010 and shared with the Kentucky Board of Education, partners, teachers, administrators and the general public in the form of a white paper. **From its inception to the present, the white paper describing the model has undergone 17 revisions and thus represents all of the changes that have been made to the model due to extensive input from teachers, principals, superintendents, advisory councils, legislators, partners, education advocacy groups and the public.** The model is based on the Council of Chief State School Officers' (CCSSO's) guiding principles for next-generation accountability systems as follows:

- alignment of performance goals to college- and career-ready standards
- annual determinations for each school and district
- focus on student outcomes
- continued commitment to disaggregation
- reporting of timely, actionable and accessible data
- deeper diagnostic reviews
- building school and district capacity
- targeting the lowest-performing schools
- innovation, evaluation and continuous improvement

The most recent version of the white paper describing Kentucky's accountability model, titled "Unbridled Learning Accountability Model," appears as Attachment 14 on page 129 of the Appendix.

KDE also worked closely with the Council on Postsecondary Education (CPE), which represents and oversees the state's college and university system, and the Education Professional Standards Board (EPSB), which oversees educator certification. Since Senate Bill 1 mandates specific deliverables and actions from all three agencies, and because of Kentucky's heightened focus on college/career readiness and teacher preparation, the collaboration between KDE, CPE and EPSB is a natural fit.

In November 2009, the U.S. Department of Education announced guidelines for the federal Race to the Top competition. Kentucky immediately began work on its application for those funds, using the work related to SB 1 and the proposed accountability model as the core. KDE's Race to the Top application process included securing signatures from local school board chairs, superintendents and **teacher organizations** to support the state's application. Signatures were received from all 174 school districts and included **representatives of the Kentucky Education Association and local teachers' unions**. Also, KDE initiated a **survey of teachers and administrators** in October 2009 to get their input on the state's vision and plans for public education specific to the Race to the Top application.

Kentucky Education Commissioner Terry Holliday appointed a **teacher effectiveness steering committee** to follow up from the state's Race to the Top application. This group was comprised of **teachers, principals, superintendents and other key stakeholders**, and its efforts led directly to the Teacher and Principal Effectiveness Frameworks (Attachment 23 on page 223 of the Appendix) with multiple measures that comprise Kentucky's Professional Growth and Effectiveness System.

The Race to the Top application also formed the core of the agency's Unbridled Learning initiative, which serves as an umbrella for the next generation of teaching, learning, assessment and accountability. KDE's strategic planning process became focused on the deliverables in SB 1 and the Race to the Top application, with the ultimate goals of college/career readiness for all students and improving the quality of leadership, instruction and student learning.

In the fall of 2009 and winter of 2009-10, KDE convened **workgroups of teachers** across the state to review the draft standards, provide feedback and suggest improvements. The groups also compared the state's current academic standards to the new Common Core Standards to help in the development of "crosswalks" between the two sets of standards. Kentucky's adoption of the Common Core Academic Standards in February 2010 began a process in which teachers were heavily involved in the design and implementation of curriculum and training materials. Since SB 1 also mandated new academic standards, and the new assessment and accountability system is directly tied to those standards, teachers' input was crucial in this work.

Professional learning communities (PLCs), **groups of practitioners** that meet and continuously connect regarding specific areas of education practice, were and continue to be a key component in Kentucky's standards, assessment and accountability work. The PLCs provide a means by which teachers, administrators and other professionals come together to learn, share, critique and process new information within a supportive, district/school-created community.

The state's regional **Leadership Networks** also played and continue to play a key role in the work around standards, assessment and accountability. These networks are intended to build the capacity of each school district as they implement Kentucky's new Core Academic Standards, develop assessment literacy among all teachers and work toward ensuring that every student is college- and career- ready.

For a complete listing of how teachers and their representatives, as well as other education constituents, were involved in the development of Kentucky's assessment and accountability system and waiver request, go to Attachment 15 on page 144 of the Appendix.

From its inception in December 2010, the proposed accountability model was revised based on feedback from teachers individually and as members of groups such as the School Curriculum, Assessment and Accountability Council and the Leadership Networks. **Specific changes suggested by teachers occurred to the subject-area tests, end-of-course exams, Program Reviews and teacher/leader effectiveness portions of the model.**

The Teacher and Principal Effectiveness Steering Committees, whose members include teachers, college and university representatives, parents, principals and superintendents from volunteer districts and also represent the Kentucky Association of School Administrators (KASA), Kentucky School Boards Association (KSBA), Kentucky Education Association (KEA), Jefferson County Teachers Association (JCTA), Council on Postsecondary Education (CPE) and Education Professional Standards Board (EPSB), were convened and met throughout 2011 to design the teacher/leader evaluation system. **These groups identified the characteristics of good teaching and leadership practice, and their work is ongoing in order to determine the**

final details of the teacher/leader evaluation system.

The draft waiver request and the Appendix, with information on how to provide input, were posted in the Unbridled Learning section of the Kentucky Department of Education website on October 28, 2011. The availability of the documents for review was communicated via e-mail and news release to the **State Committee of Practitioners, superintendents, local boards of education, principals, teachers, school staff, parents, legislators, education partners and the general public**.

Documentation of the official notice of the waiver request and opportunity to comment on it to LEAs can be found in Attachment 1 on page 1 of the Appendix. Comments received from educators and others can be found in Attachment 2 on page 6 of the Appendix. Notice of the waiver request and the opportunity to comment for the public can be found in Attachment 3 on page 30 of the Appendix.

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.

Guidance Question: Did the SEA meaningfully engage and solicit input on its request from other diverse communities?

The Kentucky Department of Education (KDE) has engaged in deliberate outreach efforts to reach all of its "customers" and audiences about the need to focus on the commitment to college and career readiness, the new assessment and accountability system and the waiver request.

In February 2011, Commissioner Holliday issued a call to **public school district superintendents and local board of education chairs** to sign a pledge to improve college and career readiness in their high schools. Holliday sent letters to superintendents and board of education chairs, asking them to pledge to increase the rates of college and career readiness in their high schools by 50 percent by 2015. The "Commonwealth Commitment to College and Career Readiness" pledge includes a goal statement designed to be tailored to each school district. This pledge mirrors the requirements of SB 1 related to the reduction of the need for remediation of high school graduates entering college. **Pledges were received from all of the state's school districts.**

On October 6, 2011, the **Commissioner's Raising Achievement/Closing Gaps Council** (CRACGC) met, and the meeting agenda featured a review of the new accountability system and recently-released test score data. The group looked at the impact of the prior accountability system on identifying and closing achievement gaps, then discussed the implications of the new accountability system and the waiver proposal.

Other outreach activities offering input into the development of Kentucky's new assessment and accountability system and the waiver include:

- presentations at meetings of **Kentucky's eight regional educational cooperatives**, each

composed of local school district superintendents
- articles and informational items in KDE's publication ***Kentucky Teacher***, which is designed as a professional development tool for **teachers**
- webcasts for **teachers and administrators** that provide opportunities for real-time input
- frequent e-mail messages to **educators, partners, legislators, media representatives and others** focused on the building of the new system
- **blog postings** related to NCLB, assessment, accountability and other related items
- **news articles and editorials** about the new assessment and accountability system

For a complete listing of outreach efforts, see Attachment 15, page 144 of the Appendix.

Additionally, **letters of support for Kentucky's ESEA waiver request** were received from 16 education groups from across the state including **six educational cooperatives (representing superintendents)**, **Kentucky Association of School Administrators**, **Kentucky Association of School Superintendents**, **Kentucky Education Association (statewide teachers' organization)**, **Jefferson County Teachers Association** (union representing teachers in Kentucky's largest district), **Education Professional Standards Board** (board overseeing teacher certification), **Council on Postsecondary Education** (agency overseeing higher education), **Kentucky Association of School Councils**, **Kentucky School Boards Association**, **Kentucky Association of Professional Educators** and **Prichard Committee for Academic Excellence**. See Attachment 12, page 108 in the Appendix for these letters of support.

The agency continues to offer outreach opportunities related to assessment, accountability and standards, with **webcasts** held on October 19 and targeting several of the **commissioner of education's advisory groups (superintendents, State Committee of Practitioners, closing achievement gap, parents, special education and gifted)**, a **formal survey of advisory groups** to gather input on the state's request for NCLB flexibility, a **meeting** with **superintendents** in late October, a November 8 **WebEx** with the **National Technical Advisory Panel on Assessment and Accountability (NTAPAA)** and a meeting with the **Teachers Advisory Council** in early November to put the final touches on the request.

In late October, the commissioner of education also announced the formation of a Student Advisory Council, the membership of which will include students in grades 10-12, with geographic, ethnic and economic representation. The initial group of students will serve through the end of the 2011-12 school year and participate in face-to-face and virtual meetings to share, provide feedback, make suggestions for potential improvement in their schools and statewide, and to give a "student voice" to the Unbridled Learning work.

Input from diverse stakeholders was used to make changes to the proposed accountability model and waiver request as follows:

- School Curriculum, Assessment and Accountability Council (SCAAC) -- provided input on end-of-course assessments counting as part of students' final grades; an overall score for accountability purposes; more measures for career readiness; adding a designation for schools/districts making progress within categories; and removing the "A-F" classifications for school/district overall scores.
- Principals Advisory Council (PrAC) – recommended awarding extra points for students

scoring at the highest levels; more measures for career readiness; and removal of the "A-F" designations for school performance.

- Local Superintendents Advisory Council (LSAC) – provided suggestions on weights for components of the accountability model; definition of "full academic year;" a tiered system of supports for rewards and consequences; and removal of the "A-F" designations for school performance.
- Kentucky Association of Assessment Coordinators (KAAC) – submitted recommendations on definition of "full academic year."
- Educational cooperatives – recommended removing the "A-F" classifications for school/district overall scores.
- Kentucky Association for Career and Technical Education (KACTE) -- presented several recommendations related to college/career readiness calculations, including criteria and bonus points if a student scores both college- and career-ready.
- Superintendents Advisory Council – suggested the addition of the "Progressing" category to the model for schools that meet their annual AYP/AMO goal and affected the proposal for locking the goal lines for five years and then resetting them in order to promote continuous improvement.
- Kentucky's Technical Advisory Committee (TAC), called the National Technical Advisory Panel on Assessment and Accountability (NTAPAA) – provided feedback on the Annual Measurable Objectives (AMO).

In November 2011, additional outreach efforts occurred that highlight the department's strategies to gather input from stakeholder groups focused on improving learning outcomes for students with disabilities. Kentucky Department of Education (KDE) staff presented to the State Advisory Panel for Exceptional Children (membership can be found at the following link: (http://education.ky.gov/specialed/excep/pages/state-advisory-panel-for-exceptional-children.aspx) and to staff of the state's Special Education Cooperatives. Both groups were able to (and continue to) provide feedback on the strategies KDE intends to employ related to closing achievement gaps and federal Office of Special Education Programs expectations. During this same timeframe, KDE staff presented several sessions at the state's Council for Exceptional Children's Conference related to the waiver request. Over 1,100 special educators, district and building level administrators, and parents attended this conference and were given opportunities to share input on the waiver request.

As a part of Kentucky's outreach efforts to parents, especially of students with disabilities, KDE has turned to the leadership of the Kentucky Special Parent Involvement Network (KY-SPIN) whose website can be found at http://www.kyspin.com. KY-SPIN, Inc. This network is funded by the U.S. Department of Education and provides statewide training, information and support to people with all types of disabilities, their parents and families, and professionals for all age groups. Kentucky's ESEA waiver flexibility proposal and webcasts hosted by Commissioner Terry Holliday have been posted on their website with a survey to capture feedback based on how well the waiver addresses the following considerations:

1. Improve outcomes for students with disabilities by ensuring that all students reach proficiency and graduate from high school ready for college and careers;
2. Recommend interventions for districts/schools to implement when working with students with disabilities;

3. Focus professional development for all educators on improving student learning outcomes, specifically for students with disabilities.

As this feedback is captured, KDE is committed to including this information as a part of the flexibility implementation process.

Similarly, all directors of English language learners across the state will be provided an opportunity to submit feedback and will have a survey targeting the learning needs and outcomes for English Language Learners. KDE has also partnered with the Kentucky Teachers of English to Speakers of Other Languages to post the waiver and solicit feedback. These key partnerships will present additional opportunities for KDE to engage all stakeholders in improving learning outcomes for ALL students.

The draft waiver request and the Appendix along with information on how to provide input and feedback was posted in the Unbridled Learning section of the Kentucky Department of Education's website on October 28, 2011. The availability of the documents for review was communicated via e-mail and news release to the State Committee of Practitioners, superintendents, local boards of education, principals, teachers, school staff, parents, legislators, education partners and the general public.

Documentation of the official notice of the waiver request and opportunity to comment on it to LEAs can be found in Attachment 1 on page 1 of the Appendix. Comments received from educators and others can be found in Attachment 2 on page 6 of the Appendix. Notice of the waiver request and the opportunity to comment for the public can be found in Attachment 3 on page 30 of the Appendix.

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.

Guidance Questions:

- ***Did the SEA provide an overview of the SEA's vision to increases the quality of instruction and improve student achievement?***
- ***Does the SEA's overview sufficiently explain the SEA's comprehensive approach to implementing the waivers and principles and describe the SEA's strategy for ensuring that this approach is coherent within and across the principles?***
- ***Does the SEA's overview describe 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?***

Kentucky's Comprehensive Reform Agenda: College and Career Readiness for ALL

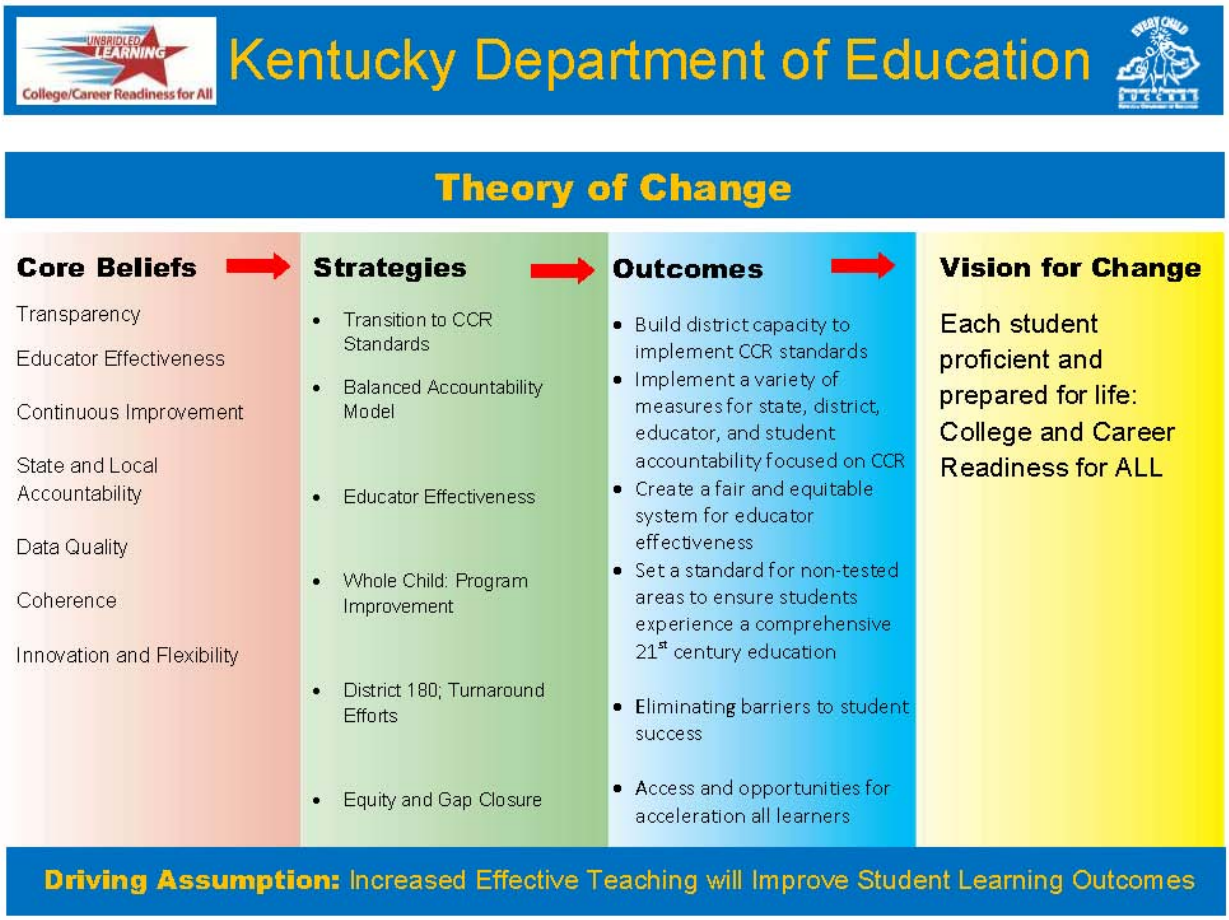
Currently, the Commonwealth has 50,000 children in 8th grade, and if nothing changes, only 17,000 of these children will graduate college- and career-ready from high school. In 2009, Governor Steve Beshear signed key legislation that significantly impacted education across the Commonwealth. This bi-partisan legislation known as Senate Bill 1 (SB1) called for an overhaul of many of the components in the state's previous reform efforts and established a unified focus on college and career readiness. Specifically, the legislation charged the Kentucky Board of Education (KBE) and Kentucky Department of Education (KDE), Council on Postsecondary Education (CPE) and Education Professional Standards Board (EPSB) to:

- reduce the state's college remediation rates of recent high school graduates by at least 50 percent by 2014 from the rates in 2010
- increase the college completion rates of students enrolled in one or more remedial college classes by 3 percent annually from 2009 to 2014

The **vision** of this legislation is directly aligned to the principles of the ESEA flexibility waiver request. Over the past two years, Kentucky has been implementing a comprehensive agenda to transform education across the state. Overall, Kentucky's reform is predicated on key values to ensure:

- **transparency**
- **educator effectiveness**
- **continuous improvement**
- **state and local accountability**
- **data quality**
- **coherence**
- **innovation and equity**

This agenda, now known as Unbridled Learning: College- and Career-Ready for All, is captured in the graphic below that outlines Kentucky's theory of change.



KDE's delivery and project management plans guide the KBE strategic plan to ensure successful implementation for improved learning outcomes. These plans specifically outline key milestones, activities, timelines, parties responsible, evidence for progress, goal trajectories, resources and potential obstacles. KBE's annual strategic planning process will allow the state an opportunity to evaluate and make adjustments according to the state's overall progress in meeting the goals aligned to the principles in this waiver. Specifically, this process will require all stakeholders to reflect on strategies to determine areas of improvement.

For information about deployment of KDE's Unbridled Learning Strategic Plan, see Attachment 16 on page 154 of the Appendix.
Unbridled Learning keeps the best of No Child Left Behind (NCLB) – the focus on closing achievement gaps and moving students to proficiency – but it also puts intense emphasis on college/career-ready goals, provides a more balanced approach and offers annual growth expectations at the student, classroom, grade, school, district and state levels, along with comparisons to national and international metrics.

The Unbridled Learning initiative addresses all three principles of the waiver request:

- Principle 1: College- and Career-Ready Expectations for All Students
- Principle 2: State-Developed Differentiated Recognition, Accountability and Support

- Principle 3: Supporting Effective Instruction and Leadership

ESEA Flexibility and Waiver Request/Support

The ESEA flexibility waiver request offers states an important opportunity to leverage bold shifts in policy, practice and accountability. The flexibility in implementing Kentucky's plan is woven throughout this request in order to present a coherent approach to implementing the waiver principles.

Kentucky has surveyed various stakeholder groups, and the most critical aspect of the waiver relevant to them is the ability to participate in a **single, statewide accountability model**. Kentucky's statewide accountability system is established to make **annual determinations** based on a balance of components – college- and career-ready students; teacher and leader effectiveness based on learning outcomes; and an evaluation of instructional programs that support the learning of the whole child (non-tested areas). Transitioning to the Common Core Standards presented the impetus for the design and implementation of a new model. This model moves beyond many tenets of No Child Left Behind, but maintains a focus on proficiency, increasing the quality of instruction and improved outcomes for diverse populations. Each component of the accountability model is further explained in section 2A.

Kentucky's model uses data from achievement, gap closing, individual student growth, college/career readiness, graduation rates, Program reviews and teacher/leader evaluations to provide a broad view of teacher and leader effectiveness and to create an incentive to work on whole school reform. College and career readiness for all students is the primary goal; however, addressing individual gap groups through various methods, including a student gap group score for each school that prevents masking of achievements gaps and annual targets for subgroups through delivery plans that will be publically reported. This data will also be included in district and school report cards. The model is quite innovative and assists in communicating expectations for all learners moving toward college and career readiness goals. This shift captures the attention of more Kentucky schools by advancing a focus on equity and the continuous improvement for the performance of diverse populations. In the former federal and state accountability models, districts/schools had competing goals. If this waiver is approved, Kentucky's new model will unify goals and expectations for the state's 174 districts and more than 1,200 schools.

Establishing a model based on results but driven by a process of continuous improvement will allow variation in the support and interventions implemented by KDE's Office of District 180. The waiver will guarantee flexibility in the use of federal funds to strengthen the support across a portfolio of schools, including Reward, Priority and Focus Schools. Deeper diagnostic reviews of the state's most struggling districts/schools will ensure interventions are targeted and that assistance is coordinated to yield high results in local turnaround efforts. Leveraging the flexibility in this waiver request will present greater opportunities for interventions related to use of time, staffing and other resources to improve student learning outcomes, especially for those who have traditionally underperformed. KDE will be able to make informed data-driven decisions, monitor and track improvement, and build district/school capacity through the opportunities for flexibility in this waiver.

However, improved student learning outcomes are based on making sure each child is taught by an effective teacher and that all teachers have the support of effective leaders. This waiver request calls for strategies that will dramatically improve education outcomes for all learners. The variable that has the greatest impact on student learning outcomes is the teacher; therefore, ensuring that each child is taught by an effective teacher is critical to Kentucky's college- and career-readiness agenda. Better student learning outcomes are dependent upon having more effective teachers determined by multiple measures within a fair and equitable evaluation system. Additionally, teachers need to be supported by effective leaders within local systems in order to guarantee all children reach college- and career-ready goals.

KDE, in partnership with various stakeholder groups (as referenced in section 3A), has worked in a deliberate fashion over the past two years to develop a professional growth and evaluation system. The thinking underlying the design of this system abandons a traditional approach to teacher and principal evaluations and creates a new paradigm that is robust and includes multiple measures for determining effectiveness.

Specifically, Kentucky's design will present guidelines to focus on gathering data from rigorous classroom observations, student and parent feedback, a working conditions survey (Teaching, Empowering, Leading, and Learning Kentucky – TELL Kentucky), and pedagogical and content knowledge data from educators. While the nation embarks on a serious transition to new professional growth and evaluation systems, Kentucky is moving slowly and deliberately, to garner the support necessary to make these fundamental shifts. The inclusion of higher education, community and business stakeholders, Kentucky's local teachers' unions and statewide teachers' association, and district and school leaders has been crucial to successfully moving forward. The journey and results to date are aligned to Principle 3 of this waiver request. The waiver will allow the state to leverage the types of shifts that need to occur to create incentives for districts and schools to engage leaders in a process of re-evaluating how systems recruit, distribute and retain effective teachers and leaders.

The plan outlined above presents a reform agenda based upon the state's courage to implement innovative options to ensure all students are college- and career-ready; commitment to flexibility and accountability for continuous improvement; and capacity to lead the nation in bold strategies for the state's next generation of a reform agenda. A new reform agenda must occur to bring back economic prosperity within the Commonwealth and begins with the bold initiative of Unbridled Learning: College- and Career-Ready for All.

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

1A ADOPT COLLEGE-AND CAREER-READY STANDARDS

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

Option A	Option B
☒ 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. i. Attach evidence that the State has adopted the standards, consistent with the State's standards adoption process. **(Attachment 4) See Appendix, page 35.** Kentucky also has an MOU signed by presidents of all Kentucky colleges and universities and a State regulation 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 and has included these as **Attachment 5, page 36 of the Appendix**.	☐ 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. **i.** Attach evidence that the State has adopted the standards, consistent with the State's standards adoption process. 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.

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.

Guidance Questions:

- ***Is the SEA's plan to transition to and implement college- and career-ready standards statewide in at least reading/language arts and mathematics no later than the 2013-2014 school year realistic, of high quality, and 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?***
- ***Does the SEA plan to evaluate its current assessments and increase the rigor of those assessments and their alignment with the State's college- and career-ready standards, in order to better prepare students and teachers for the new assessments through one or***

more of the listed strategies?

Overview of Transition to College- and Career-Ready Standards

State legislation, known as Senate Bill 1 (2009), served as the catalyst for Kentucky's shift to college- and career-ready standards and assessments. In February 2010, Kentucky became the first state to adopt the Common Core Standards (CCS). The state's role in transitioning to the CCS has been pivotal to implementing a new reform agenda in the state. The systemic approach to transitioning and implementation began with a focus on building district/school capacity through a system of Leadership Networks. Standards alone cannot change instructional practices; therefore, in the past year, the Kentucky Department of Education (KDE) has focused on identifying strategies to ensure course and assessment alignment with the CCS. KDE's College and Career Readiness Delivery Plan provides an example of the state's efforts to scale acceleration strategies (e.g., Advanced Placement and Dual Credit options) and providing targeted interventions (e.g., Senior Year Transitional Courses and Early College designs) to ensure more students graduate college- and career-ready.

The video *All Eyes on Kentucky***,** produced by the School Improvement Network, presents the case for why Kentucky is fully committed to transitioning to the Common Core Standards and can be accessed at http://www.youtube.com/watch?v=VW0ZMamnQV4.

Kentucky's new assessment system is based on a coherent, rigorous system of assessments aligned with college and career standards. The ***new assessment system, which will begin in the 2011-12 school year, uses the ACT as the capstone high school assessment to determine college and career readiness.*** The new testing system is linked from Grade 3 to Grade 12 and locked onto college readiness standards. Students taking the tests from Grade 3 to 12 will know if they are on the path toward college and career readiness as defined by all of the public universities in Kentucky.

Detailed Narrative on Transitioning to College- and Career-Ready Standards

As the first state to fully adopt the Common Core Standards (CCS) in English/language arts and mathematics, Kentucky took a significant step forward in solidifying a focus on ensuring all children are college- and career-ready and prepared for life. The attached resolution, "Resolution Supporting the Adoption and Integration of the Kentucky Core Academic Standards Across Kentucky's Education System By the Kentucky Board of Education, Council on Postsecondary Education and the Education Professional Standards Board Commonwealth of Kentucky" (Attachment 4 on page 35 of the Appendix), represents the culminating event and public commitment, on behalf of three state-level boards, to implement the CCS and shape the next generation of teaching and learning focused and aligned to the national emphasis on ensuring more students graduate college- and career-ready. The state regulation that put the CCS into law, 704 KAR 3:303, Required core academic standards, was initially adopted by the Kentucky Board of Education in February 2010 and can be found at http://www.lrc.ky.gov/kar/704/003/303.htm. Incorporated by reference within the regulation are the actual CCS for English/language arts found at http://education.ky.gov/curriculum/docs/Documents/KentuckyCommonCore_ELA.pdf and the

standards for mathematics found at http://education.ky.gov/curriculum/docs/Documents/Kentucky%20Common%20Core%20MATHEMATICS.pdf.

The implementation of the Common Core Standards presents an opportunity for Kentucky educators to prepare students with content that is more focused and coherent and demands a deeper level of learning. The greatest potential in transforming education in the Commonwealth is present in the CCS and has shifted teachers' expectations and instructional approaches to teaching and learning. These standards outline the specific expectations for P-12 but also bring about agreement with postsecondary, creating a seamless approach to learning P-20.

Kentucky's College and Career Readiness Delivery Plan (Attachment 17 on page 163 of the Appendix) was created in collaboration with higher education and specifies the strategies for increasing the number of students that are college- and career-ready. The Kentucky Department of Education and Council on Postsecondary Education (CPE) have articulated a strong emphasis on increasing the innovative pathways for students as options for acceleration and intervention supports. This also includes a focus on expanding Advanced Placement and dual credit opportunities with increased rigor and STEM (science, technology, engineering and mathematics) coursework aligned to college- and career-ready expectations.

Kentucky's approach to developing a comprehensive and unified plan for college and career readiness and the transition and implementation of the CCS was started by a challenge Commissioner of Education Terry Holliday made to each school district to sign a Commonwealth Commitment to reaching goals of more students graduating college- and career-ready, as explained on page 12 of this waiver request.

Putting this commitment into operation meant the Kentucky Department of Education would need to play a new and different role in providing support to district leadership teams. Kentucky's model is one that mirrored the process used by the Council of Chief State School Officers (CCSSO) and National Governors' Association (NGA). These organizations modeled a strategy that brought state leaders and key stakeholders together to own their roles and define their responsibilities in contributing to a new model for implementation of standards. Kentucky replicated this process through a partnership with higher education, businesses, parent and professional organizations, and the P-12 community. **The theory of action driving this model for implementation is based on the need to have highly effective teachers facilitating learning for every student in every classroom across the Commonwealth.** Deep learning, guiding the implementation of the new standards for Kentucky educators, is based on building capacity at the local level. Standards alone will not lead to college- and career-ready students, but the implementation of the standards and interactions among the student, teacher and content will lead to students being better prepared for the future. Kentucky's three-year action plan for transition and implementation of the CCS, found as Attachment 18 on page 200 of the Appendix, began in August 2010. The capacity-building model has a regional focus and includes higher education faculty from the arts and sciences and colleges of education, district- and building-level leaders, and most importantly, teacher leaders. This systemic approach, through regional Leadership Networks, was designed to meet

the needs of educators to ensure success in the implementation of CCS; in developing an understanding of assessment literacy set in the context of highly effective teaching and learning, and leadership. A month-by-month curriculum for the 2010-11 and 2011-12 school years for the Leadership Networks component may be found as Attachment 19 on page 201 of the Appendix. In Year 1 (2010-11 school year), this curriculum plan highlights the department's effort to assist educators in the alignment and expectations of the CCS by creating common understandings about the intended learning for the rigor found in the new standards. This critical piece in transition has enabled Kentucky educators to make the necessary shifts in practice in order to support all students in reaching college and career readiness expectations.

Within the first month of adoption, KDE staff provided a crosswalk to districts/schools in order to present the differences in Kentucky's former standards and the newly adopted Common Core Standards. Almost immediately following the release of the crosswalk, KDE leadership, content specialists and network facilitators led district/school and content teacher leaders through a gap analysis protocol. During the network meetings, several activities were implemented, but as a follow-up, KDE content specialists visited districts/schools to provide district leadership teams with the necessary supports to lead this process using the KDE protocol at the local level. The protocol and resources developed to support district/school teams through this process can be found at: http://education.ky.gov/school/pages/leadership-networks---deliverables.aspx and http://education.ky.gov/curriculum/docs/pages/kentucky-core-academic-standards---new.aspx.

Year 2 (2011-12 school year) has afforded teacher and building-level leaders with the opportunity to design congruent learning experiences for students. While teacher leaders focus on design, building and district leaders and principals are engaged in conversations about the "classroom look-fors" for effective implementation in the classroom contexts. Educators are committed to the development and sharing of high-quality instructional resources that present learning opportunities for students. Building-level principals are essential in this change process, and KDE has incorporated key facets of the teacher and leader effectiveness system into the Leadership Network curriculum. Year 2 is designed to integrate the components of the effectiveness system, effective strategies for implementing the standards and effective use of data (i.e., student growth data and working conditions data from the TELL Kentucky Survey that is given to all teachers and principals).

In order to meet the expectation of full implementation and assessment of the new standards, the state legislature has committed financial resources and the state has received foundation funding for the support and implementation of the standards. State and federal funding have been redirected for the transition and implementation of the standards in order to address the needs of all learners. Two examples below outline the state's comprehensive efforts in working with educators on behalf of English language learners and students with disabilities. Kentucky has been engaged in an alignment process to analyze the linguistic demands of the CCS for English language learners (ELLs). In November 2010, the World-Class Instructional Design and Assessment (WIDA) provided member states the results of an alignment study that examined the relationship between the CCS and the Model Performance Indicators (MPIs) of the WIDA ELP standards. An analysis was presented in a published report, *Alignment Study*

between CCSS in English Language Arts and Mathematics and the WIDA ELP standards, 2007 edition. As a member state since 2006, Kentucky has been involved in these conversations but also in a process to provide additional feedback on a standards amplification project to review and provide feedback on a draft version of the *English Language Development (ELD) Standards Document* (targeted publication -- 2012).

Involvement in this analysis process has allowed Kentucky to present the most up-to-date information and create a focused effort on providing professional development to all educators, but specifically to ELL educators. An online English Learner Academy (ELA) was implemented during the 2010-11 school year. This online, professional learning community engaged P-12 educators in learning experiences to advance their understanding and application of recommended instructional and assessment practices for ELLs. Various aspects of the curriculum addressed the following:

- effective ways to include English Language Development (ELD) and CCS in daily lesson planning and units of study
- best practice strategies for ELLs to implement in mainstream classes to support learning
- how ELLs can best be served within Kentucky's System for Interventions (KSI/RtI)
- how to incorporate the WIDA ELD standards, descriptors and ACCESS (Assessing Comprehension and Communication in English State-to-State for English Language Learners) for test data in evaluating ELLs

Additionally, Title III program funding has included a professional development plan on implementation of the CCS while learning how to differentiate academic language during content instruction to enhance students' understanding and engagement. The following webinars have been scheduled throughout the 2011-12 school year to assist Kentucky teachers:

- Implementing the CCSS in Your School
- Using Data to Drive Instruction for ELLs
- Implementing Differentiated Instruction in Your School
- Program Services Plans for ELLs

While the previous professional development opportunities present on-line learning options, the Kentucky Department of Education has committed to face-to-face trainings for P-12 educators through the support of the Kentucky Writing Projects (KWP). The KWP network is collaborating with ELL educators to host an academy. A description of the project is outlined below.

Kentucky Writing Project ELL Proposal
Kentucky will enter into a MOA with the University of Louisville to further support Kentucky's growing ELL population.

Teachers need to improve their abilities to support ELLs in literacy learning, both because of the growing ELL population and because of the expectations in the new Common Core Standards, adopted as the Kentucky Core Academic Standards. Professional networks such as the Kentucky Writing Project, which exists to develop teacher knowledge and leadership in the field of literacy (reading and writing), need to increase their capacity to provide professional

training that supports teachers of ELLs, whether or not they are in special programs or in the regular classroom. In light of these needs, the Kentucky Writing Project Network applied as a state network to send a team to the National Writing Project's "Focus on English Language Learners" Institute in July 2011, with the purpose of building capacity in the individual writing project sites and statewide in providing professional development. Representatives from most of the eight member sites attended this five-day summer training and planning session and committed to a year of inquiry and application of new ideas learned at the institute to their own classroom contexts.

Kentucky will provide four one-week Academies (one each in the eastern, western, northern and central regions of the state) that will engage teachers of ELLs and/or Culturally and Linguistically Diverse (CLD) students in learning strong ways to support these students' literacy development, whether or not they are in special programs or being taught by ELL or general education teachers. Facilitators will share strategies learned in their year of inquiry and practiced in their own school settings. A special focus will be on implementing the new Common Core Standards (Kentucky Core Academic Standards) and finding ways to support ELLs/CLDs in meeting those standards.

Other partners in the work: The KWP FoELL/CLD team has the continued support of the National Writing Project, which provides an online community and access to a wealth of ELL resources. KDE also has a state team that is working with the Gates Foundation to develop professional development around the new Common Core Standards, as well as through the Literacy Design Collaborative template tasks for integrating reading and writing instruction. Furthermore, several KWP sites have close connections with university ESL departments and university educators who will collaborate with the team to ensure that the best practices and research about ELL needs undergird the planning and implementation of the academies.

Over the past two years, educators working with students with disabilities have been formally engaged throughout the state's transition and implementation process. Special educators have participated in the state's Leadership Networks. Each district was strongly encouraged to send at least one special education teacher to the Leadership Networks, and all district special education directors have been encouraged to participate in the district leaders' network. This model has encouraged district leadership teams to intentionally include special educators at the forefront of professional development planning for special educators in their districts. Additionally, the state's 11 regionally located special education cooperatives have received additional funding for the purpose of providing more intensive training on the CCS. Literacy and math specialists, who have special education expertise, have been hired through these cooperatives to be the "boots on the ground" in classrooms to support teachers working with students with disabilities. These efforts are likely to lead to all students, including students with disabilities, gaining greater access to and opportunity to learn the content presented in the CCS. An action plan for the literacy specialists working in the special education cooperatives is included as Attachment 27 on page 302 of the Appendix. This plan highlights the specific strategies the Kentucky Department of Education (KDE) has implemented over the past year through professional development specifically targeting educators who work with students with disabilities, ELLs and other students considered at-risk. Strategies include:

- incorporating Universal Design for Learning practices

- Response to Intervention support
- emphasis on curriculum development and design through the state's model curriculum framework
- assessment literacy strategies and accommodations for students with disabilities and ELLs

The state has analyzed the learning and accommodation factors necessary to ensure students with disabilities are successful in a pursuit of college and career readiness. This focus has been a primary component of the federal Individuals with Disabilities Education Act (IDEA) and has been realized by bringing together cross-agency teams and stakeholder committees to discuss proposed revisions to the existing state regulation governing accommodations in statewide assessment and accountability (703 KAR 5:070). These revisions will present different opportunities within the classroom and testing environment so that students can demonstrate content mastery.

Over the past year, in preparation for the Alternate K-PREP (formerly Kentucky Alternate Assessment Program) Standards rolled-out recently to teachers across the state, KDE has worked with the state's Special Education Cooperatives and institutions of higher education to produce instructional and curriculum supports for the new reading, writing, and math standards. These materials are all based on the Common Core State Standards. The materials include: podcasts, training materials and instructional tools to assist teachers as they implement the new common core standards with students with disabilities.

KDE's goal for development of training and supports for teachers of students who participate in the Alternate K-PREP was to mirror the curriculum planning process used in the general curriculum as much as possible. Also, this work is aligned to the general educator peers' professional development focused on improving instructional practices through the characteristics of highly effective teaching and learning (CHETL). Additional materials appear on the KDE website's Low Incidence page at: http://education.ky.gov/specialed/excep/pages/low-incidence.aspx.

Dissemination of high-quality resources, in a predominately rural state, presents a challenge. Kentucky has implemented four broad-scale strategies for transition and dissemination of the CCS and college- and career-ready strategies. First, Kentucky's *Model Curriculum Framework* (MCF) is designed to be a resource to facilitate curriculum development focused on the implementation of the CCS and new assessments at the local level. The framework may be found at the following link: http://education.ky.gov/curriculum/docs/Documents/Kentucky%20Model%20Curriculum%20Framework%202011%20revised%20July%2026.pdf.

Second, a multi-phased project is underway that will present an online technology platform. This system, known as Kentucky's Continuous Instructional Improvement Technology System (CIITS), presents anytime, anywhere access to high-quality resources and professional development and serves as the model for dissemination of exemplar lessons, strategies and instructional materials. A focus on equity and access to these resources has been a focus for

KDE. Kentucky educators' access will include access to all standards, instructional resources aligned to the CCS, formative assessments and professional development. CIITS implementation began in August 2011, and the system will be fully populated by December 2012. An educator development suite will provide a customized experience for identifying professional development tied to student learning outcomes and will include just-in-time video podcasts of higher education faculty prepared to elaborate on strategies for teaching CCS content. Additionally, resources are available in this CIITS suite, as a result of Kentucky's partnership with the School Improvement Network. PD 360 resources scheduled to be integrated into the educator development suite have an intentional focus of providing support to P-12 educators working with students with disabilities, ELLs, and other diverse populations. The PD360 learning options are included as Attachment 28 on page 307 of the Appendix. This suite will also be tied to Kentucky's professional growth and evaluation system once it is developed. This integrated model will tie educator effectiveness to student learning outcomes in a deliberate way. Finally, the system will be connected to district and school planning in order to complete the cycle for continuous improvement.

Third, the inclusion and partnership of institutions of higher education represents another unique contribution Kentucky has made to the national conversations dedicated to a college- and career-ready agenda for all. The Council on Postsecondary Education (CPE), the governing body of the state's institutions of higher education, has committed a significant amount of funding to the implementation of the CCS and college- and career-ready assessments. These state-level partnerships with higher education have served as a model for implementation.

In February 2012, Kentucky will host a national convening, on behalf of the State Higher Education Executive Officers (SHEEO), to share the collaborative efforts between the state agency and higher education to improve learning results for students P-20. During this workshop, participants will learn about the efforts to increase faculty involvement in university/district partnerships for implementing the CCS. Assessment centers, housed on the college and university campuses, have assisted P-12 in the development and alignment of assessments by helping educators in the design of formative assessment strategies ensuring that students meet agreed-upon college-ready benchmarks for placement.

Fourth, KDE coordinates messaging to key stakeholders such as community partners, business and community partners, and parents/guardians by working closely with Kentucky Educational Television (KET) and with advocacy groups. KET has developed online, self-paced learning modules for parents, teachers and other groups outlining the need and significance of the adoption of new standards. And, the Prichard Committee has the ReadyKY campaign (http://www.prichardcommittee.org/readykentucky/) designed to involve parents and community members and deepen their understanding of the implementation of the CCS and a new assessment and accountability model. ReadyKY has created a cadre of public advocates who are spokespersons in community contexts.

Additionally, understanding the impact the CCS have on education, the state has worked diligently to penetrate pre-service and in-service programs as well as certification. Kentucky's Education Professional Standards Board (EPSB), the agency responsible for teacher

certification, also has been instrumental in the systemic transformation in education. Since 2005, the EPSB has collaborated with school districts and KDE staff and has approved Kentucky principal preparation programs to redesign principal preparation through state regulation 16 KAR 3:050. This redesign took into consideration support to programs through professional development efforts as part of the transition. Believing that the old programs were too ineffective to improve through programmatic adjustments, the EPSB took regulatory action, and all old principal preparation programs will sunset on December 31, 2011.

Similar work is underway for the redesign of the teacher preparation programs. The changes have required universities to develop clinical approaches for experienced educators offering the practical application of what is taught in classrooms. In December 2010, all existing master's degree programs were closed by EPSB, making room for approximately 12 Teacher Leader Master's programs. Additionally, the EPSB is developing a Program Quality Performance Rating as a continuous improvement mechanism for teacher and principal preparation programs. The goal is use of student performance data and outcomes from the state's teacher and principal effectiveness system as two measures within the Program Quality Performance Rating. This action taken by the EPSB ensures a commitment to systemic change to impact pre-and in-service programming.

Key Questions and Answers

1. Why transition to the Common Core Standards?

The Common Core Standards present a consistent, clear understanding of what students should know and be able to do and represent the expectations of the necessary skills and knowledge to ensure students are college- and career-ready. In Kentucky, Senate Bill 1 (2009) required a revision to all content standards, and the state wanted to engage in this development work. The Common Core Standards initiative has allowed states to share expectations related to college and career readiness and getting all students to higher levels of proficiency.

Detailed Narrative on Increasing the Rigor of Assessments and Alignment to College- and Career-Ready Standards

At the same time that the work on the college and career standards was occurring, work on the assessment system began with the goal of increasing rigor and alignment to college and career standards. The changes in the assessment system began with the passage of Kentucky Senate Bill 1 in 2009. Senate Bill 1 was a sweeping, omnibus law that called for a new testing system in Kentucky aligned to new standards. The new state testing system is focused on measuring college and career readiness from Grade 3 to Grade 12 and uses the ACT test as the capstone assessment to determine college readiness. It is important to note that the Kentucky testing system is codified in state regulations and has been launched in the 2011-12 school year. Kentucky, starting this year, has a new college and career standards testing system.

The Council on Postsecondary Education (CPE) led the effort to define college readiness in Kentucky. In fact, the CPE revised state regulation 13 KAR 2:020, Guidelines for admission to the state-supported postsecondary education institutions in Kentucky, to define college

readiness and set the benchmark for admitting students to credit-bearing courses without having to take remedial courses. Additionally, the presidents of all higher education public institutions in Kentucky signed a Memorandum of Understanding (MOU; agreement) to accept this same definition of college readiness. See Attachment 5 on page 36 of the Appendix for both the MOU and 13 KAR 2:020. The definition calls for a student to meet a CPE benchmark on the ACT test. By meeting the CPE benchmark, all public higher education institutions will admit that student to a credit-bearing course. In essence, Kentucky's higher education institutions set the definition and the benchmarks for college and career readiness. In turn, public P-12 schools have a clear definition to use as their guiding principle for instruction and curriculum. This remarkable, unprecedented agreement allows KDE to align the grades 3-12 testing system with a capstone college readiness definition driven by our partners in higher education.

The new testing system is linked from Grade 3 to Grade 12 and locked onto college readiness standards. Students taking the tests from Grade 3 to 12 will know if they are on the path toward college and career readiness. Kentucky's new testing system is explained in the narrative below.

<u>High School Testing Model</u>

ACT

The ACT is the capstone test in the new Kentucky system and is administered annually to Kentucky high school juniors in the spring. ACT is based on more than 50 years of research and provides a measure that shows the probability of student success in the first year of college. ACT has clearly defined standards and benchmarks for the subjects of reading, English and mathematics. ACT was an important player in the development of the Common Core Standards, and the ACT standards and tests are highly aligned with the Common Core work. Students who make the benchmarks are deemed ready for college courses. Students who do not meet the college benchmarks receive intervention and assistance to increase their readiness levels. Students may either take the ACT again or participate in one of two supplemental tests: the ACT COMPASS or the Kentucky Online Testing Program (KYOTE). COMPASS is a computer-based adaptive test that provides a score linked to the ACT scale. KYOTE was developed by the University of Kentucky, Northern Kentucky University and Eastern Kentucky University as a secondary measure of college readiness. CPE also obtained universal agreement from all Kentucky public institutions of higher learning to allow the COMPASS or KYOTE to be used as a supplement to the ACT score. CPE set the benchmarks for these two tests. (See Attachment 5, page 5 of the Appendix, for the Commonwealth Commitment Resolution Supporting the Role of Postsecondary Education in Improving College and Career Readiness that was signed by Kentucky's college and university presidents and for state regulation 13:KAR 2:020, Guidelines for admission to the state-supported postsecondary education institutions in Kentucky, that was passed by the Council on Postsecondary Education in June 2011 setting the requirements for students to be admitted to Kentucky higher education institutions without having to take remedial courses.)

ACT, INC. PLAN

In addition to the ACT, all sophomores in Kentucky take the ACT, Inc. PLAN test. The PLAN test is statistically linked to the ACT and provides an early prediction of how well a student will perform on the ACT test, as well as providing objective strengths and weaknesses to a student. This early warning test can be used to locate students in the fall of the sophomore year who need additional interventions.

ACT, INC. QUALITY CORE END-OF-COURSE TESTS

Kentucky has embarked on an ambitious end-of-course testing program. The ACT Quality Core® tests in English II, Algebra II, Biology and U.S. History were administered in 2011-12 to all high school students completing these courses. In Kentucky, all students must have these courses on their transcripts in order to earn a diploma. The ACT Quality Core® testing program is a comprehensive curriculum-based test measuring standards with a high match to the Common Core Standards. The ACT test scores also can be used optionally as a part of the student's final grade, thus providing high motivation to do well in the course. But more importantly, the test scores are linked to predicting how a student will perform on the ACT or PLAN test. The predicted scores create highly rigorous, college-based expectations for high school teachers and students in Kentucky.

The Kentucky testing program at the high school level has an unbroken chain of links between the ACT capstone test and the ACT PLAN and ACT Quality Core® tests. The ACT PLAN predicts an ACT score; the ACT Quality Core® predicts an ACT score. These links between courses and tests provide Kentucky high schools, for the first time, with a common set of definitions and standards for aligning instruction to a rigorous model of college readiness. And, for the first time, public higher education institutions have defined the standards required for their incoming students to be admitted to credit-bearing courses without having to take remedial coursework.

In addition to the Quality Core® tests, high schools students will take an end-of-year writing-on-demand test, developed by Kentucky's testing contractor.

<u>The Middle School Testing Program</u>

The middle school testing program has a link to the high school tests. Each test is explained in the next sections:

ACT, INC. EXPLORE

All Kentucky public school students in grade 8 take the ACT EXPLORE test annually in September. This test, based on a set of curriculum standards with high correlation to the Common Core Standards, provides a predicted score on the ACT PLAN test. The ACT EXPLORE measures achievement in reading, English, mathematics and science. Eighth-grade students are being held to the same rigorous definition of college and career benchmarks that will apply to them as high school students.

KENTUCKY PERFORMANCE RATING FOR EDUCATIONAL PROGRESS (K-PREP) TESTS

In addition, the newly developed Kentucky Performance Rating for Educational Excellence (K-PREP) tests will be administered to all 6th-8th graders. K-PREP tests cover the subjects of reading, mathematics, science, social studies and writing. The tests are based on the Common Core Standards in reading, mathematics and writing; in science and social studies, the test is based on the *Kentucky Core Content for Assessment*. As soon as the new Common Core science and social studies standards become available through national work, tests will be created to measure those standards.

The K-PREP tests are designed to have a norm-referenced (NRT) and a criterion-referenced (CRT) component and include multiple-choice and constructed-response questions. The NRT will provide an achievement score based on a national sample of students, while the CRT will provide more detailed information on how students perform on the Common Core Standards. Pearson Inc. is the vendor for the K-PREP tests, but WestEd, Inc. wrote the set of Common Core items for the first operational test.

Elementary School Testing Program

The elementary schools in Kentucky also will use the K-PREP test format mentioned above. Grades 3-5 will participate in the tests. Similar to the middle school tests, the subjects are reading, mathematics, science, social studies and writing, and the tests have the same NRT/CRT format. The tests will measure the Common Core Standards.

Other Subjects Tested

As mentioned above, Kentucky also will test science, social studies and writing. Science and social studies tests are being developed using *Kentucky's Core Content for Assessment* (2006), and writing tests are being developed using the Common Core Standards. The standards and items measuring the standards were approved under prior United States Department of Education peer review guidance. Kentucky is a lead state in the development of the next generation science standards and as soon as the new standards for science and social studies are produced by either national- or state-led efforts, Kentucky will adopt those standards and then develop tests to measure the new standards.

Career-Ready Definition

In addition to the college-ready definition applicable to all students mentioned in the sections above, Kentucky has designed a career-readiness definition for high school students. Kentucky recognizes that some students may follow a career readiness path that does not include college; however, Kentucky also recognizes that many jobs in the workforce call for strong technical and academic skills. The career-ready definition calls for a student to meet qualifications in the two areas of Academic Skills and Technical Skills. Academic skills are measured by meeting a benchmark on either the ACT WorkKeys test or the Armed Services Vocational Aptitude Battery (ASVAB) test. Cut scores have been set at a high standard that would indicate the

student has a solid academic background. Technical skills are measured by passing a Kentucky Occupational Skills Standards Assessment (KOSSA) test or by obtaining an Industry Certificate. To demonstrate career readiness, a student must meet both the academic skills and the technical skills components.

Standard Setting and College and Career Rigor

In the college-readiness definition, standard-setting for the new K-PREP tests to determine the proficiency cut scores will be conducted in the summer and fall of 2012. Pearson will conduct the sessions with a traditional, industry-accepted model. In addition, it is the intent of KDE to link the K-PREP cut scores to the ACT EXPLORE profile, thus putting the K-PREP scores from grades 3-8 onto a scale that provides a prediction of how well a student would score on the ACT EXPLORE test. As mentioned above, the ACT EXPLORE predicts a college readiness score on the ACT PLAN that in turn predicts how well a student will perform on the ACT test.

Another piece of important impact data to be used during standard-setting is the National Assessment of Educational Progress (NAEP) profiles. The intent of the standard-setting is to provide Kentucky with a system of tests from Grade 3 to Grade 12 that are aligned with the rigorous definition set by the ACT college-readiness standards. The assessment system back-maps from the ACT college and career definitions to every test in the system. Students from grades 3 to 12 will know each year whether they are on track for college readiness.

In the career readiness definition, the standards were intentionally set at a high level to make sure students who choose this path are not receiving a less rigorous curriculum or preparation. For the ACT WorkKeys, the Silver Level was chosen, which means the student scores high enough academically in reading and math to be ready for 75 percent of all jobs profiled in the system. The ASVAB cut score was developed along the same method. The ASVAB's Armed Forces Qualifying Test (AFQT) score of 55 indicates the student is ready for a very high percentage of high-tech jobs in the military. Industry Certificates are only used in the definition if the job earns a living wage for a family. The first simulation data runs for applying this model found that a very high number of students who met the career-ready definition also met the college-ready definition.

Key Questions and Answers

1. *Will the new assessment system redefine proficiency in Kentucky?*

Yes. By using the college and career standards inherent in the Common Core and the benchmarks determined by Kentucky's Council on Postsecondary Education (CPE), an expectation exists that the distribution of students scoring at the proficient and distinguished level will drop. Approximately 38 percent of the students in the 2011 graduating class were determined to be college- and career-ready using the new definitions. When the assessment system is aligned with the college- and career-ready scale, it is estimated that the number of proficient students at the elementary and middle schools will fall into the range of 30-40 percent proficient or higher compared to the current 70 percent proficiency in reading in the

elementary level.

2. *Will the career-readiness definition be revisited?*
Yes. The Kentucky Board of Education will revisit the definition of career readiness. The board and the Kentucky Department of Education recognize that career-readiness definitions will evolve over the next few years, and we will need to be responsive to work in this area at the federal level and in other states.

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.

Option A	**Option B**	**Option C**
☒ The SEA is participating in one of the two State consortia that received a grant under the Race to the Top Assessment competition. **i.** Attach the State's Memorandum of Understanding (MOU) under that competition. **(Attachment 26 on page 274 of the Appendix); Note: Kentucky is a "participating state" in both the Partnership For Assessment of Readiness for College and Careers (PARCC) and Smarter Balance consortiums. The state is very interested in the work of these consortiums and once the actual tests are available, will analyze whether either of the instruments will meet the assessment requirements of Kentucky state law (Senate Bill 1, 2009).**	☐ 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. 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 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.	☒ 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. 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 review. **(Attachment 7 on page 74 of the Appendix)**

Guidance Question: If the SEA has developed and begun annually administering high-quality assessments in all LEAs, and has set academic achievement standards, did the SEA attach evidence that the SEA has submitted a timeline showing when the SEA will submit the assessments to the Department for peer review?

Kentucky chooses Option C. For Option C, item i., see Attachment 7 on page 74 of the Appendix for the timeline of when Kentucky will submit the assessments and academic achievement standards to the U.S. Department of Education for peer review.

However, Kentucky also checked Option A because the state is a **"participating state"** in both the Partnership For Assessment of Readiness for College and Careers (PARCC) and Smarter Balance consortiums. The state is very interested in the work of these consortiums, and once the actual tests are available, will analyze whether either of the instruments will meet the assessment requirements of Kentucky state law (Senate Bill 1, 2009). The state's MOUs with the consortiums are found in Attachment 26 on page 274 of the Appendix.

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.

Guidance Question: Did the SEA propose a differentiated recognition, accountability, and support system, and a high-quality plan to implement this system no later than the 2012-2013 school year, that is likely to improve student achievement and school performance, close achievement gaps, and increase the quality of instruction for students?

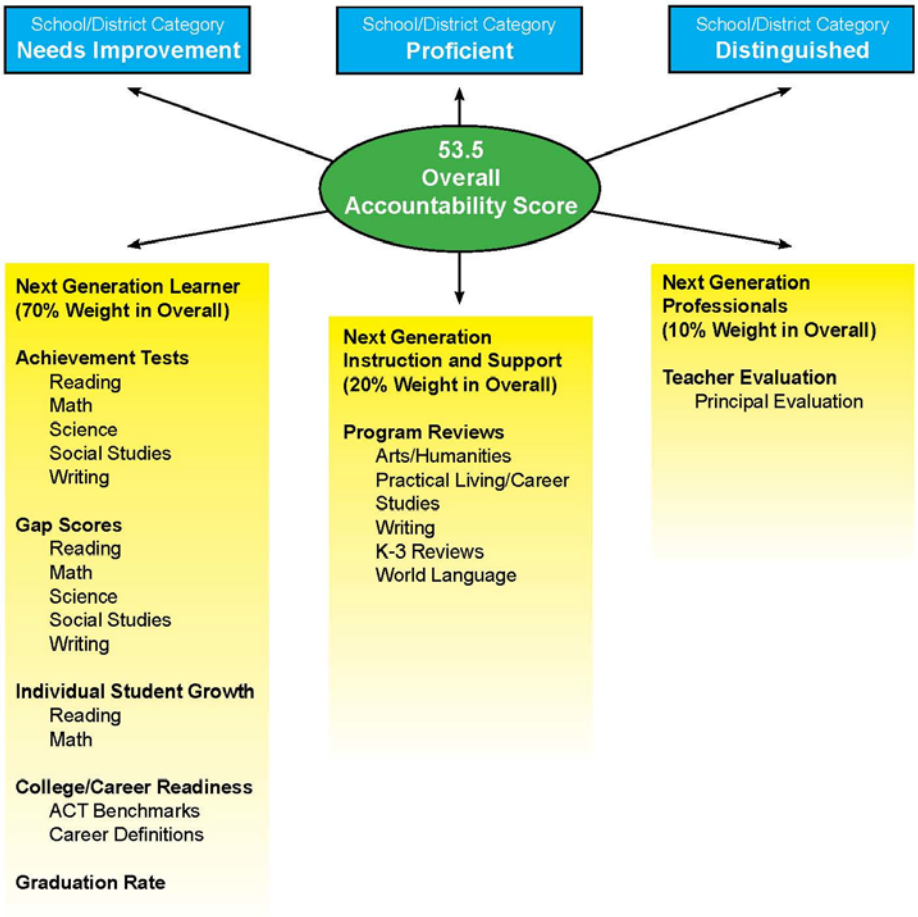
Overview of Kentucky's Accountability Model

Overview of Kentucky's Accountability Model

From a high level the model is simple. Each school/district receives an annual Overall Score based on the three components of Next Generation Learners, Next Generation Instructional Programs and Support and Next Generation Professionals. The Overall Score places the school/district into one of three categories: Needs Improvement, Proficient or Distinguished. Each of those components has a variety of indicators used to calculate the Overall Score.

The figure below illustrates how the model works.

Kentucky's Accountability Model



Detailed Narrative on Kentucky's Assessment and Accountability System

The following narrative explains in detail how the Overall Score is computed.

Education-reform legislation in 2009 paved the pathway for the next generation of school and district accountability for the Commonwealth. Following a year of discussion with educators, stakeholders and the public, the Kentucky Board of Education approved several regulations that define a new accountability model, Unbridled Learning: College- and Career-Ready for All.

Although the achievement of students continues as a critical focus and the heart of the model, Unbridled Learning expands the view of schools and districts to ensure a comprehensive look at factors that contribute to all students becoming proficient and prepared for success. The model incorporates a variety of data points and does not rely on a single narrow metric to recognize success and support improvement.

Beginning in the 2011-12 school year, this model offers a balanced approach that incorporates all aspects of school and district work organized around the Kentucky Board of Education's four strategic priorities: next-generation learners, next-generation professionals, next-generation support systems and next-generation schools/districts. The chart below details the indicators and data sources included in Kentucky's model around each of the strategic priorities. These also are specified within 703 KAR 5:200, Next Generation Learners (Attachment 20 on page 205 of the Appendix) that was approved by the Kentucky Board of Education in June 2011.

Unbridled Learning: College- and/or Career-Ready for All				
Next-Generation Learners	**Next-Generation Instructional Programs and Support**	**Next-Generation Professionals**		**Next-Generation Schools/ Districts**
Achievement (Proficiency) Gap Growth Readiness for College/Career Graduation Rate	Program Reviews	Percent Effective Teachers Percent Effective Leaders	=	Overall Accountability Score (using data from the preceding columns) Revised Report Card

Next-Generation Learners

The first component of Unbridled Learning, next-generation learners, is anchored in college and career readiness for all students. Like previous accountability models, it continues annual public reporting of disaggregated student outcome measures in required content areas. However, this more robust next-generation model also includes a focus on student achievement growth measures and performance of students in the achievement gap. It also emphasizes college and career readiness and high school graduation rates. The table below outlines the performance measures for each category in next-generation learners.

Grade Range	Achievement	Gap	Growth	College/Career Readiness	Graduation Rate
Elementary	Tests: reading, mathematics, science, social studies and writing	Tests: reading, mathematics, science, social studies and writing	Reading and Mathematics	**N/A**	**N/A**
Middle	Tests: reading, mathematics, science, social studies and writing	Tests: reading, mathematics, science, social studies and writing	Reading and Mathematics	EXPLORE (College Readiness)	**N/A**
High	End-of-Course Tests** and On-Demand Writing	End-of-Course Tests** and On-Demand Writing	PLAN to ACT *Reading and Mathematics*	College/Career-Readiness Rate	AFGR*/ Cohort Model

*Averaged Freshman Graduation Rate will be used in 2011, 2012 and 2013 reporting. Reporting using the Cohort Rate will begin in 2014.
**End-of-Course tests in 2011-12 include Algebra II, English 10 (II), Biology and U.S. History.

Achievement - Achievement incorporates student performance on state-required assessments in five content areas. Kentucky's new assessment system, Kentucky Performance Rating of Educational Progress (K-PREP), includes criterion-referenced/norm-referenced blended tests in grades 3-8 and ACT's Quality Core® program for end-of-course tests in Algebra II, English 10, Biology and U.S. History. A series of on-demand writing tests are required at elementary, middle and high school levels.

Schools and districts earn full credit for students scoring proficient and above (i.e., distinguished). If all students attain proficiency, a school/district earns 100 percent in the achievement category. To recognize the work of schools and districts as students move toward proficiency, a half-credit is awarded for apprentice students. The lowest student performance level, novice, does not receive credit in the accountability model. Calculation rules were developed to prevent strongly performing students from masking or compensating for students still performing at the lowest levels. In order to receive bonus credit for distinguished students, the school must have more students performing at the highest level than at the lowest level. The Kentucky Board of Education (KBE) directed that a bonus for distinguished be added that does not mask or overcompensate for novice performance. To calculate the bonus, each percent distinguished earns an additional one-half point, and the percent novice earns a negative one-half point, so that when the distinguished and novice values are combined, the novice points may offset the distinguished bonus. If the novice performance completely offsets the distinguished bonus, no points are added to or subtracted from the achievement calculation. The bonus calculation for distinguished does not allow a school or district to score above 100 percent.

Gap - Kentucky's goal is 100 percent proficiency for all students. The Gap category of next-generation learners focuses specifically on student groups that perform traditionally below the

achievement goal. Gap uses the same student test results as those included under achievement. The distance from that goal or gap is measured by creating a Student Gap Group -- an aggregate count of student groups that have historically had achievement gaps. Student groups combined into the Student Gap Group include ethnicity/race (African American, Hispanic, Native American), Special Education, Poverty (free/reduced-price meals) and Limited English Proficiency that score at proficient or higher.

The percent of students performing at proficient and distinguished in the Non-Duplicated Gap Group is reported annually for each content area. To calculate the combined student Gap Group, **non-duplicated counts** of students who score proficient or higher and are in the student groups would be summed. No individual student counts more than one time, and all students belonging to included groups are counted once. **The "N" count (number of students reported) is based on total school population, not grade-by-grade enrollment, thus causing almost every school in Kentucky to have a focus on gap groups.**

A sample illustrating the Non-Duplicated Gap Group for high school is shown in the chart below.

DEMOGRAPHIC GROUP	READING 2009 STUDENT COUNT	READING 2009 PERCENT (PROFICIENT + DISTINGUISHED)		READING 2010 STUDENT COUNT	READING 2010 PERCENT (PROFICIENT + DISTINGUISHED)
Non-Duplicated Gap Group*	**279**	**36.20**		**279**	**35.13**
*African-American	163	34.97		154	25.97
*Hispanic	20	50.00		15	46.67
*Native American	0	0		0	0
*With Disability	66	12.12		52	19.23
*Free/Reduced-Price Meals	237	36.71		263	35.36
*Limited English Proficiency	19	21.05		26	3.85
Other Groups Report					
All Students	303	38.28		304	38.16
Male	175	32.00		165	31.52
Female	128	46.88		139	46.04
White	107	41.12		111	50.45
Asian	4			16	50.00
*Groups included in Gap					

Key Questions and Answers

1. *Does the model lose a focus on individual gap groups by creating a single Student Gap Group?*

No. The model actually fixes problems with a more traditional approach to gap groups. A major problem of using individual groups is the count of students. Small student counts allow a school to ignore small groups of students. The Kentucky model solves the problem by putting all gap groups into a single group. In the past, many schools would not have to worry about subgroups with small n-counts. By placing all the subgroup students into one single group, the n-count increases for all schools.

In simulations for all Kentucky schools, 99 percent of the schools in the state would have a Student Gap Group; thus, the model actually increases the motivation for schools to improve the achievement of all students. In the high school sample chart found above, two groups, Limited English Proficient and Hispanics, could have been ignored in traditional models due to the n-counts, but in the single Student Gap Group model, all students would need to be targeted for growth. In the 2011 NCLB reports, only 21% of the schools had African American subgroups and only 25% of the schools had a Students with Disabilities (SWD) subgroup, but the percent of Kentucky schools with African Americans was 85% and the percent of Kentucky schools with SWD was 100%. The Student Gap Group that exists in 99% of the schools creates an incentive to increase achievement for all students. Students cannot be ignored.

In addition, the new model provides a single goal for schools. In the old model, there were up to 16 individual gap group goals. By reducing the goals from 16 to 1, the focus of the school can be targeted and managed in a more efficient way. Schools are not overwhelmed by the myriad of goals facing them; they focus on one single goal, and by raising that one goal, the achievement rises for the subgroup students.

2. *Will subgroups scores be reported?*

Yes, all subgroup performance will be publically reported, and all subgroups will have Annual Measurable Objectives (AMOs) created through the Kentucky Board of Education's strategic planning process.

3. *Will students participating in the alternate assessment program be fully included in Kentucky's assessment and accountability system?*

Yes. Kentucky's alternate assessment students will be included in each component of the system. How alternate assessment students are included in the Next-Generation Learner categories of achievement, gap, growth, college/career readiness and graduation rate is described in the following paragraph.

Alternate assessment students complete attainment tasks for reading, mathematics, science, social studies and writing. Alternate assessment student performance levels -- Novice, Apprentice, Proficient and Distinguished -- describe student results. These performance levels

are used to include alternate assessment students in achievement and gap calculations. Growth is based on a student growth percentile. Psychometric staff is currently working to generate a student growth percentile for alternate assessment students. In the area of college and career readiness, a checklist called the Transition Attainment Record (TAR) is used as the alternate for EXPLORE, PLAN and the ACT. A standard setting process will establish a cut on the TAR as a career measure for alternate assessment students. Alternate assessment students receive a certificate of attainment instead of a standard diploma. Kentucky follows the federal guidance on the calculation of graduation rate and alternate assessment students; the certificates of attainment do not count as graduates in the graduation rate formula.

Detailed Narrative on Kentucky's Assessment and Accountability System (Continued)

Growth - The Growth category uses a Student Growth Percentile. It compares an individual student's score to the student's academic peers. It recognizes schools and districts for the percentage of students showing typical or higher levels of growth. The scale for growth is determined at equal intervals with typical growth beginning at the 40th percentile. For elementary and middle schools, growth is based on annual reading and mathematics tests in grades 3-8. At high school, the same model of recognizing student performance along a scale uses the PLAN (grade 10) and ACT (grade 11) composite scores in reading and mathematics for comparison. Points are awarded for percentage of students showing typical or higher growth.

College/Career Readiness - The Commonwealth of Kentucky is focused on making college and career readiness a reality for every Kentucky student. To identify students as college- and career-ready, the Kentucky Board of Education (KBE) has approved indicators of readiness that include students meeting:
(1) the Kentucky Council on Postsecondary Education's Systemwide Benchmarks on the ACT in Reading (20), English (18) and Mathematics (19)

or

(2) the Kentucky Council on Postsecondary Education's College Placement Test Benchmarks

or

(3) career academic and technical benchmarks

The following chart represents the definition of College/Career Readiness approved by the KBE in August 2011.

Kentucky Department of Education Proposal: Career Measures Definition
College Ready, Career Ready, and College AND Career Bonus

College Ready: Must meet benchmarks on one of following:

College Ready
ACT
COMPASS
KYOTE

Career Ready: Must meet benchmarks for one requirement in Career Academic area and must meet one requirement in Career Technical area.

Career Ready Academic	Career Ready Technical
Armed Services Vocational Aptitude Battery (ASVAB)	Kentucky Occupational Skills Standards Assessment (KOSSA)
ACT Work Keys (Applied Math, Locating Information, and Reading for Information)	Industry Certificates

Bonus - College AND Career Ready: Must meet at least one from each area.

College Ready Academic	Career Ready Technical
ACT or COMPASS or KYOTE	KOSSA
Notes: (1) By meeting the college ready academic definition, the student does not have to take the additional tests of ASVAB or WorkKeys for the bonus area. (2) For accountability purposes, the bonus shall not allow the readiness percentage to exceed 100 percent.	Industry Certificates

The College/Career Readiness Rate (CCRR) is a percentage calculated by dividing the number of high school graduates who have successfully met an indicator of readiness for college/career with the total number of graduates. The indicators of readiness include student performance on the ACT, completion of college placement tests or attainment of Career-Ready Academic and Career-Ready Technical benchmarks. The KBE approved a half-point bonus to be added to the report for students who are considered both college- and career-ready.

In September 2010, a Readiness goal was established for schools, districts and the state to improve their 2010 Readiness percentages by at least 50 percent. The improvement goal was derived by subtracting the 2010 readiness percentage from the maximum of 100 percent readiness, then dividing by two. This value was then added to the 2010 percentage to establish a 50 percent improvement goal for 2015.

While reporting will continue to show an improvement goal, the percentage of students demonstrating readiness (i.e., Readiness Rate) will be included in next-generation learners. For the middle school level, college readiness is based on student performance on the EXPLORE assessment administered at Grade 8. The percent of students meeting the ACT-established benchmarks for EXPLORE in reading (15), English (13) and mathematics (17) is reported. The percent of students meeting the benchmark in each content area is averaged to generate a middle school college readiness percentage.

Graduation Rate - A graduation rate for each school and district will be reported annually as a category of next-generation learners. The U.S. Department of Education (USED) has approved

Kentucky's use of the Averaged Freshman Graduation Rate (AFGR) calculation formula for reporting in 2011, 2012 and 2013. AFGR allows Kentucky to report graduation rates disaggregated by student groups while Kentucky implements data collection for the reporting of the Cohort Rate in 2014. AFGR does assume an equal inflow and outflow of students. Many of Kentucky's communities are losing population, and AFGR does not have a process to account for such changes.

Through a separate waiver request, Kentucky is seeking permission from the USED to use the Cohort model for a small number of these schools and districts instead of the AFGR.

Overall Score Reporting for Next-Generation Learners - Individual student data collected from the assessments and college/career readiness and graduation rates generate a numeric value for each category of next-generation learners -- Achievement, Gap, Growth, College/Career Readiness and Graduation Rate. The value for each category is weighted to create a final overall score for next-generation learners. The following table illustrates the weights.

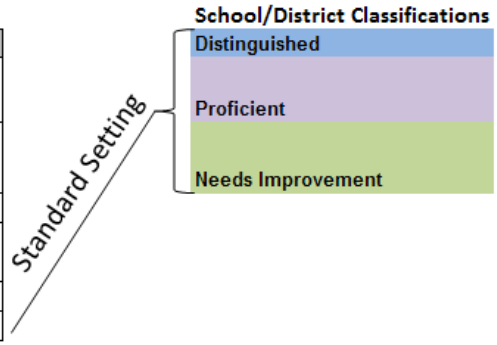
Grade Range	Achievement	Gap	Growth	College/Career Readiness	Graduation Rate	Total
Elementary	30	30	40	**N/A**	**N/A**	**100**
Middle	28	28	28	16	**N/A**	**100**
High	20	20	20	20	20	**100**

The KBE approved that students enrolled for a full academic year (a minimum of 100 instructional days) will be included in the calculations for Achievement, Gap, Individual Student Growth and Readiness for College/Career for a school and district. For Graduation Rate, students enrolled and students earning diplomas will be included in the calculations. Next-Generation Learners will report a single number combining the categories.

KBE asked that, within each classification, an indicator be added to show the direction in which the performance of the school/district is moving. This is illustrated by the figure below.

Kentucky High School Sample

	Raw Score	School Weighted Score
Achievement Points Earned	67.5	13.5
Gap (Percent Proficient and Distinguished)	39%	7.8
Growth (Percent Typical or Higher)	49.50%	9.9
College/Career Readiness (Percent of Students Ready)	38%	7.6
Graduation Rate	83%	16.6
Total	N/A	55.4



<u>Next-Generation Instructional Programs and Support</u>

The second component of Unbridled Learning, next-generation instructional programs and

supports, is based on requirements from legislation enacted in 2009 that established Program Reviews as part of a new assessment and accountability model. A Program Review is: *"…a systematic method of analyzing components of an instructional program, including instructional practices, aligned and enacted curriculum, student work samples, formative and summative assessments, professional development and support services, and administrative support and monitoring."*(KRS 158.6453(1)(i))

Program Reviews are required in legislation for arts & humanities, writing and practical living/and career studies. The KBE expanded the legislative requirements by adding K-3 and world language Program Reviews. (See Attachment 21, page 213 of the Appendix, 703 KAR 5:230, Next Generation Instructional Programs and Support, for the Program Review requirements adopted by the Kentucky Board of Education in August 2011 with additional amendments made in October 2011.) The Program Reviews serve a number of purposes, which include:

- improving the quality of teaching and learning for all students in all programs
- allowing equal access to the 21st century learning skills that will assist them in being productive citizens to all students
- allowing student demonstration of understanding beyond a paper-and-pencil test
- ensuring a school-wide natural integration of the program skills across all content, beyond the program areas

The review of a program should be an ongoing, year-round, reflective process. Through careful review, schools will be able to identify strengths, which can be shared with other programs within the building. A careful review also will allow for the identification of weaknesses and areas of growth. It is to a school's advantage to communicate the Program Review process and documents to all staff. As staff members identify their roles in supporting school programs, they can contribute to the process of evidence identification and program improvement.

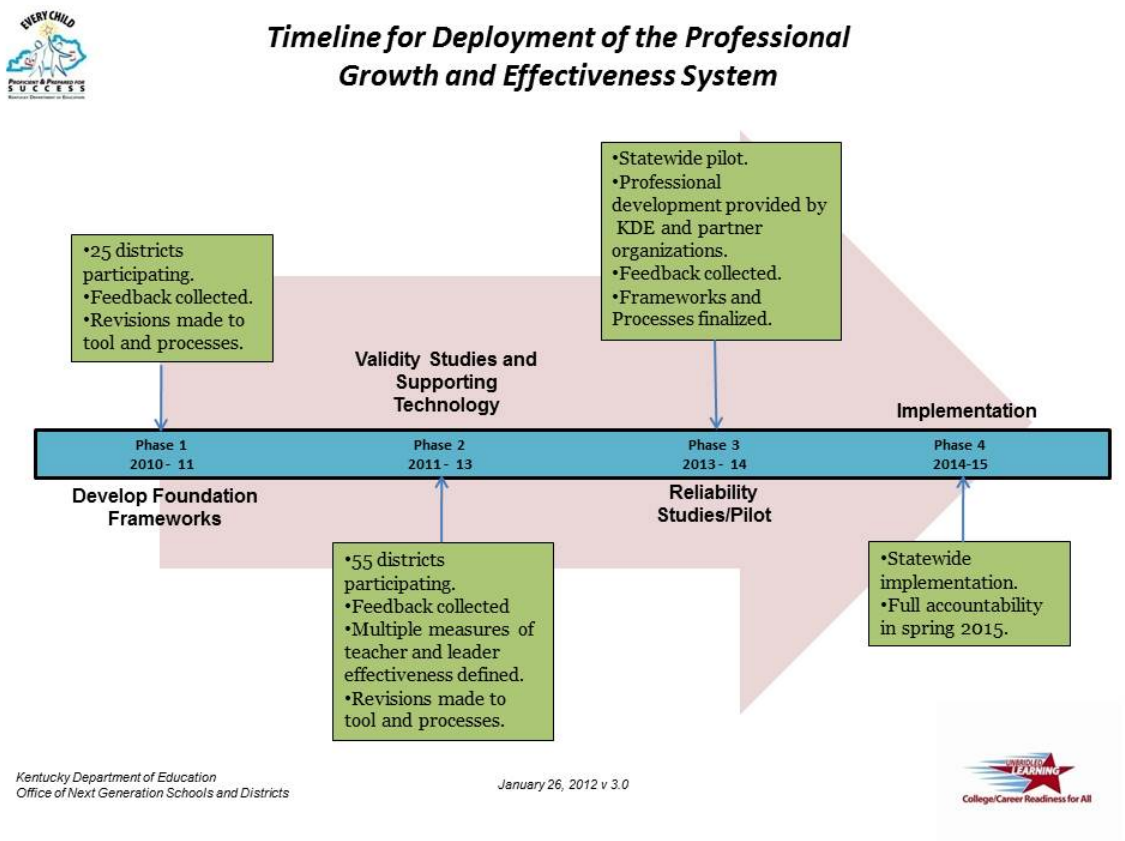
Next-Generation Professionals

The third and final component of Unbridled Learning, next-generation professionals, recognizes that student success is supported by effective educators. The goals of this component are to equip educators with critical tools, including guidance, systems of support and a measurable model of educator effectiveness based on student achievement. Schools and districts need support to identify and recruit educators, ensure diversity, and retain and professionally grow an educator workforce of the highest quality to teach in Kentucky schools.

The vision for the Professional Growth and Effectiveness System (PGES) is to have every student taught by an effective teacher and every school led by an effective principal. The goal is to create a fair and equitable system to measure teacher and leader effectiveness and act as a catalyst for professional growth. The system will consist of multiple measures of student growth as well as components to measure leadership, professionalism, instruction, learning climate and assessment practices. The key strategies to design and implement the system include collaboration with education partners and the intentional involvement of school districts and schools, along with support and guidance from steering committees.

Next-generation professionals reporting will share at an aggregate level, the percent of teachers and leaders at the accomplished level on Kentucky's new Professional Growth and Evaluation System. The Kentucky Department of Education will not report individual teacher or leader evaluation data.

In the figure found below, the timeline for the deployment of the Professional Growth and Evaluation System is reflected, also indicating when this component will be included in the state's accountability (spring 2015).



Overall Score for Unbridled Learning: College- and Career-Ready for All

Schools and districts will receive reports for each component (Next-Generation Learners, Next-Generation Instructional Programs and Support, and Next-Generation Professionals) that place them in a classification (Distinguished, Proficient, Progressing and Needs Improvement). Then, an overall score for Unbridled Learning: College- and Career-Ready for All system will be assigned to each school/district. This combined score will be compiled by weighting the three components in the following manner:

Next-Generation Learners	70%
Next-Generation Instructional Programs and Support	20%
Next-Generation Professionals	10%
Overall Score	100%

The Overall Score process is specified within 703 KAR 5:225, School and District Accountability, Recognition, Support and Consequences that was originally approved by the Kentucky Board of Education in August 2011; however, it underwent revisions to align the regulation with the ESEA waiver requirements and secure additional constituent review and came back to the board in February 2012 for approval. Then, due to technical issues found in the regulation when it was filed with the Legislative Research Commission, the number and name of 703 KAR 5:222 was changed to 703 KAR 5:225, School and District Accountability, Recognition, Support and Consequences, and another public hearing was held that resulted in further changes to the regulatory language. The board approved those changes in June 2012.

Until the other components are completed, only the Next-Generation Learners component will be used to generate an overall score for accountability in the first year of the system. The following chart provides the overall score phase-in for the three components.

Overall Score Phase-In

Year	Component	Percentage of Overall
2011-12	**Next-Generation Learners**	**100%**
2012-13	**Next-Generation Learners** **Next-Generation Instructional Programs and Support**	**77%** **23%**
2014-15	**Next-Generation Learners** **Next-Generation Instructional Programs and Support** **Next-Generation Professionals**	**70%** **20%** **10%**

The single overall accountability score will be the trigger for recognition and support for schools and districts and the creation of Annual Measureable Objectives (AMOs). The overall number incorporates a robust set of success factors, but remains strongly focused on the performance and attainment of individual students, with 70 percent of the overall score derived from Next-Generation Learners. This single overall accountability number reflects far more than student performance on a single test, but is heavily weighted toward student achievement.

Key Questions and Answers

1. *Does the Kentucky model raise the "bar" for students?*

Yes, the Kentucky accountability model raises the expectations for students since it is aligned with college- and career-ready standards and includes emphasis on multiple indicators. See the illustration below.

Old Model	New Model
Standards Kentucky-Developed Standards **Indicators** Achievement Gap Graduation Rate	**Standards** College Readiness Standards (accepted by all Kentucky public colleges and universities) **Indicators** Achievement Gap Student Growth College/Career Readiness Graduation Rate Program Reviews Professional Evaluation

The new college- and career-readiness standards are more rigorous than the previous state-developed standards. The ultimate goal of the system is that every student is college- and/or career-ready. The new standards raise the bar for educators, students and parents in Kentucky.

2. *Will the weights of the system ensure that all students achieve the college- and career-ready standards?*

Next-Generation Learners is the component of the model that uses individual student achievement. This component is intentionally weighted at 70 percent in order to put leverage on all students meeting college- and career-readiness standards. In addition, within Next-Generation Learners, the high school components of achievement, gap, growth and college readiness all connect to the ACT, PLAN and end-of-course tests that link to college/career readiness standards. The Grade 3-8 tests are linked to the high school college/career standard. A school cannot make gains in the accountability system without improving the achievement levels of all students.

3. *Since there are so many indicators, can a school game the system?*

The weight on each component helps alleviate gaming of the system. Next-Generation Learners accounts for 70 percent of the Overall Score. This component contains the achievement scores, gap scores, individual student growth and college and career readiness rates. Each of these areas relies heavily on the academic tests in the system. In order to move the Overall Score number, schools will have to raise achievement. Achievement stays in the forefront in this model. Schools will need to concentrate on the Next-Generation Learners component to make gains in the system.

4. *Why is Kentucky using the Averaged Freshman Graduation Rate (AFGR) during the first years of the system?*

Kentucky changed vendors for its statewide Student Information System (SIS) in 2008. The first time the new system could flag first-year freshmen was in 2009. This caused the Cohort Rate to be delayed until 2013. During the interim period, Kentucky is using AFGR. This has been approved by the U.S. Department of Education.

5. *Is the 40th percentile cut score for the Student Growth Percentiles (SGP) Model too low?*

Two reasons exist for choosing the 40th percentile: (1) Kentucky's choice of the 40th percentile acknowledges a type of confidence interval and it reflects the fact that there are SGPs below the 50th percentile that are statistically no different than 50 and (2) when simulation data was run, students in grades 3-12 who scored at or above the 40th Student Growth Percentile show an average of 5.8 scale score growth in mathematics and an average of 6.3 scale score growth in reading. Kentucky's scale score range is 20 points between Novice and Apprentice, Apprentice and Proficient, and Proficient and Distinguished. Students scoring above the 40th SGP are demonstrating 1/3 of the growth needed to change levels. On average a student who reaches the 40th SGP would grow from Novice to Apprentice or Apprentice to Proficient in three years. This type of growth is more than adequate and it demonstrates the 40th SGP is based on sound statistical data.

As part of the ongoing research project in the state's accountability model, the Kentucky Department of Education will conduct research into how the 40th percentile cut score correlates with student achievement. This research will start with the 2011-12 results and then culminate with the 2012-13 results. The results of the study will inform the decision concerning the setting of the 40th percentile.

Detailed Narrative on Recognition, Support and Consequences

At its center, Kentucky's recognition, accountability and support system has an assessment system that uses multiple indicators to measure progress in the areas of achievement, gap, growth, college and career readiness and graduation rate. As a result of 2009's Senate Bill 1 and new requirements related to the federal School Improvement Grant process and the requirements of the federal State Fiscal Stabilization Fund, Phase 2, Kentucky developed a new system of Educational Recovery as a part of the Unbridled Learning initiative. This model has guided the turnaround process in Kentucky's persistently lowest-achieving schools and remains in use. As a result of Kentucky's extensive work in development of that system, and because of the level of success achieved to date, the decision was made to continue the District 180 model as the centerpiece of our rewards and accountability system and to use the flexibility afforded by the ESEA waiver to expand the concept, include additional methods of assistance to schools, provide more individualized feedback and support, and ascertain the scalability of all or some of the components on a statewide basis. While the process has been used with schools identified as persistently-lowest achieving in the past, it will now be used with Priority Schools and expanded to organize, inform and support the processes used with Focus Schools and other schools not satisfactorily progressing.

The guiding principle of the District 180 concept is to support schools in the creation of systems that will result in teacher efficacy and student improvement. In too many turnaround processes, the interventions designed to create improvements are externally imposed. This often leads to success during the period that the external assistance is available, but a reversion to previous practice once the supports are removed. The District 180 process is designed to build capacity in schools, districts, universities, educational cooperatives and KDE staff in order to increase their effectiveness, as well as to create lasting relationships between these groups that will provide a continuous process of learning and support for all schools across the Commonwealth.

In Priority Schools, a formal review process is the means by which areas of improvement are identified and prioritized, and the Comprehensive School Improvement Plan is the means by which these prioritized needs are addressed. For the Priority Schools, School Improvement Grant applications outline the strategies that will be funded through that process. Capacity building begins with targeted professional development, including the organization of Teacher Turnaround Teams. Schools develop shorter-term, 30-60-90-day plans to address immediate concerns and have access to the planning and monitoring component of the Adaptive System of School Improvement Support Tools (ASSIST) process to develop long-range plans and monitor implementation and impact.

To assist in greater expansion of these practices to all schools in need of improvement, Kentucky will use waivers of the following provisions:

- identification of school districts and Title I schools for improvement, corrective action or restructuring if they fail to make AYP for the specified number of years
- limitations of participation in and use of Small Rural School Achievement and Rural and Low-Income Schools funds
- the requirement that a school have a poverty percentage of 40 percent or more in order to operate a school-wide program
- the requirement that 1003(a) funds may only be used for schools identified for improvement, corrective action or restructuring
- the restrictions on the use of rewards funding
- restrictions on the amount of funding that may be transferred from other programs into the Title I program
- the definitions and requirements regarding how 1003(g) funding may be used

These waivers will allow Kentucky the flexibility to combine:

- 1003(a) funds
- the 20 percent of the local Title I allocation previously reserved for Supplemental Education Services (SES) and transportation funding
- the regular Title I Part A and Title II Part A allocations
- any other available federal funds in accordance with the requirements of those programs
- any other available state and local resources

Further, Kentucky will allow schools eligible to be identified as Priority and Focus Schools that are currently identified as Targeted Assistance Schools to become school-wide programs.

Some of the activities that this will allow include:

- providing additional training to extend the learning for Educational Recovery Specialists, Educational Recovery Leaders and other staff to work with Teacher Turnaround Teams in year-long institutes to offer intensive follow-up in order to build capacity within schools serving traditionally disenfranchised students
- focusing on greater individualization of school plans and the provision of additional support for differentiated follow-up based upon the needs identified in the school/district plan by utilizing a planning and monitoring tool
- incentivizing and spotlighting valued practices and valued results by identifying and targeting rewards schools as demonstration sites for Priority, Focus and Needs Improvement Schools
- determining methods by which to support schools in the implementation of extended learning time and additional methods to increase teacher effectiveness

Other activities specifically focused on improving the performance of English language learners and students with disabilities are outlined in Kentucky's Achievement Gap Delivery Plan (Attachment 29 on page 317 of the Appendix). Since these students generally make up a disproportionate number of the students in the gap, successful strategies must be implemented across several levels simultaneously. Planning must occur across various levels to allow for individual interventions to be effective at the student level.

At the state level, collection of more specific information regarding these groups of students will be included in the electronic ASSIST planning tool, which will require schools to address the needs of these student populations through the planning process. Based on those needs, the Kentucky Department of Education will assist districts to ensure professional development will be designed and delivered that will include training on different collaboration models to support students with disabilities and on how to implement differentiated instructional strategies that will reach these students. Education Recovery staff will be trained on strategies for closing gaps (with specific attention to these two groups of students) and will serve as a resource to staff working with other schools.

Professional development will also be provided on the stakeholder-developed "*Guidelines for Closing the Gaps for all Students"* document, which outlines critical strategies for schools and districts to use as they identify and begin to address the issues that have given rise to the gaps. In addition, a summer progression plan will be promoted, including the "Find a Book" website involving a partnership with the Council of Chief State School Officers (CCSSO) and Metametrics.

Other activities that will be implemented include development of an Alternative Individual Learning Plan for students in alternative schools that hold both the sending and receiving schools accountable for their academic progress (many students served in these schools fall into one of these categories) and providing assistance and support to districts in assuring additional digital learning environments and opportunities designed to engage disenfranchised students are made

available. Individual profile sheets in reading and mathematics will be developed for students with disabilities and English language learners to monitor their success.

Kentucky's Proficiency Delivery Plan found in Attachment 30 on page 324 of the Appendix, includes other supports that will address the needs of these student groups. The Kentucky System of Intervention (KSI) (Kentucky's Response to Intervention, RtI process), which is included in the plan, provides individual identification of student needs and responses tailored to address their learning issues. Intervention strategies for these groups of students will be monitored through the ASSIST tool to increase the likelihood of implementation fidelity.

Ultimately, Kentucky will utilize the flexibility to target capacity building within Priority and Focus Schools through better-trained educational recovery experts; a sustainable professional development plan that creates highly effective teachers within schools that serve the areas of highest need; and a rewards system that identifies, magnifies and incentivizes results.

Kentucky has shown a commitment to supporting its most disenfranchised students. This waiver will provide the flexibility needed to identify and support schools in an innovative way. Kentucky will see student and school success through multiple methods. It also will enable the state to focus support ensuring deliverables are achieved in the following ways.

Priority Schools	• better-trained capacity building experts • Formal review process connected to Planning/School Improvement Grants • better-trained capacity building experts • Diagnostic Reviews • professional development experiences aimed toward teacher turnaround teams • system of identification based on a multiple indicators such as AMO/AYP • extended learning time • connecting Priority Schools to professional growth opportunities through effective teacher evaluation
Focus Schools	• focus on closing gaps in high-gap schools • an electronic planning and monitoring process through ASSIST (Adaptive System of School Improvement Support Tools) • flexible system to respond to schools not addressing the gap
Needs Improvement	• access to an electronic planning and monitoring process known as ASSIST • access to effective teacher evaluation system and training (in future) • Title I staff consultancy/resource • corrective action district coaching and training

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

Option A	**Option B**
☐ 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.	☒ 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 focus schools, it must: **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 **(Attachment 8, page 79 of the Appendix)** 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.

Guidance Question: Did the SEA include 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 focus schools?

Attachment 8 in the Appendix on page 79 provides 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.

Since major education-reform legislation was passed in 1990, Kentucky has been committed to students receiving a well-rounded educational experience. Schools and districts must provide for instruction beyond reading and mathematics and be accountable for student performance in multiple content areas. Kentucky's new assessment and accountability program requires summative or end-of-course testing in five content areas (reading, mathematics, science, social studies and writing). Each content area contributes equally in the Next-Generation Learner categories of achievement and gap. The category of growth, using a student growth percentile, requires testing of the content area for two years consecutively. Growth includes reading and mathematics results only. Reading and mathematics testing is required annually in grades 3-8. At high school, Kentucky requires PLAN at grade 10 and ACT at grade 11. The reading and mathematics tests in PLAN and ACT will be used in the growth calculations. The end-of- course tests are administered as students complete course work; therefore, students will take the tests throughout the high school experience.

The content areas of arts and humanities, practical living/career studies and writing are assessed using Program Reviews. (The Kentucky Board of Education also is considering the addition of Program Reviews for K-3 and world language.) The Program Review results are included in the Next-Generation Instructional Programs and Support component of Unbridled Learning. Each content-area Program Review contributes equally to the score of this accountability component. The three Program Review areas required in legislation (arts and humanities, practical living/career studies and writing) will enter the accountability system in 2012-13 following a full-scale implementation pilot in 2011-12. A proposed Program Review in K-3 will have a full-scale implementation pilot in 2012-13 and enter the accountability system in 2013-14. A proposed world language Program Review will have its full-scale implementation pilot in 2014-15 and will enter the accountability system in 2015-16.

2.B SET AMBITIOUS BUT ACHIEVABLE ANNUAL MEASURABLE OBJECTIVES

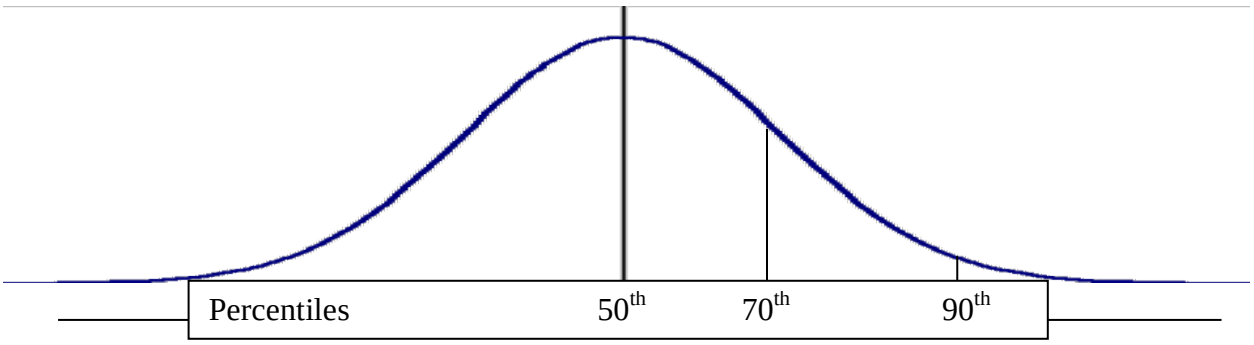
Select the method the SEA will use to set new ambitious but achievable annual measurable objectives (AMOs) in at least reading/language arts and mathematics for the State and all LEAs, schools, and subgroups that provide meaningful goals and are used to guide support and improvement efforts. If the SEA 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	Option B	Option C
☐ Set AMOs in annual equal 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. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☐ Set AMOs that increase in 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. i. Provide the new AMOs and an explanation of the method used to set these AMOs.	☒ Use another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools, and subgroups. i. Provide the new AMOs and an explanation of the method used to set these AMOs. ii. Provide an educationally sound rationale for the pattern of academic progress reflected in the new AMOs in the text box below. 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, page 79 of the Appendix)**

Guidance Question: Did the SEA describe the method it 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 through one of the three options?

Kentucky chooses Option C – another method that is educationally sound and results in ambitious but achievable AMOs for all LEAs, schools and subgroups.

Overview of Accountability Categories and Annual Measurable Objective



Needs Improvement	Proficient	Distinguished
Progressing: Schools making AMO/AYP		
Priority Schools		
Focus Schools - (1) 10% Gap Group		
Focus Schools – (2) Third Standard Deviation Model to Locate Individual Gap Groups		

Kentucky's model is a continuous improvement model requiring schools to increase achievement across time. The ultimate goal of the system is to move all schools to an Overall Score of 100.

The model uses a normative approach.

1. Each school/district receives a single Overall Score (explained in Section 2A).
2. The Overall Score places school/district into a category: Needs Improvement, Proficient or Distinguished.
3. The Overall Score will be used to create an annual improvement goal for all schools. The annual goal is called an Annual Measurable Objective (AMO).
4. Using the Overall Score, a mean and standard deviation is computed for each level (elementary, middle, high).
5. The goal in each cycle for below proficient schools/districts is to move one-third of a standard deviation in a five-year period. Each annual goal would be to move .07 of a standard deviation.
6. The Overall Score and AMO status would locate schools for recognition and support.
    a. Priority Schools are the currently identified persistently low-achieving schools (PLAs).
    b. Focus Schools (Group 1) are the bottom 10 percent of all Title I schools using the Student Gap Group Score as the indicator.
    c. Focus Schools (Group 2) uses the Third Standard Deviation Model to locate individual gap groups needing improvement. All schools from high-performing to low-performing may have gap groups needing improvement.
    d. Schools of Distinction, Highest Performing are in the 95th percentile or higher of all schools on the Overall Score and have met their current year AMO/AYP.

e. Distinguished schools are in the 90th percentile or higher of schools on the Overall Score and have met their current year AMO/AYP.
f. High Progress Schools have the top 10 percent improvement over a two-year period and have met their current-year AMO/AYP.

7. All schools making their AMO/AYP would also be called Progressing. Schools falling outside the Proficient or Distinguished categories and not making AMO/AYP would be called Needs Improvement.

Elementary School AMO Example
Mean of Overall Score = 68 Standard Deviation = 10 Annual Goal = .7 (which means a growth of 3.5 points over five years or a growth of approximately one-third of a standard deviation from the starting point)

8. Prior to making the AMO and being placed into a category, all schools would need to meet a 95% participation rate for all groups of students being tested, and the high schools would need to meet their individualized graduation goal.

Detailed Narrative of the Accountability Categories and Annual Measurable Objective

The new Kentucky accountability measure is built upon the concept of a continuous improvement model. Continuous improvement models are used by major corporations (i.e., Toyota) and major educational reform groups (i.e., Baldrige Performance Excellence Program). The goal of continuous improvement is to improve the system of education constantly and forever by improving the quality of student achievement. By using a continuous improvement model, Kentucky will be able to set realistic, statistically-based goals that are achievable, but constantly stretch schools to continually improve. The goal of continuous improvement is to reduce the variation in school performance by moving the entire group of schools to higher and higher performance. As schools reach a performance level, the group goal is shifted to stretch the goal to a higher level. Over time, goals continually increase based on group performance, and as the low-end schools improve, variability is decreased. The ultimate goal is reaching the score of 100 in the Overall Score.

Method - As described in section 2A, the new Kentucky accountability model will create a single Overall Score for three major components. Those three components are:

(1) Next-Generation Learners, which incorporates achievement scores (reading, mathematics, science, social studies and writing), gap scores, individual student growth, college/career readiness and graduation rate

(2) Next-Generation Instructional Programs and Support, which incorporates Program Reviews in the areas of arts/humanities, practical living/career studies, writing, K-3 and world languages

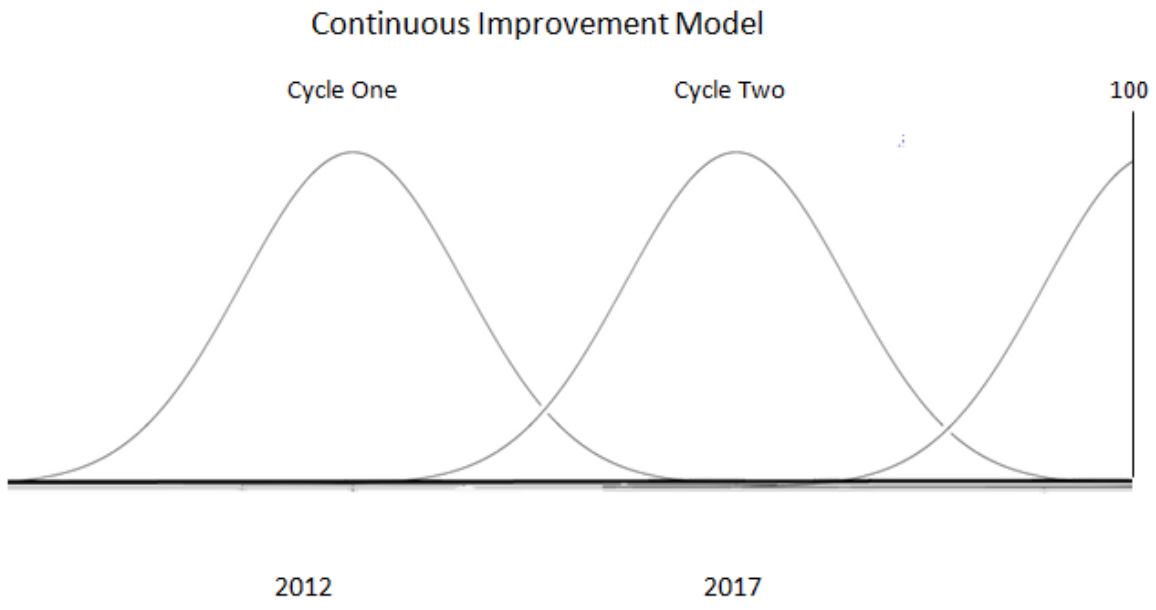
(3) Next-Generation Professionals, which incorporates measures of teacher and leader effectiveness

The Overall Score broadens the concept of school success to include a multifaceted, balanced set of indicators.

The Overall Score will be used to create the distribution of schools in the state. The 70th percentile will be the Proficient level, and the 90th percentile will be the Distinguished level. All schools falling under the Proficient level will be called Needs Improvement Schools. The top 5 percent will be Kentucky Schools of High Distinction and are described in the Rewards Section. Schools already designated as persistently lowest-achieving schools (PLAs) pursuant to Kentucky state law (KRS 160.346) will be the Priority Schools. All schools, both Title I and non-Title I, would have an AMO/AYP goal.

Using the Overall Score, Kentucky's continuous improvement model will compute, by level, an average state score and standard deviation. The standard deviation rate for each level will be divided by five to generate a growth goal for that period of years. The Annual Measurable Objective (AMO) will require a school to gain .07 of a standard deviation for each year in the five-year period, thus equaling an approximate growth of one-third of a standard deviation in the five-year period. The AMO/AYP goal is locked in for the five-year period, but at the end of the five-year period a new set of averages and standard deviations would be run to set the next five-year goal. An acceptable level of Proficient performance would be set at the 70th percentile; this score line provides an acceptable zone for schools scoring at the top end of the distribution. The 70th percentile was intentionally chosen because it places schools in approximately the top 30 percent of the distribution and it provides a score that educators, parents and the public can understand.

Schools scoring below the Proficient level would need to achieve the full AMO described above. Proficient or higher scoring schools would need to achieve one-half of the state AMO/AYP goal. Using this method, the lower-achieving schools must improve at a higher rate than the top-scoring schools. See the figure below for an illustration of the model.



Every school in the state will have an AMO/AYP goal. If the school obtains the AMO goal, then

the school has made Adequate Yearly Progress (AYP) if it also meets the required participation rate and the graduation goal if it is a high school.

In addition, annual data runs would occur to monitor the shifting of the average and standard deviations. **During the five-year period, Kentucky would constantly evaluate the system for modifications.**

This model accomplishes several important goals. First, since it is based on a distribution and continuous improvement model, low-scoring schools would have achievable goals because there are many, many schools above them that show the scores are obtainable. Second, all schools will have a standard deviation target based on a statistical model, thus creating a fair, achievable goal. Third, as the schools increase their scores, the goals are re-set at the end of the five-year period for the group, thus ensuring that all schools are constantly and forever increasing their performance. There is no end date in this model; it continues with the ultimate goal of 100 percent on the Overall Score as the target. As it continues, the group average will rise, the standard deviation will decrease, and schools continue on an ever-increasing path toward excellence.

The table below provides a visual description of the AMO goals. (Option C, item i.)

AMO Simulated Data for Illustration Purposes -- Winter 2010						
	Average	Stdev	AMO for schools scoring below proficient (Stdev/5-Year Goal)	AMO for schools scoring above proficent (Stdev/5-Year Goal x .5)	70th Percentile	
Elementary School	68	20	1.4	0.7	73.7	
Middle School	61	18	1.3	0.63	65.4	
High School	52.8	15	1.1	0.525	56.2	
Elementary Sample	Baseline	Year 1	Year 2	Year 3	Year 4	Year 5
School A (Low)	58	59.4	60.8	62.2	63.6	65.0
School B (Average)	68	69.4	70.8	72.2	73.6	74.3
School C (High)	78	78.7	79.4	80.1	80.8	81.5
			-			
Middle Sample	Baseline	Year 1	Year 2	Year 3	Year 4	Year 5
School A (Low)	52	53.3	54.5	55.8	57.0	58.3
School B (Average)	61	62.3	63.5	64.8	66.0	66.7
School C (High)	71	71.6	72.3	72.9	73.5	74.2
			-			
High Sample	Baseline	Year 1	Year 2	Year 3	Year 4	Year 5
School A (Low)	44.9	46.0	47.0	48.1	49.1	50.2
School B (Average)	52.8	53.9	54.9	56.0	57.0	57.5
School C (High)	60.7	61.2	61.8	62.3	62.8	63.3
70th percentile is the line of proficient performance.						
Shaded area shows scores above the line of proficient performance.						
Once a school reaches proficiency (shaded area), the AMO comes from scoring above proficient.						
Rounding accounts for slight differences in the cells above.						

Phase-In of Components – The three major components of Unbridled Learning: College- and Career-Ready for All phase in over a three-year period. In 2011-12, the Next-Generation Learners component becomes operational. In 2012-13, the Next-Generation Instructional Programs and Support component is added, and finally, the Next-Generation Professionals component is added in 2014-15. The AMO goals described above would provide a clean baseline and goal for the end of each school year. As a new component is added, the baseline average and standard deviation would be computed, and a new annual goal would be developed. After the last component is added in 2014-15, the model is complete, and the baseline and goals can be computed for a new goal.

All schools, Title I and non-Title I, are eligible to be Reward, Priority or Focus Schools. All

schools would be placed on the same distribution scale; however, the final reports will show Title I and non-Title I Reward, Priority and Focus Schools.

Locking the Goal for Five Years

Until all three components of the Unbridled Learning: College- and Career-Ready for All system are phased in to the model, annual baselines and goals will be set. Once all three components are operational in 2013-14, the distribution will be calculated to locate the 70th percentile (Proficient) and the 90th percentile (Distinguished). The raw score associated with these cut points will then be locked for a five-year period. By locking the goal lines at the raw score, all schools will be allowed to have a consistent five-year goal that will not change. At the end of the five-year period, the distribution will be recalculated, and a new set of cut points will be determined. Then, those cuts will be locked for a five-year period. With full implementation of the model, schools are not faced with an annual redistribution of scores, but have a solid goal to work toward.

For Option C, item iii., see Attachment 8 on page 79 in the Appendix for a copy of the average statewide proficiency based on assessments administered in the 2010-11 school year in reading/language arts and mathematics for the "all students" group and all subgroups.

Participation Rate

Kentucky will calculate test participation rates for each school. The goal for test participation rate shall be at least 95% of the total population and of all groups of students. Making or missing the goal will be used in conjunction with the school's AMO. If the school makes its AMO but misses its test participation goal, for the All Students group or any subgroup, then the school will be considered to have missed its AMO. This model was used in the prior No Child Left Behind (NCLB) system and was a leverage point to improve high school graduation rates.

Graduation Rate

Each high school will be provided an annual graduation goal for all students. Making or missing the goal will be used in conjunction with the school's AMO. If the school makes its AMO but misses its graduation goal, then the school will be considered to have missed its AMO. This model was used in the prior NCLB system and was a leverage point to improve high school graduation rates.

A 2011 baseline for each school will be established. The distance from the school's baseline to a 98% goal will be calculated. The school's goal will be to decrease the distance from the baseline to 98 percent for the All Students group. For example, a school with a baseline of 70 has a distance of 38 points to the goal of 98. The school will need to move 2.5 points per year for eleven years to move its score from 70 to 98.

All groups' graduation rates would be publically reported. The table below shows an example:

Graduation Rate: District/School Example

	Baseline	AMO Target	2011-12 Goal	12-13 Goal	13-14 Goal	14-15 Goal	15-16 Goal	…	2022 Goal
All Students	70%	2.5%	72.5%	75.1%	77.6%	80.2%	82.7%	…	98%
White	80%	1.6%	81.6%	83.3%	84.9%	86.5%	88.2%	…	98%
African-American	60%	3.4%	63.5%	66.9%	70.4%	73.8%	77.3%	…	98%
Hispanic	50%	4.3%	54.4%	58.7%	63.1%	67.5%	71.8%	…	98%
Native American	30%	6.1%	36.2%	42.4%	48.5%	54.7%	60.9%	…	98%
Asian	80%	1.6%	81.6%	83.3%	84.9%	86.5%	88.2%	…	98%
With Disability	40%	5.2%	45.3%	50.5%	55.8%	61.1%	66.4%	…	98%
Free/Reduced-Price Meals	60%	3.4%	63.5%	66.9%	70.4%	73.8%	77.3%	…	98%
Limited English Proficiency	70%	2.5%	72.5%	75.1%	77.6%	80.2%	82.7%	…	98%

*Annual target is derived by subtracting the baseline from 98 percent and dividing the result by 11. This allows for lower-performing schools/districts to have different target goals than higher-performing schools/districts. Group size would be at least 25. The table found above shows the yearly goals through 2015-16 to establish the pattern but does not show the goal every year after 2015-16 to get to 2022 due to available space on the page. The intent, however, is for the pattern to continue till the goal of 98% is reached in 2022.

Setting AMO Goals for Each Subgroup

Besides having the AMO goal for each school described in the sections above, it is critical to understand that each year, the Kentucky Board of Education (KBE), though its strategic planning process, will set AMO goals for each subgroup at the state, district and school level. Each subgroup will have an individual AMO, which will be reported annually in the School/District Report Card and will call for an intervention plan to raise the achievement of the subgroup. The KBE Strategic Plan and Annual Targets will provide a reporting system that is parallel to the state accountability system.

Utilizing the single AMO score enables districts and schools to simplify reporting for parents and communities. Simplifying the reporting will help alleviate the confusion caused by the current NCLB reporting. However, Kentucky does not want to lose the focus on raising achievement of subgroups. The Focus School methods (see Section 2E) include the required location of 10 percent of the schools with gap scores and through the consultation process the Third Standard Deviation Model (see Section 2Ei, page 65) was added that will capture any district or school subgroup that performs three standard deviations below the ALL group proficiency average for the state. This

will allow Kentucky to capture more schools in the Focus School category than the 10 percent requirement. Also, this will allow Kentucky to capture high-performing schools that may have one or more subgroups performing significantly below the state average.

In addition, Kentucky has been collaborating with Sir Michael Barber and the Education Delivery Institute to develop delivery plans for college/career readiness, proficiency, closing gaps and teacher/principal effectiveness. Working with schools and districts to assist them in meeting their AMO goals is part of the delivery planning process. For more information on delivery plans and an example of the college/career readiness plan, go to the Appendix, Attachment 17 on page 163.

The delivery plan for closing achievement gaps will set annual targets for reading and mathematics as well as for science, social studies and writing for the state, districts, schools and subgroups based on a model similar to Option A, Section 2B of the ESEA waiver. The subgroup performances at the state, district and school levels will be reported as part of the annual progress toward the goal. The goal shall be reducing by half within five years the percentage of students in each subgroup scoring in the non-proficient category. The annual state report cards will provide this level of detail on progress toward goal. An example of what will be reported is found in the table below.

District/School AMO Example for Groups

	Baseline Proficiency	**AMO Target**	**2011-12 Goal**	**12-13 Goal**	**13-14 Goal**	**14-15 Goal**	**15-16 Goal**
All Students	50%	5	55%	60%	65%	70%	75%
White	50%	5	55%	60%	65%	70%	75%
African-American	34%	6.6%	40.6%	47.2%	53.8%	60.4%	67%
Hispanic	40%	6%	46%	52%	58%	64%	70%
Native American	30%	7%	37%	44%	51%	58%	65%
With Disability	40%	6%	46%	52%	58%	64%	70%
Free/Reduced-Price Meals	20%	8%	28%	36%	44%	52%	60%
Limited English Proficiency	34%	6.6%	40.6%	47.2%	53.8%	60.4%	67%
College/Career	30%	7%	37%	44%	51%	58%	65%
Proficiency Gap	40%	6%	46%	52%	58%	64%	70%
Overall Gap	30%	7%	37%	44%	51%	58%	65%

*Annual target is derived by subtracting baseline from 100 percent and dividing result by 2 and then by 5. This allows for lower-performing schools/districts to have different target goals than higher-performing schools/districts.

+Gap groups must have a minimum of 25 students to be reported; however, all students in any ESEA gap group would be reported in the overall gap group.

Key Questions and Answers

1. What does the state accountability AMO/AYP simulation data look like for a single school?

Example:

District	School	Achievement Score	Gap Score	Growth Score	College or Career Readiness Score	Graduation Rate Score	Overall Score	Percentile Rank on Overall Score	AMO Goal for Year 1
Bullitt County	Bullitt East High School	13.2	6.0	11.5	8.8	15.8	55.3	51	56.8

2. Why choose a normative model?

First, the normative model works extremely well with a continuous improvement model. The goal for all schools is the Overall Score of 100, but the intent of the model is to create incentives for all schools to move toward 100. It also allows for more realistic goals for all schools. The AMO goal is to move one-third of a full standard deviation over a five-year period for the lower-achieving schools. The goals will be seen as achievable because the goals come from Kentucky schools obtaining those scores.

Second, the new Overall Score contains so many data points (achievement, gap, growth, college readiness, graduation rate, Program Reviews and teacher/leader evaluation) that it is difficult to imagine how a criterion-referenced cut score could be obtained. Not only are there many indicators, but each indicator contains multiple data.

3. Why choose one-third of a standard deviation over a five-year period as the goal?

Feedback received from the Council of Chief State School Officers' pre-peer review session group warned that moving a full standard deviation in a five-year period seemed overly ambitious. With this warning in mind, Kentucky Department of Education staff took the ESEA Waiver Request to our Technical Advisory Panel called NTAPPA (the National Technical Advisory Panel on Assessment and Accountability) and its members raised the same concern about the goal. In NTAPAA's experience, the members said they had not seen test results move at this rate. Even though Kentucky's system does have a variety of indicators besides test scores, the majority of the model (70%) comes from assessment results. With the warnings from the informal peer review group and the National Technical Advisory Panel on Assessment and Accountability (NTAPAA), Kentucky ran simulation data from the current testing system to discover the impact of various standard deviation goals. The data simulation shows that the initial selection of 20% annual growth would result in greater than 50% of all schools not making AYP.

A discussion was subsequently held by Kentucky Department of Education leadership staff to determine where an appropriate growth goal could be set. It was decided that the best location would be at the spot where approximately a little over half the schools would make their AMOs. If 50% of the schools could make their AMOs, it would mean the other 50% would have a high

number of schools to use as models and it would illustrate that the goal could be achieved. It also sets a high bar to reach.

Based on the rationale above, Kentucky proposes that the best spot for setting the annual standard deviation goal for improvement would be at .07 for low-scoring schools and .035 for schools scoring above proficient. There is a commitment to conduct ongoing research into all aspects of the model as it evolves and to make changes based on the research results. Kentucky will revisit the AMO goal after the first cycle to determine its feasibility.

4. Is moving one-third of a standard deviation in five years significant?

Yes. If all schools move one-third of a standard deviation in five years, the average of all schools significantly rises and pushes the average score for all schools closer to 100. At the end of five years, the averages and standard deviations are recomputed, and continuous improvement moves forward on the march to the score of 100.

5. Why reset the goal every five years?

A normative model uses relative standing between schools for the initial classification. If a one-year distribution is used, that distribution changes every year, and schools have a moving target that is dependent on how other schools perform. By locking the goal for five years, targets become stable. The performance of other schools does not affect the school/district improvement goal or the ability to reach the goal. By locking the goal for five years the normative model gains criterion features. At the end of five years, the goal is re-set with a new distribution, but once again the goal is locked for another five-year period. This model provides for continuous improvement over time.

6. Why choose the 70th percentile for the proficient line?

The 70th percentile allows approximately one-third of the top-scoring schools to be chosen as Proficient Schools. This cut point sets a high bar of performance. Many stakeholders and the public have previously-formed perceptions of percentiles and their link to grades. The 70th percentile allows them to correlate the scores with traditional grading.

7. In Kentucky's model, what is the difference between Annual Measurable Objective (AMO) and Adequate Yearly Progress (AYP)?

Each school will receive a single AMO goal each year. By making the AMO goal, the school has successfully achieved AYP. AMO and AYP are synonymous terms in the Kentucky model.

8. Will there be a research effort to monitor and evaluate the system?

Yes. Kentucky acknowledges this system is new, and it does not have operational data based on the new assessments and metrics. Over the last 18 months, numerous questions have been discussed. We have run simulation data, and it appears the model will work; however, there are a number of research questions that need to be asked over the next few years. Kentucky will conduct annual reality checks to evaluate how the model is working. The evaluation will allow for constant

monitoring and adjustments to fix procedures or problems that arise. Some of these research questions are listed below.

- Will the new Student Gap Group work as intended to make achievement of all students a top priority?
- Will the combination of many metrics into one single Overall Score work as intended?
- Is the goal of growing .07 of a standard deviation each year too easy, too hard or at the right spot?
- Does the normative model provide the incentives to increase student achievement?

9. *What is the percentage of All Students scoring Proficient or Higher on the latest Kentucky Core Content Test?*

Percent Proficient or Higher, Kentucky Core Content Test, Spring 2011

Grade	Reading	Mathematics	Science	Social Studies	Writing
03	80.53	77.69			
04	73.50	74.74	70.53		
05	74.08	65.92		59.76	59.74
06	71.58	69.84			
07	66.78	65.61	64.04		
08	71.36	59.74		60.09	45.22
10	65.90				
11		45.97	41.37	41.49	
12					39.87

Percents on the new Kentucky tests administered in the spring of 2012 are expected to change due to the alignment to the new Core Content and college readiness standards.

10. *Are schools in the Needs Improvement category distinguishable from each other?*

Kentucky's model keys on a percentile score being assigned to each school and district. Even though 69% of the schools will fall in the Needs Improvement category, at least for the first year, the percentile score attached to the school will clearly label schools along the continuum of the first percentile to the sixty-ninth percentile. The Needs Improvement category, by virtue of the percentile score, does make all schools distinguishable within that label.

2.C REWARD SCHOOLS

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

Guidance Question: Did the SEA describe its methodology for identifying the highest-performing and high-progress schools as reward schools?

There will be two types of Reward Schools: Highest-Performing and High-Progress.

Highest-Performing Schools

Within the category of Highest-Performing Schools, there will be two levels of schools: Highest-Performing with High Distinction and Highest-Performing.

- Kentucky Schools or Districts of Distinction will include Kentucky's Highest-Performing Schools or Districts that score at the 95th percentile or higher on the Overall Score.
- Kentucky Highest-Performing Schools or Districts will include schools/districts scoring at the 90th percentile or higher.

Schools will not qualify as Highest-Performing if they have been identified as Kentucky Priority or Kentucky Focus Schools.

Method for Highest-Performing Schools - Both categories will be calculated using the Overall Score by level. The Overall Score will be ranked annually from low to high. By level, the scores will be computed to determine both the Schools of Distinction and the Highest-Performing Schools for that year per the criteria cited above.

High-Progress Schools

Schools showing the highest progress will be labeled High-Progress Schools. High-Progress Schools will begin to be identified in Year 2 of the model in order to have two years of data to show improvement.

Method for High-Progress Schools - The Overall Score from Year 1 will be compared to the Overall Score of Year 2. The difference between those two scores will then be rank-ordered from top to bottom. Title I schools in the top 10 percent will be called High-Progress Schools. The top 10 percent of non-Title I schools also will be identified.

Priority and Focus Schools may be identified as High-Progress if they meet the eligibility requirements.

AMO and Graduation Rate Requirement for Highest-Performing and High-Progress Schools

Additionally, Highest-Performing and High-Progress Schools must meet their current-year AMO/AYP goal, and each high school's graduation goal must be above 60 percent for the prior two years.

Progressing Category

In addition, any school that meets its annual AMO/AYP goal will also be called a Progressing School. Progressing labels will be applied starting in the second year of the model because the calculation is dependent on two years' worth of data.

Needs Improvement Category

The Needs Improvement category includes all schools below the Proficient line that do not meet AMO/AYP goals.

2.C.ii Provide the SEA's list of reward schools in Table 2. **(See Attachment 9, page 80 of the Appendix)**.

2.C.iii Describe how the SEA will publicly recognize and, if possible, reward highest-performing and high-progress schools.

Guidance Question: Did the SEA describe how the SEA will publicly recognize, and if possible, reward highest performing and high-progress schools?

703 KAR 5:225, School and District Accountability, Recognition, Support and Consequences is the regulation that describes the rewards or recognition schools and districts are eligible to receive. It was originally approved by the Kentucky Board of Education in August 2011 as 703 KAR 5:222, Categories for Recognition, Support and Consequences; however, it underwent revisions to align the regulation with the ESEA waiver requirements and secure additional constituent review and came back to the board in February 2012 for approval. Then, due to technical issues found in the regulation when it was filed with the Legislative Research Commission, the number and name of 703 KAR 5:222 was changed to 703 KAR 5:225, School and District Accountability, Recognition, Support and Consequences, and another public hearing was held that resulted in further changes to the regulatory language. The board approved those changes in June 2012.

The elements for rewards and recognition will be as follows:

> "Each recognized school or district shall be authorized to use a KDE-approved web logo and other promotional materials as may be designated by KDE reflecting the category of recognition earned. Subject to availability of funds, financial rewards may be used in conjunction with other recognition activities, including funding for special professional growth opportunities or support to enable recognized schools or districts to partner with and mentor a lower-performing school or district. Kentucky Highest-Performing Schools and Districts of Distinction shall receive special recognition as determined by the Commissioner."

The Kentucky Department of Education has received substantial input from stakeholders into the design of the recognition and rewards processes outlined in the regulation. Throughout the developmental process, educators, administrators and other stakeholders were specifically asked to consider the question of how the rewards could be the most meaningful for schools and districts, and they were asked to provide their suggestions for rewards and recognition to be included in the regulation. Considerable discussion ensued around whether the rewards section of the regulation should be more or less specific. The original version of the regulation included a reference to specific types/colors of flags that would be provided to schools at different recognition points. After discussion, it was determined that stakeholders preferred a less specific

and more general approach, which would allow sufficient flexibility to adjust the rewards as additional ideas came forward from the field.

As Kentucky moves forward with implementation of the recognition and rewards processes outlined in the accountability regulation, staff will continue to collect and analyze data and obtain the input of teachers, principals, administrators and other stakeholders to assess the relative effectiveness of various types of recognition and rewards practices. The Kentucky Department of Education will continue to work with stakeholders to develop and refine rewards and recognition practices that will be meaningful to staff, while also identifying, magnifying and incentivizing the desired results.

Key Questions and Answers

1. *Does the list of reward schools align with the definition of these schools provided in the ESEA Flexibility Document?*

In order to find Reward Schools, the Overall Score is used. The Overall Score uses some indicators outside the traditional achievement area. For instance, gap scores, individual growth, college/career readiness and graduation rate play a role in the Overall Score. When simulations for Kentucky's Reward Schools (Highest Performing Schools and High Progress Schools) were run, the following results were obtained:

	All School Levels				Title I School Levels				Non-Title I School Levels			
	El	MS	High	All	El	MS	High	All	El	MS	High	All
Number of Schools	712	320	224	1256	639	227	60	926	73	93	164	330
Number of Highest Performing Schools	70	30	19	119	54	24	2	80	16	6	17	39
Number of High Progress Schools	73	33	23	129	65	22	8	95	8	11	15	34

*Based on simulated data

For Highest Performing Schools, Kentucky has set the 90th percentile as the cut score to be considered for this category. In order to be fair to all schools, the cut score would be applied to all schools regardless of their Title I or Non-Title I status. If a Title I school falls at or higher than the 90th percentile on the Overall Score, it would be labeled appropriately.

When simulations for Reward Schools with <u>only achievement</u> versus the new Overall Score were run, the following results were obtained:

Levels	Schools by Achievement Only	Schools by Overall Score	Identical Matches	Percent Matches
Elementary	74	78	45	57.7
Middle	33	34	23	67.6
High	24	24	17	70.8
Combined	131	136	85	62.5

*Based on simulated data

Kentucky Department of Education staff is comfortable that the data identified schools appropriately. We expect a different distribution of schools to be identified when all categories of the system are included; however, the percentages in the table above show that achievement still plays a crucial role in the system.

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.

Guidance Question: Did the SEA describe its 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?

Kentucky Priority Schools will include all the schools identified as persistently low-achieving (PLA), as defined by Kentucky Revised Statute 160.346.

Districts that have an Overall Score in the bottom 5 percent for all districts that have failed to make AYP for the last three consecutive years shall be Priority Districts. (2.D.iii.c)

2.D.ii Provide the SEA's list of priority schools in Table 2. **(See Attachment 9 on page 80 of the Appendix.)**

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

Guidance Question: Are the interventions that the SEA described aligned with the turnaround principles and are they likely to result in dramatic, systemic change in Priority Schools?

Priority Schools

Since Priority Schools are defined as those schools already identified as persistently low-achieving (PLA) by state statute, those schools have or will already receive supports and consequences as required by KRS 160.346 (http://www.lrc.ky.gov/KRS/160-00/346.PDF) and 703 KAR 5:180 (http://www.lrc.ky.gov/kar/703/005/180.htm). Among those requirements is the necessity to choose one of the four school intervention options-- external management, restaffing (turnaround), school closure or transformation. Each of those options contains the relevant elements of the turnaround principles included in the 1003(g) School Improvement Grant guidance. Included among those elements is removal of the current school leadership unless the commissioner determines otherwise based on findings in the required formal review process. (2.D.iii.a)

Kentucky has an extensive, successful and highly regarded process by which it identifies and

intervenes in Priority Schools and Districts. Upon identification as a Priority School through the assessment scores, the school and its district are required to undergo a formal review process to determine whether the leadership of the school/district has the capacity to lead the intervention process. As Kentucky's method of school governance includes a school-based decision making council, a determination is also made as to whether the council has the capacity to continue in its governance role or whether its authority should be delegated elsewhere. This examination of school governance to evaluate effectiveness in accelerating student learning is an innovative component of the model.

The intervention process is managed through the Kentucky Department of Education's (KDE's) Office of District 180. The office has established three Centers for Learning Excellence, which are staffed with Education Recovery staff that are highly trained and have extensive experience in turnarounds of low-achieving schools. The centers are affiliated with regional universities in the eastern, western and central parts of the state, which allow them to access university faculty and educational cooperative staff that serve those areas. Priority Schools are assigned to the supervision of a center, which is managed by an Education Recovery Director responsible for the oversight of all identified schools and districts in the geographic area. Each school is assigned an Education Recovery Leader, who becomes the lead administrator working with the principal to implement the recovery. Education Recovery Specialists are hired to work specifically with teachers to assist them in building the skills and capacities to dramatically improve student achievement.

The Education Recovery staff begins by putting in place a number of strategies to assure that interventions are begun as quickly as possible. Once the application for School Improvement Grant funds has been approved, training begins immediately with the provision of professional development on the turnaround process for all school personnel. Recovery staff facilitates a short term, 30-60-90-day planning process to determine and prioritize activities that must be accomplished immediately. While this is taking place, capacity building begins with targeted professional development based on needs identified from the formal review process. Teacher Turnaround Teams are formed by content area, with university faculty, experienced consultants from educational cooperatives, staff from the district central office, Education Recovery staff and KDE staff designing and delivering professional development and working with the Teacher Turnaround Teams. The teams work on problems of practice and methods for facilitating successful professional learning communities.

One of the factors contributing to the success of the District 180 Education Recovery process is that it provides a consistent, proven framework for allocating human capital and fiscal resources to troubled schools, while allowing maximum flexibility for the intervention staff to personalize the methodologies based on the needs of the school, continually revisit and update their data and on that basis, immediately revise or abandon practices failing to generate the desired results.

In addition to the immediate interventions outlined above, Priority Schools make additional, longer-term plans through the Comprehensive School Improvement Plan (CSIP) process. In working through this planning process, the district will assist the school in using a variety of relevant sources, including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for revisions to the CSIP. The school also must

document meaningful family and community involvement in selecting the intervention strategies that will be included in the revised CSIP.

The school's CSIP is required to include the support that the district will provide throughout this process. KDE's commitment to building district capacity is essential for the meeting of desired outcomes in these schools.

Consistent with requirements for all schools in each support category, the CSIP of a Priority School must contain a number of common elements:

- curriculum alignment to ensure the instructional program is rigorous, research-based, based on student needs and aligned with the Common Core Standards
- provision of time for collaboration on the use of data to inform assessment strategies, monitor and modify instruction, and support proficient student work
- professional development to address the goals of the plan
- parental and community communication and engagement
- attendance improvement and dropout prevention
- activities to target the underperforming areas in achievement, gap, growth, college/career readiness and gap.
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation measures
- school safety, discipline and non-academic factors such as student social, emotional and health needs
- design of the school day/week/year to maximize teacher collaboration and student learning time
- technical assistance that will be accessed

If identified for a second time, the superintendent and school-based decision making council shall review, revise (in accordance with 704 KAR 5:225, Section 9) and agree upon the CSIP, which will be posted to the school's website. If identified for the third or more consecutive time, in addition to the requirements in the sentence above, the CSIP shall be electronically submitted to the KDE and the school must:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by KDE, accept the assignment of a mentor/partner
- accept ongoing resources throughout the year as assigned or approved by KDE

<u>Priority Districts</u>

The district also will be required to revise its Comprehensive District Improvement Plan (CDIP) using a variety of relevant sources including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for the revisions. The CDIP will be posted to the district's website, include the support to be provided to the school(s) and address the following:

- curriculum alignment within the schools, assuring there is alignment with the common core standards

- evaluation and assessment strategies to continuously monitor and modify instruction to meet student needs and support proficient student work
- professional development to address the goals of the plan
- parental and community communication and engagement
- attendance improvement and dropout prevention strategies
- activities to target the underperforming areas in achievement, gap, growth, college/career readiness and gap
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation measures
- technical assistance that will be accessed

The district's CDIP is required to include the support that the district will provide throughout this process.

If identified for a second time, in addition to the items described above, the CDIP will be reviewed, revised and posted on the district's website. If identified for the third or more consecutive time, in addition to the requirements in the previous sentence, the district must:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by the KDE, accept the assignment of a mentor/partner
- accept ongoing resources throughout the year as assigned or approved by KDE

KDE will monitor implementation of the plan and provide guidance based on progress reports, data reviews and on-site observations.

Schools and districts will be provided with examples of interventions that they may wish to choose from to address the required components in the CSIP/CDIP. Some examples of the required CSIP/CDIP components and suggested interventions are:

1. **Redesigning the school month, day or year to include additional time for student learning and teacher collaboration:**
    - This may include adding time to the school day, adding days to the school year, changing the master schedule to look for additional time, changing the school calendar to provide additional time, reducing transition time to classes, reviewing the school schedule to look for additional sources of time that might be found.

2. **Using data for continuous improvement in teaching and learning:**
    - Must at a minimum provide time for collaboration on the use of data; use professional learning communities to review specific data; review a multiplicity of types of data to examine the impact of each on student achievement (teacher and student attendance, truancy, student discipline infractions, positive behavior interventions); provide faculty-wide input to determine data interests/needs; provide for faculty-wide review of data to determine areas needing further professional development; examine formative or interim assessments for the purpose of improving instruction; and disaggregate data by subgroups to assist in

determining appropriate targeted interventions.

3. **Ongoing mechanisms for family and community engagement:**
    - Establish organized parent groups; hold public meetings to review school performance and assist with developing the CSIP; use parent, teacher and student surveys to determine areas of strength and weakness; continue use of Family Resource/Youth Services Centers (FRYSCs) and other local support providers to help meet student and family needs; continue to use the School-Based Decision Making (SBDM) process for engaging parents in the activities of the school; work with adult education providers to offer parent education classes; and collaborate with parent groups representing students with disabilities, students with Limited English Proficiency and other gap groups to receive their input and ascertain the needs for individual students.

4. **Establishing a school environment that improves safety and discipline and addressing other non-academic factors that impact student achievement such as students' social, emotional and health needs:**
    - Hiring a school resource officer; initiating programs such as a Positive Behavior Intervention System or other systems designed to limit negative student behaviors; introducing a school-wide anti-bullying program; receiving an audit from the Center for School Safety and implementing the recommendations from it; beginning collection and analysis of data on a number of the non-academic factors that impact student achievement; using information from the Kentucky System of Interventions to address school environment concerns; and continuing use of the FRYSCs and other local providers to help meet broader student and family needs.

The implementation of the variety of practices to be implemented to address the needs of Priority Schools and Districts will increase the quality of instruction to all students, improve the effectiveness of leadership and teaching in those schools, decrease achievement gaps and improve student achievement for all groups of students. (2.D.iii.b)

<u>Practices to Improve Student Achievement for English Language Learners, Students with Disabilities and Lowest-Achieving Students and Graduation Rates for All Students</u>

In keeping with the belief that "all children **can** learn, and each child **will** learn", Kentucky has intentionally embedded the activities and strategies to address the needs of students with disabilities and English language learners into the Unbridled Learning: College- and Career-Ready for All agenda, and has sought to ensure the needs of those students are included throughout all aspects of the work to increase student achievement. Students with disabilities and English language learners are included in the performance data used to identify schools and implement interventions, and are included in both the proficiency and gap reduction components of the accountability system index. They have been included in regular school and district improvement processes in order to ensure they receive the same level of attention through the same planning processes as the rest of the school. This promotes the concept of inclusion and ensures the integration of strategies and activities that may be beneficial to all students.

In the accountability process, the formal review in the District 180 Education Recovery process identifies areas of strength and weakness relative to the instructional needs of these students and other students in the gap, and the planning process for Priority Schools and Districts is the method used to address those needs. Kentucky's Achievement Gap and Proficiency Delivery Plans (Attachments 29 and 30 on pages 317 and 324 respectively of the Appendix) provide additional methods to assure the success of these students, in addition to the strategies and activities that will be identified through the Education Recovery process.

Some of the strategies included in the Gap Plan include the use of the electronic ASSIST tool to guide the planning process for strategies and activities to be used with students in subgroups. The tool will be used to consolidate and increase the likelihood of implementation fidelity through data goals and frequent monitoring of the plan. Specific questions to address the instructional needs of students in the gap subgroups will be asked and additional data on these groups will be collected to ensure their inclusion in the school's planning process. Based on the needs identified through the data collection, the Kentucky Department of Education will assist local school districts to ensure that professional development will be identified and delivered including training on different collaboration models to support students with disabilities and training on how to implement differentiated instructional strategies that will reach these students. Education Recovery staff will receive specific training on strategies for closing the gaps, which will include measures to address these two groups of students. Their experience and expertise will be used as a resource to assist staff working with other schools who are struggling to find "what works" to reach students in the gap.

The *"Guidelines for Closing the Gap for All Students"*, a stakeholder-developed guidance document to help schools and districts that are looking for additional methods to approach gap closure will be published and widely distributed, and training will be offered. Because of the intensive stakeholder guidance in developing this document, it reflects suggestions for ensuring community engagement in the process of identifying and addressing gap issues. A summer progression plan will be promoted including the "find a book" website involving a partnership with the Council of Chief State School Officers (CCSSO) and Metametrics.

Other activities that will be implemented include:

- development of an Alternative Individual Learning Plan for students in alternative schools that hold both the sending and receiving schools accountable for their academic progress (many students served in these schools fall into one of these categories);
- providing assistance and support to districts in assuring additional digital learning environments and opportunities designed to engage disenfranchised students;
- development of individual profile sheets in reading and mathematics to monitor the success of students with disabilities and English language learners;
- implementation of the Kentucky System of Intervention (KSI) (Kentucky's Response to Intervention, RtI process), which provides individual identification of student needs and responses tailored to address their learning issues; and
- Monitoring through the ASSIST tool to increase the likelihood of implementation with fidelity.

Additional strategies are included in the Achievement Gap Delivery Plan that can be found as Attachment 29 on page 317 of the Appendix.

The additional flexibility that the waiver provides will allow districts to target federal funds to target achievement gap subgroups.

Strategies to address graduation rates for all groups of students are included in the Kentucky Department of Education College and Career Readiness Delivery Plan (Attachment 17 on page 163 of the Appendix).

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.

Guidance Question: Is the SEA's proposed timeline for ensuring that LEAs that have one or more Priority Schools implement meaningful interventions aligned with the turnaround principles in each Priority School no later than the 2014-15 school year reasonable and likely to result in implementation of the interventions in these schools?

Kentucky has identified as Priority Schools those previously identified as persistently lowest-achieving Schools (PLAs) using the 2009, 2010 and 2011 assessment data. The Priority Schools, due to their previous identification as PLAS, have already been implementing interventions required through School Improvement Grants (SIGs), which are aligned with the turnaround principles. Since the Priority Schools are identified by the state statute defining PLAs (KRS 160.346), the Kentucky Department of Education (KDE) has already begun the process to implement meaningful interventions in schools identified with 2009 and 2010 assessment data and will begin over the next few months to provide the same interventions with those identified with 2011 assessment data. KDE will implement the additional requirements of this waiver request upon U.S. Department of Education approval. The rationale behind the choice of these implementation timelines is to assure that intervention processes to benefit students are put in place as soon as possible.

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.

Guidance Question: Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement exits priority status?
In order to exit the Priority status, the school or district must meet AMO/AYP goals for three consecutive years and must no longer be identified by the applicable percent calculation of being in the lowest 5 percent. This exit goal is the reverse of the calculation that moved the school into the Priority category. By meeting the AMO as described in section 2.D.i. above, the school has made a gain of 21 percent of the standard deviation goal. By moving that far in a three-year period, the school has shown it has made progress and is improving. In addition,

the school needs to score at or above a 70 percent graduation rate for three years in a row. (2.D.iii.c.)

The process is designed to provide a trajectory of continuous improvement for all schools and districts; thus, schools and districts exit their current rewards and consequences status and enter another category when they no longer meet the eligibility criteria for the original category.

Key Questions and Answers

1. *Does the list of priority schools align with the definition of these schools provided in the ESEA Flexibility Document?*

Kentucky chose the Waiver option of using the currently identified Persistently Low-Achieving (PLA) Schools as the new Priority Schools. Forty-one PLA/Priority Schools have been identified, are receiving services, and have made the choice to use one of four turnaround models. Since the PLA list is being used for the new Priority School list, the identification for this group of schools is identical in both the older NCLB model and the new Kentucky model. PLA Schools were identified by student achievement on Kentucky's previous summative assessment, the Kentucky Core Content Test, in reading and mathematics; graduation rate; and Title I status. The final numbers match the current School Improvement Grant (SIG) requirements and meet the Waiver option of using the state's current SIG schools for Priority Schools.

Priority Schools	Total Number of Schools	Title I Schools	Non-Title I Schools
Total number of schools	1148	818	330
Total number of priority schools required to be identified	n/a	41	n/a
Total number of schools on list generated based on overall rating that are currently-served Tier I or Tier II SIG schools	41	24	17
Total number of schools on list generated based on overall rating that are Title I-eligible or Title I-participating high schools with a graduation rate less than 60 percent over a number of years	4	3	1
Total number of schools on list generated based on overall rating that are among the lowest-achieving five percent of Title I schools	30	20	10

*Based on 2011 NCLB Data

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."

Guidance Question: Did the SEA describe its 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?

Focus Schools:

The student gap group score, described in Section 2A, will be used to determine the Focus Schools. There will be three ways to become a Focus School:

(1) The Student Gap Group Score will be ranked for all schools in the state. The schools in the lowest 10 percent of the student group gap scores by level will be called Focus Schools. The list will identify the lowest 10 percent of all schools in the state. All schools, both Title I and non-Title I, can be Focus Schools. (If necessary, the list would be increased until at least 10 percent of the Title I schools are included as Focus Schools.)

OR

(2) Kentucky recognizes the importance of individual gap groups; therefore, individual group data is not lost in the model. All schools with individual gap groups underperforming in the third standard deviation below the mean (called Third Standard Deviation Model) will be called Focus Schools. The calculation is done by comparing each individual gap group to the average of all students in the state. In practical terms, this calculation can be considered an AMO goal for each subgroup in a school.

OR

(3) Any high school with a graduation rate below 60 percent for two years in a row will be a Focus School.

Method for Calculating Focus Schools: Third Standard Deviation Model

By level, (elementary, middle and high), the state average for proficient/distinguished in each subject area (reading, mathematics, science, social studies and writing) will be computed. In addition, a standard deviation by subject area for all students will be computed. For each subject area, the third standard deviation below the mean of all students will be the cut score to determine if an individual subgroup becomes a Focus Group. If an individual subgroup by level and subject falls below the third standard deviation cut score, that subgroup will place the school into the Focus School category. Across the level, the subgroup needs at least 25 students.

Focus Districts:

Districts that have a Student Achievement Gap Group Score in the bottom 10 percent of Student Gap Group Scores for all districts will be identified as Focus Districts.

Key Questions and Answers

1. *Has Kentucky gone beyond the minimum requirements for Focus Schools?*

Yes. By adding a Third Standard Deviation Model, there is, in practicality, another AMO goal around individual gap groups. The Third Standard Deviation Model allows Kentucky to locate individual subgroups across all schools in each subject area that need to be targeted for improvement. When reporting scores to the public, Kentucky will list the individual subgroups

that triggered the school to be placed into the Focus Schools category as well as show the performance for all subgroups in the school.

2. Does the model catch low-performing subgroups in high-performing schools?

Yes. A Third Standard Deviation Model calls for locating individual underperforming subgroups in all schools. The Third Standard Deviation Model looks for individual subgroups that are underperforming compared to the average of the "all" students group by at least three standard deviations. This means any individual subgroup in any high-, middle- or low-performing school may be targeted as a Focus School for interventions. In simulations run with current Kentucky assessment data, 364 of all schools would be listed as Focus Schools due to the Third Standard Deviation Model.

2.E.ii Provide the SEA's list of focus schools in Table 2. **(See Attachment 9, page 80 of the Appendix.)**

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.

Guidance Question: Did the SEA describe the process and timeline it will use to ensure that each LEA identifies the needs of its Focus Schools and their students and provide examples of and justifications for the interventions the SEA will require its Focus Schools to implement to improve the performance of students who are furthest behind?

<u>Overview of Determining Focus School Needs</u>

Kentucky's accountability system will ensure that school districts identify the specific needs of their Focus Schools and their students, and furthermore, that they will take appropriate steps to intervene to improve the performance of students who are the farthest behind.

A central tenet of Kentucky's support and monitoring activities for all of its schools and districts centers on the Comprehensive School/District Improvement Planning process. Comprehensive School/District Improvement Plans (CS/DIP) are developed through a process that is described in greater detail in 2.F., Incentives and Supports for Other Title I Schools. The Improvement Plans for Focus and Priority Schools/Districts differ from those required of the remainder of Kentucky's schools/districts, in that they require the plans to include additional requirements (outlined specifically below) related to their gap issues and to address how they will address these additional requirements.

To ensure the local education agency (LEA) is involved in identifying the needs of its Focus Schools, and ensuring that it implements appropriate, timely and effective interventions, Kentucky requires activities of both the Focus School and its district. The district is required to assist the school throughout the needs assessment process using data from a variety of sources

and to work with the school throughout the development of the plan. The Kentucky Department of Education (KDE) regularly convenes a statewide Raising Achievement/Closing Gaps Council that has developed a guidance document that schools and districts must use to inform the direction of their plans, and the council remains available to provide additional, evolving resources in this area as these develop.

As a result of this collaborative effort, the school's plan will include the support to be provided by the district, and the district will review the completed plan to assure that the resources to implement the plan are available. Plans are to be posted on the school's website to ensure widespread dissemination and promote transparency throughout the process.

The extensive education recovery work of the Office of District 180 with Priority Schools will provide research-based interventions and resources that may be accessed by Focus Schools and Districts based on the needs identified through the planning process. As a part of the monitoring process, the plans of Focus Schools will be monitored by cross-functional teams of KDE staff who will review submissions, assess levels of implementation and recommend new or revised interventions as needed.

The framework requires the early and continued involvement of LEAs in working with their Focus Schools. LEAs are expected to be primarily responsible for the compliance of their schools, with additional, more intensive oversight by KDE coming into play when and if the strategies outlined in the comprehensive plan do not appear to be achieving sufficient gap closure to allow the school to exit from the Focus category within a two-year timeline.

Process – Focus Schools

The initial step in the accountability process is notification by the commissioner of education of a school's status as a Focus School. Within 90 days, each identified Focus School must review and revise their Comprehensive School Improvement Plan (CSIP) and post it on the appropriate website. The revisions require the use of a variety of relevant sources, including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for the revisions. The needs assessment and the revised plan will be informed by guidance from the Commissioner's Raising Achievement/Closing Gaps Council (CRACGC).

CSIPs for Focus Schools must contain:

- curriculum alignment to ensure the instructional program is rigorous, research-based, based on student needs and aligned with the Common Core Standards
- provision of time for collaboration on the use of data to inform assessment strategies, monitor and modify instruction, and support proficient student work
- specific strategies to address the within-school gaps in achievement and/or graduation rates between the highest-achieving subgroup and the lowest-achieving subgroup
- professional development on the goals of the plan
- parent and community engagement
- attendance improvement/dropout prevention strategies
- activities to target the underperforming areas in achievement, gap, growth,

college/career readiness and gap
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation
- school safety, discipline and non-academic factors such as student social, emotional and health needs
- design of the school day to maximize learning time
- technical assistance that will be accessed

If Focus Schools remain in that category for three consecutive years, they must revise the CSIP as specified in Section 9 of 703 KAR 5:225 within 90 days of receiving notice from the Commissioner of Education of their status. The superintendent and the council must review, revise and agree upon the CSIP, which will then be posted on the school's website. If this occurs for a fourth consecutive year, they must follow the same process described in the previous sentence, and electronically transmit the CSIP to KDE within ninety (90) days of receiving notice from the Commissioner of Education. The CSIP will also be posted on the school's website and these additional requirements will apply:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by the KDE, accept the assignment of a mentor/partner
- accept ongoing resources through the year as assigned or approved by KDE

Process – Focus Districts

The initial step in the accountability process is notification by the commissioner of education of district's status as a Focus District. Within 90 days, each identified Focus District must review and revise their CDIP and post it on the appropriate website. The revisions require the use of a variety of relevant sources, including a valid and reliable measure of teaching and learning conditions to inform the needs assessment that forms the basis for the revisions. The needs assessment and the revised plan will be informed by guidance from CRACGC. The CDIP will be posted to the district website, include the support to be provided to the school(s), and address the following:

- curriculum alignment within the schools; assuring there is alignment with the Common Core Academic standards
- evaluation and assessment strategies to continuously monitor and modify instruction to meet student needs and support proficient student work
- specific strategies to address gaps in achievement and graduation rates between the highest-achieving student performance group and the lowest-achieving student performance group(s)
- professional development to address the goals of the plan
- parental and community communication and engagement
- attendance improvement and dropout prevention
- activities to target the underperforming areas in achievement, gap, growth, college/career readiness and gap
- activities to target weaknesses in Program Reviews
- activities to target areas of need identified through teacher and leader evaluation measures

- technical assistance that will be accessed

The district's CDIP is required to include the support that the district will provide throughout this process.

If Focus Districts remain in that category for three consecutive years, they must revise the CDIP as specified in Section 9 of 703 KAR 5:225 within 90 days of receiving notice from the Commissioner of Education of their status and post it on the district website. If this occurs for a fourth consecutive year, they must, in addition to the requirements in the previous sentence:

- participate in a set of improvement strategies resulting from an accreditation process
- if directed by the KDE, accept the assignment of a mentor/partner
- accept ongoing resources through the year as assigned or approved by KDE

Timelines

Kentucky will provide a tentative identification of Focus Schools/Districts based on the results from the 2010 and 2011 assessment scores. Full implementation of the model will occur with the identification of schools following the administration of the 2011-12 assessment.

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.

Guidance Question: Did the SEA provide criteria to determine when a school that is making significant progress in improving student achievement and narrowing achievement gaps exits focus status?

Focus Schools - 10% Model: In order to exit the Focus Schools category in the 10 percent model, the student gap group would need to be above the lowest 10 percent category, show improvement and meet AMO/AYP for two years in a row. By moving the groups out of the lowest-performing gap groups, the school has demonstrated an intentional focus on and success with improving the achievement of the gap group students.

Focus Schools – Third Standard Deviation Model: In order to exit the Focus Schools category in the Third Standard Deviation model, the individual subgroup that triggered the school's placement in the category would need to rise above the third standard deviation cut score and show improvement. Additionally, the school would need to meet AMO/AYP for two years in a row.

Focus Schools – Graduation Rate: If the school is a Focus School due to graduation rate, the school must have a graduation rate higher than 70 percent and meet AYP for two years in a row to exit this status.

Focus Districts also would need to be above the lowest 10 percent category to exit this status.

Key Questions and Answers

1. *Does the list of Focus Schools align with the definition of these schools provided in the ESEA Flexibility Document?*

Kentucky's Focus School identification method, due to the 10% rule, the third standard deviation model, and the graduation rate, locates a number of schools beyond the requirements of the Waiver definitions. All schools would be provided services for improvements, but the lowest scoring Title I schools would receive priority. See the chart below.

	All School Levels				Title I School Levels				Non-Title I School Levels			
	EL	MS	HS	All Levels	EL	MS	HS	All Levels	EL	MS	HS	All Levels
Number of Schools	712	320	224	1256	639	227	60	926	73	93	164	330
Total Focus Schools	214	125	70	409	192	72	14	278	22	53	56	131
Graduation Rate < 60 (Not Priority School)			0	0			0	0			0	0
Graduation Rate < 60 (Priority School Not Identified as Focus)			4	4			3	3			1	1
Bottom 10 %	114	31	20	165	107	25	11	143	7	6	9	22
3 Standard Deviations	168	112	59	339	147	60	5	212	21	52	54	127

*Based on Simulated data

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 SCHOOLS -- SEE ATTACHMENT 9, PAGE 80 OF THE APPENDIX FOR KENTUCKY'S LIST OF SCHOOLS.

Requested Totals for Table 2 – All Schools and Title I Schools

Level	Number of Schools	Title I Schools	All Schools - Reward	Title I Schools - Reward	All Schools - Priority	All Schools - Focus	Title I Schools - Focus	Title I Schools w/Graduation Rate <60%
Elementary	712	639	125	103	0	214	192	n/a
Middle	320	227	56	40	9	125	72	n/a
High	224	60	34	9	32	70	14	3
All Levels	1,256	926	215	152	41	409	278	3

2.F PROVIDE INCENTIVES AND SUPPORTS FOR OTHER TITLE 1 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.

Guidance Question: Does the SEA's differentiated recognition, accountability, and support system provide incentives and supports for 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? Are those incentives and supports likely to improve student achievement, close achievement gaps, and increase the quality of instruction for students?

Kentucky's accountability system is designed to identify and support those schools and districts that are struggling, reward those schools/districts that have proven their ability to improve student achievement and provide support for both Title I and non-Title I schools that are not identified in either category.

As mentioned earlier, Kentucky's support and monitoring activities for all schools and districts center around the development, revision and monitoring of the Comprehensive School Improvement Plan (CSIP) or Comprehensive District Improvement Plan (CDIP). Schools that have been identified as Focus or Priority Schools/Districts have specific process and content requirements for development of the CSIP/CDIP relative to their status. All other schools and districts are required to complete a plan, but the requirements are not as prescriptive as those for the Focus Schools and Districts.

To explain in more detail, the CSIP/CDIP process requires a needs assessment to be completed that includes parents, students and community involvement in the development process. Committees analyze data related to the Standards and Indicators for School Improvement, which are also the basis for the current Leadership Assessment process used to identify School Improvement Grant (SIG) schools. (See the following link for the Standards and Indicators for School Improvement: http://www.education.ky.gov/KDE/Administrative+Resources/School+Improvement/Standards+and+Indicators+for+School+Improvement.)

The committees use the data to determine the school's or district's needs. That data is synthesized into causes and contributing factors, translated into needs and then prioritized. Goals, objectives, strategies and activities are developed to address the priority needs. The strategies and activities to address the goals must be research-based, proven to be effective or noted as instructional best practices. Each strategy receives a person responsible, timeline and funding source. The process requires a review of the previous year's plan to evaluate its effectiveness, which is used to inform the development process for the new plan and includes a plan for ongoing public communication.

In an attempt to decrease the time and paperwork burden on local schools and districts, Kentucky decided to work with a vendor to provide an automated process for development and submission of the plans. The selected vendor chosen as a partner in this venture is AdvancEd, which administers the Southern Association of Colleges and Schools (SACS) accreditation and is recognized across the world as the leading organization for school and district improvement and accreditation. The transition process will be occurring over the next few years as Kentucky moves from an on-site, paper-based leadership assessment process based on the Standards and Indicators for School Improvement to a new on-site, electronic diagnostic review process based on the AdvancEd standards. The use of the AdvancEd process will reduce cost and eliminate duplication and unnecessary paperwork as it includes statewide electronic systems for school and district planning and monitoring.

Through the use of AdvancEd's ASSIST (Adaptive System of School Improvement Support Tools) the Kentucky Department of Education (KDE) intends to reduce the number of plans required of schools and districts, better align the state's data collection and practices with those of the U.S. Department of Education and ensure the use of a more comprehensive plan allowing districts to track resources used and results realized from implementation of electronic plans. It will provide schools and districts with a template for their plans, the ability to upload additional compliance data and a method for monitoring completion of school and district strategies in the plan.

Connecting Title I schools to the ASSIST process provides a support and intervention component, as the system requires a data analysis process that will lead to identification of the root causes leading to low student performance among subgroups. This will enable schools to create a strategic plan that directly addresses the root causes and to effectively monitor implementation and the impact of the plan.

An additional benefit of this collaboration is the development of an electronic state education agency monitoring process that will flow from the school and district planning processes. The online tools allow school districts to upload a number of compliance documents, send them electronically to KDE and receive feedback. It provides the state education agency a centralized location for all monitoring documents and activities, and it is anticipated that ASSIST will reduce or eliminate some monitoring activities that had in the past been performed on-site.

To further assist KDE in supporting these schools and districts, cross-functional teams with representation from all areas of the agency will be assigned to review the submissions from all school districts and assess weaknesses that could become obstacles to successful completion of the plans. The teams will assess levels of implementation and recommend appropriate and targeted interventions specifically designed to address the identified concerns.

In order to incentivize schools that are not making progress in improving student achievement and closing achievement gaps, Kentucky has included in its accountability system a provision that, beginning in 2013, will deny rewards and recognition to any otherwise-eligible school that fails to meet its AMO target.

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.

Guidance Question: Is 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, likely to succeed in improving such capacity?

The Kentucky Department of Education's (KDE's) monitoring and accountability process was specifically designed to build capacity at the state and local levels and to ensure that, following an intervention process, schools and districts would have a greater understanding of the organization and practices necessary to run a successful school centered around student achievement. As previously discussed, the foundation of the process is the work of the department's Office of District 180 and the intensive intervention strategies the office will employ with the Priority Schools and Districts to radically improve struggling schools. This process was originally developed to meet the requirements from the U.S. Department of Education for addressing the needs of persistently lowest-achieving schools and has been successfully implemented for the previous two years on those schools. Based on analysis of this year's statewide assessment results from participating schools, the process has been extremely successful in increasing student performance and improving the schools' capacity. Staff monitoring Focus Schools and other non-rewards schools will have the ability to access the information and resources used with these schools in order to build capacity with the schools and districts under their purview.

The improvement process in Focus Schools with its requirement for gap-specific targeted planning and implementation also is designed to make sure that capacity is built at both the district and school levels. The plan development, resources available through the electronic planning and monitoring ASSIST (Adaptive System of School Improvement Support Tools) tools and interaction with the KDE cross-functional, cross-agency teams accessing District 180 resources will work together to ensure that successful practices are learned and incorporated into the ongoing work of the school and district. Equity and gap closure is a core value in Kentucky's reform agenda and is evidenced throughout this waiver request.

KDE plans to take advantage of all opportunities available to consolidate and target federal funding sources to assure sufficient support can be provided to successfully implement the interventions outlined in this application.

Priority Schools

The Office of District 180 provides educational recovery services that focus on the Priority Schools and Districts identified for school improvement to provide supports and raise expectations for students in the lowest-achieving schools and allow more of these students to graduate college- and career-ready. Three locally-based Centers for Learning Excellence (CLE) are located in Kentucky universities in the east, west, and central parts of the state, and each identified school/district will be assigned to a center. The CLEs are staffed by an Education Recovery Director (ERD), who manages the process in all the assigned schools and districts in his/her region and serves as a liaison with KDE, the appropriate regional education cooperatives and the center. An Education Recovery Leader (ERL) is assigned to each school and becomes the lead administrator in the school. Both ERDs and ERLs are identified from a pool of applicants who have experience in leading schools to improve achievement and closing achievement gaps. Along with these staff, Education Recovery Specialists (ERS), who specialize in working with teachers to make dramatic improvement in instructional practice that leads to improved student learning, are assigned to each school. The centers coordinate the support being provided to these Priority Schools/Districts.

Once a school/district has been identified, intervention efforts begin with their assignment to a CLE and the assignment of Education Recovery staff. Specific school improvement training is provided to all staff to begin the process. The planning process, which is facilitated by the Education Recovery staff, identifies areas in need of additional attention. Capacity building begins with the delivery of targeted professional development, including the use of Teacher Turnaround Teams, a collaborative effort with representatives from KDE, the CLE and the school). These schools are required to have short-term 30-, 60- and 90-day plans and have access to the planning and monitoring component of ASSIST. These initial plans address the immediate activities that will occur and the expenditure of school improvement funds to support the activities.

Kentucky is fortunate in having extensive experience in identifying and successfully intervening in low-achieving schools and districts. For approximately 20 years, Kentucky has had an accountability mandate by virtue of state law and a requirement to identify and further train the most skilled educators in the state. Therefore, cadres of highly-trained, experienced individuals who are knowledgeable about the elements that make a school successful are continually available. Research-based strategies and activities, proven practices and extensive resources have been collected and maintained. The implementation work of the Office of District 180 provides a framework for addressing the needs of other low-achieving schools and the District 180 in-house and contract staff serve as advisors and resources to other Frankfort-based staff working with Priority Schools/Districts and other low-achieving schools and districts.

Focus, Progressing and Needs Improvement Schools/Districts

The Focus, Progressing and Needs Improvement Schools or Districts will be monitored by specifically assigned KDE staff as they oversee the revision and implementation of the improvement plans. Staff will review the submissions from these school/districts and assess weaknesses that could become obstacles to successful completion of the plans. Staff will assess levels of implementation and recommend appropriate and targeted interventions specifically designed to address the identified concerns.

Comprehensive District Improvement Plan (CDIP) and Comprehensive School Improvement Plan (CSIP) monitoring and technical assistance for these schools and districts will be through the cross-agency, cross-functional department team to which the schools/districts have been assigned. The teams have representation from all areas of the agency and are expected to establish ongoing relationships with the districts/schools they monitor. Through that process, the team will be better equipped to identify areas in need of assistance and work with schools/districts to locate appropriate resources and support.

Holding School Districts Accountable

In addition to the above monitoring requirements, KDE will have a requirement to review and approve all submissions as part of 703 KAR 5:225, approved by the Kentucky Board of Education on June 6, 2012, to monitor implementation of district plans and provide necessary guidance based on information gathered from sources including, but not limited to, progress reports from the district, data reviews and on-site observations. State and local accountability is outlined in this proposal and while KDE holds districts accountable, there also is a clear expectation for districts to hold their schools accountable. Hence, school districts are expected to be primarily responsible for the compliance of their schools.

The automated ASSIST system provides the state agency with monitoring capacity arising out of the school and district planning processes. It will allow school districts to upload a number of compliance documents, send them electronically to KDE and receive feedback. It will provide the state agency with a centralized location for all monitoring documents and activities and should reduce the number and frequency of on-site visits required. The purpose for implementation of ASSIST was to make school district reporting requirements less burdensome on schools/districts and to streamline and make state agency monitoring efforts more efficient.

Sources of Funding

Kentucky plans to use the following federal funding streams to support implementation of its differentiated accountability, consequences and support system:

- 1003 (a) funds will be targeted toward academic achievement and building capacity in Priority and Focus Schools.
- Any present or future 1003(g) funds will be awarded to Priority Schools.
- Transfer of funds from other eligible federal sources will be allowed, within specific guidelines.

- Districts will have the option to designate future 21st Century Community Learning Centers funding to support extended learning opportunities occurring within the school day as well as during non-school hours or periods when school is not in session.
- Title I, Part A "set-asides" will be used to support school improvement activities, especially in Focus and Priority Schools.
- Schools receiving assistance under RLIS or SRSA will be encouraged to direct this funding toward their lowest-performing schools – Priority and Focus Schools.
- Title II highly-qualified teacher funding will assist in supporting elements of the system relative to teacher retention, recruitment and capacity building.
- Priority and Focus Schools that do not meet the 40% poverty guidelines for eligibility to operate a school-wide program will be allowed to become school-wide programs if other requirements are met.
- Kentucky will allow the use of Title I funding for rewards in Reward Schools.

Specific Uses of Federal Funds

Federal funds will be used to deepen the work of the District 180 Education Recovery process relative to Priority Schools and extend the results of this work to Focus Schools and other schools in need of assistance. Funds will be utilized in a targeted way to build capacity for change and improvement in Priority Schools and to develop replicable systems in Priority/Focus Schools in order to address low achievement and achievement gaps. Removal of restrictions on the use of these funding sources will allow the state to direct substantial resources to the schools with students having the greatest need.

1003(a) funding will be divided and distributed in two different ways. Schools will first receive funding based on a per-pupil amount. The funding would be used to implement school-specific, data-identified needs. Once schools have begun implementation, they will have the opportunity to apply for additional funds to implement new, research-based approaches through application to the Innovation Fund. Innovation grant applications will require the district to provide assurances, prior to receipt of the award, that the initial per-pupil amount and the "set asides" are being used consistently with requirements, are allocated in support of school improvement, and are focused on the lowest-performing schools. Funds will be used for:

- Formal review processes to determine school and district status and leadership capacity to successfully implement reform
- Additional staffing (Educational Recovery staff) to support the turnaround processes taking place within the school/district with the goal of building sustainable systems and capacity
- "Turnaround school" training events and follow-up from those events to assure consistent and accurate understandings
- Regional Centers for Learning Excellence that coordinate the work of all identified schools and districts in need of improvement in their assigned region
- Activities to support teacher capacity-building, recruitment, and retention, such as Teacher Turnaround Teams (TTT). These teams of teachers within a school will be provided immediate, targeted, intensive professional development on school improvement and continue to meet throughout the school year. Follow-up and

coaching to the training will be conducted in the classroom setting to assure that the learning is transferred. Summer Institutes will continue this learning and allow the teacher teams to form groups by subject area to focus on individual needs of students and receive additional assistance in those areas. The professional learning communities these teachers form as a result of their involvement in the TTTs will become embedded practice. Teachers will become incentivized, through payment for additional days in the summer to first attend the TTT meetings and then to continue the process by training other teachers in the process. This additional pay will serve as a motivator to ensure that highly effective teachers are matched with the students of greatest need.

- Establishment of an "Encircle Each Student" plan. This process will identify a number of extremely capable students that might not otherwise be expected to be successful. Twenty-First Century Community Learning Centers funding may be used to support this activity.
- Development and successful implementation of the ASSIST (Adaptive System of School Improvement Support Tools) planning and monitoring tool, which will be central to the Comprehensive School and District Improvement Plan process used in Priority, Focus, Progressing, and Needs Improvement schools. (See Kentucky's waiver request, pages 48, 49, 50, 73, 84, 85, 86, 87, and 89 for references to ASSIST.)
- Identification of teams to provide additional support to Focus Schools in individualizing their school plans and differentiating follow-up based on their needs as identified through the ASSIST planning and monitoring tool
- Diagnostic reviews of alternative pathways to success available to students, such as alternative school programs and digital learning opportunities, and providing support to increase access to college and career readiness for non-traditional students
- Implementation of a networking plan that provides Priority and Focus Schools a web presence to exchange ideas and successful practices

Support to Assure Successful Interventions

Kentucky is committed to assuring that appropriate support is available to ensure the successful implementation of the intervention strategies within the accountability system, and the building of state and local capacity through that process. In addition to the funding made available through flexibility waivers, Kentucky will leverage the use of currently-existing state and private funding sources, and current levels of Kentucky Department of Education (KDE) staffing to support the successful implementation of the accountability system.

As Kentucky has implemented the District 180 Education Recovery process for the last two years to serve persistently low-achieving schools, KDE is confident in the ability of the agency to support the process. Multiple state-level funding sources assist with implementation of the process, although the number of schools in need of service has increased this school year. The funding flexibility that the waiver would provide will allow for extension of the process to additional schools and implementation of the strategies listed above.

The planning and monitoring tools provided through the ASSIST system are already in the development process as the state is committed to providing an automated planning/monitoring system for schools and districts in order to relieve paperwork and reporting burdens.

Additional federal funding available under the ESEA wavier flexibility would help to assure that the system is sufficiently robust to provide highly effective local practices and that sufficient staff support is available to ensure successful local deployment. As with any major improvement effort, Kentucky will monitor implementation, evaluate the effectiveness of the intervention process, and make mid-course adjustments as needed to assure the success of the accountability measures outlined above.

Granting of the ESEA waiver request is vital for Kentucky to be able to creatively combine sources of federal and state funding to effectively support implementation of interventions by schools and local education agencies. It is also central to successful implementation of the state agency's system. Kentucky will be able to use 1003(a) funds to support District 180 education recovery activities in Priority Schools and the comprehensive planning process in Focus Schools, which will provide greater assistance to a more targeted number of schools than previously allowed. Expanding the use of the 20% LEA set-aside of 1116 (b) (10) funds previously used to provide supplemental education services, transportation and professional development will allow additional funds for use at the local level to support implementation of KDE-approved professional development and other school-specific needs as identified through the comprehensive planning process. Eliminating the 40% poverty requirement for Priority and Focus Schools to operate school-wide programs, if needed, will assure more thoughtful, comprehensive, and cohesive local interventions. Allowing greater flexibility to transfer funding from other programs into the Title I program will provide additional financial support to be redirected to improvement activities, and will encourage greater integration of the planning process to ensure that the needs of all programs can be addressed and the combined funding can be most effectively leveraged.

KDE plans to take advantage of the financial flexibility allowed through the waiver to most effectively support implementation of the interventions in the lowest-achieving schools. Any remaining funds may be offered to the lowest-achieving schools on a competitive basis.

Quality of Vendors

Questions have arisen regarding the means by which states assure that external staff hired to assist with implementation work are of sufficient quality and experience. Kentucky has a number of protections designed to ensure that this is occurring. First, the state must abide by bid law requirements. Under these laws, procurements involving technical or complex requirements are bid competitively through negotiations or by formal Request for Proposal (RFP). Both require a formal bid process through an open solicitation and an award made consistent with requirements of the Model Procurement Code. The RFP process allows program staff the ability to set specific qualifications and require specific evidence of those qualifications, such as curriculum vitae of the staff responsible for the work, previous work of a same or similar type that has been recently completed and lists of references that may be contacted. These are evaluated against the requirements listed in the RFP to determine the winning proposal. If no satisfactory candidate has applied, the agency is not required to select a proposal and can rebid the process, if desired.

In the past, Kentucky has directly hired a number of vendors with which low-achieving

schools and districts may contract to receive services that are identified as necessary through the planning process. This is an additional means by which the state can control the quality of vendors available for selection. (2.G.a.i)

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
☒ If the SEA has not already developed any guidelines consistent with Principle 3, provide: 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).	☐ If the SEA has already developed and adopted one or more, but not all, guidelines consistent with Principle 3, provide: 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 adopted guidelines and the process to continue their involvement in developing any remaining guidelines; and 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).	☐ If the SEA has developed and adopted all of the guidelines consistent with Principle 3, provide: 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.

Guidance Question: Has the SEA developed and adopted guidelines consistent with Principle 3?

Kentucky selected Option A above.

Overview of Developing and Adopting Guidelines for Local Teacher and Principal Evaluation and Support Systems

The Kentucky Board of Education (KBE) set the vision to have every student taught by an effective teacher and every school led by an effective principal. Specifically, the development of a comprehensive professional growth and effectiveness system became one of the critical pillars of the state's Unbridled Learning strategic initiatives. The strategic plan of the Kentucky Department of Education (KDE) includes a specific goal to create a fair and equitable system to measure teacher and leader effectiveness. The system will consist of multiple measures including student growth, professional growth, artifacts and evidences, student/parent voice, peer observations, teacher self-reflection and classroom observations. The principal effectiveness system will incorporate the Val-Ed 360 process and use of the Teaching, Empowering, Leading, and Learning Kentucky (TELL Kentucky) Working Conditions Survey data to support school improvement planning.

The development of Kentucky's Professional Growth and Effectiveness System includes the principles found in this ESEA waiver request proposal. The development and adoption of guidelines, the process for implementation, policy development and the proposed monitoring and technical guidance are outlined below but will continue to be informed by ongoing, current research in the field that has been used to inform Kentucky's journey toward educator effectiveness.

Detailed Narrative on Developing and Adopting Guidelines for Local Teacher and Principal Evaluation and Support Systems

Background

Recognizing the need for stakeholder involvement and the will to develop and implement a new evaluation system, Kentucky Commissioner of Education Terry Holliday created two statewide steering committees charged to "provide guidance and oversight on the design, development and deployment of the Teacher and Principal Professional Growth and Effectiveness system." The key strategies to design and implement the effectiveness system include collaboration with education partners and the intentional involvement of school districts and schools. Teacher and Principal Effectiveness Steering Committees were formed, representing the Kentucky Association of School Administrators, Kentucky School Boards Association, Kentucky Education Association, Jefferson County Teachers Association, Council on Postsecondary Education, colleges and universities, Education Professional Standards Board, parents, and teachers, principals and superintendents from participating volunteer districts. Membership on the steering committees has evolved over the course of the year in an effort to meet the steering committees' requests to ensure voices from the volunteer districts that are piloting the system are

accurately communicated to the steering committees. Teacher and principal perspectives are a pivotal part of the efforts underway.

In July 2010, Commissioner Holliday shared the proposed implementation plan with the state legislature's Interim Joint Committee on Education. Representatives from the steering committees, specifically education partners, pledged their support and promised active participation in the development of the professional growth and effectiveness system. The 2010 Interim Joint Committee presentation can be found at the following link: http://education.ky.gov/CommOfEd/pres/Pages/default.aspx.

Guiding the Development

As a state, Kentucky must address six components within the teacher/principal effectiveness system in our waiver proposal and the Kentucky Board of Education must adopt the system prior to June 30, 2012. The components are as follows:

- continuous improvement of instruction
- meaningful differentiation of teacher/principal performance using at least three performance levels
- multiple measures of effectiveness including use of student growth data (both state standardized tests and formative growth measures that are rigorous and comparable across schools in a district) as a significant factor
- regular evaluation (most likely annual)
- clear and timely feedback to include opportunities for professional development
- use of the system to inform personnel decisions

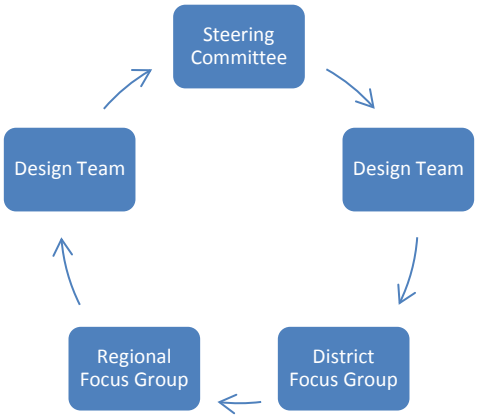
The revision of the current certified personnel evaluation system would include a dynamic shift from individually approved evaluation systems to a statewide valid and reliable system focused on the professional growth of educators and student growth and achievement. This change is necessary to meet the expectations of Unbridled Learning and to ensure all students are college- and career-ready.

Kentucky is committed to including multiple measures in the new system such as student growth, professional growth, artifacts and evidences, student/parent voice, peer observations, teacher self-reflection and classroom observations. The Kentucky Board of Education and Kentucky Department of Education, in partnership with the two steering committees, also are committed to the following:

- no public reporting of individual teacher data
- not supporting student growth as a single measure for making personnel decisions
- agreement that an educator effectiveness model focused on continuous improvement is only beneficial if the data and information from the system are used to improve instructional practices leading to improved student learning outcomes

The Teacher and Principal Effectiveness Framework was developed as the state's first deliverable related to this work. The state, working alongside the Steering Committees' members, initiated a process to fully engage volunteer districts and schools in the early development work. The process became known as the focus group cycle. This cycle began with

the steering committees providing guidance and direction to volunteer districts through a group of facilitators known as the Integrated Design Team (IDT). The IDT lead district and regional focus group meetings through an iterative process involved the development of standards, domains and descriptors as part of the overall effectiveness framework. The data gathered through this process were synthesized and presented to the steering committees for recommended guidance and decision making as outlined in the diagram below. (3Ai)



Framework Development

In an effort to jump-start the identification of the characteristics of effective teaching practices, participating districts began the year using a rubric of teacher effectiveness that was the result of Wallace Foundation work guided by the Kentucky Department of Education (KDE) from previous years. The rubric served as a baseline for the Teacher Effectiveness Steering Committee and the volunteer districts. Edvantia has provided technical assistance to KDE throughout the development process. Specifically, Edvantia consultants have played an instrumental role in sharing the process for validity and reliability relative to the rubric design. At the meeting facilitated by Edvantia, the integrated design team also shared the website, www.kyprofessionalgrowth.webs.com, where notes from district and regional focus group meetings are stored, along with many other resources. Changes to the initial Wallace Foundation Rubric to create the Teacher Effectiveness Framework 2.0 was an outgrowth of the regional focus group work. (3Ai,ii)

The Teacher Effectiveness Framework 2.0 had a horizontal layout, with the "accomplished" expectation nearest the standard (one of the recommendations from the steering committee). There also were changes in the language of the descriptors that were clearer and more concise, avoiding words such as "regularly" or "occasionally." The Wallace Foundation rubric had a numbering scale from 1-8 that caused concern for many members of the steering committee. After discussing options with the volunteer districts, and without consensus on the inclusion or removal of the numbers from the focus groups, the design team revised the number scale to two scales of 1-3 for both "accomplished" and "developing" in an effort to appease both sides of the issue. Questions still remained about the numbers, and these were discussed at length during the December 3, 2010, steering committee meeting. These questions focused on how the numbers on the framework would be used to help with teacher growth, and it was clear that the steering committee did not want to use the numbers as a "score card." These concerns and guidance were

shared with the integrated design team and ultimately with the volunteer districts to gather their feedback in regard to the inclusion of numbers and their use. (3Ai, ii)

Similar to the development of the Teacher Effectiveness Framework, the Principal Steering Committee charged a core group of stakeholders to develop the initial framework. Working with the integrated design team members, principals, superintendents, university education leadership staff, and members of the Kentucky Association of School Superintendents and Kentucky Association of School Administrators developed the first draft of the principal effectiveness framework. The work was further influenced by Dr. Joseph Murphy and the Continuum for Principal Preparation and Development. Dr. Murphy provided a thorough introduction to the Val-Ed 360 principal evaluation instrument and a crosswalk with the Interstate Leadership Licensure Consortium (ISLLC) Standards. (3B)

The March 22, 2011, steering committee meetings were an opportunity to review the changes that were made in the Teacher and Principal Effectiveness Framework 2.1 and discuss insights on the framework that were gained by sharing it with Dr. James Stronge at an Appalachia Regional Comprehensive Center- (ARCC) sponsored Community of Practice meeting in Charlotte, North Carolina. Some of the insight gained from Dr. Stronge included ideas such as reviewing our standards and domains to make sure we were thorough but concise, inclusion of student growth in the framework (also a recommendation from teachers and administrators in the volunteer districts), elimination of numbers and making sure descriptors from each level built upon one another. With those recommendations in mind, the Integrated Design Team worked to develop a domain and standard related to student growth and achievement.

This work was shared with the steering committees to gather feedback on how it could be improved and included into the Teacher and Principal Effectiveness Frameworks. The steering committees were split into smaller groups to take more in-depth looks at specific domains of the framework and also provide insight into the inclusion of the student performance domain. Minor changes were recommended to the first three domains of the framework, and suggestions for the student performance domain included the elimination of the school-wide measures descriptor and refinement of the language of the student growth and gap descriptors. Based on the feedback from the steering committees, versions 3.0 of the teacher and principal frameworks were created. (3Aii)

In collaboration with ARCC and Edvantia, KDE arranged for Dr. James Stronge to work with the steering committee members, volunteer districts, integrated design team members and university partners on April 13 and 14, 2011, in Louisville, Kentucky. The two-day workshop included presentations from Dr. Stronge about teacher effectiveness, rubric development, professional development, measuring student growth and achievement, and teacher and principal evaluation.

Dr. Stronge met with Edvantia and the Integrated Design Team on April 14, 2011, after the large-group workshop to specifically discuss the Teacher Effectiveness Framework and possible next steps for Kentucky. He commended Kentucky's progress on the current framework and offered suggestions for future work. These suggestions included a focus on training, communication and the development of documents to support the field test and pilot

implementation.

In July 2011, KDE again solicited the involvement of school districts, expanding the opportunity to an additional 25 districts. With a total of 50 volunteer districts, the next phase of this work will focus on implementation of the effectiveness frameworks by exploring and defining the multiple measures. Additionally, these districts will inform the steering committees on the process and protocols, instrumentation development and the use of student growth data in the assessed and non-assessed areas. KDE is working closely with the Bill and Melinda Gates Foundation and the Center for Leadership and Technology to fully implement the Teacher of Record definition.

Currently, the state is facilitating a process to assist the 50 volunteer districts to explore some guiding questions related to the above topics. For example, a key question related to student growth was whether to imbed the student growth descriptors throughout the framework or include them in a separate domain. The stakeholder feedback and responses can be found in Attachment 22 on page 219 of the Appendix. Based on these responses, the steering committees made a recommendation to add student growth as a separate domain to Kentucky's framework. (3Ai & 3B)

The current version (3.1) of the frameworks was developed based on school districts' and the steering committees' feedback. The frameworks now include four domains: instruction, learning climate, leadership and professionalism, and student growth. The Teacher Effectiveness Framework and the Principal Effectiveness Framework can be found as Attachment 23 on page 223 of the Appendix.

Validity and Reliability

In October 2011, the teacher and principal frameworks went through a content validity process consisting of retranslation and calibration of indicators. Members of the teacher and principal steering committees were selected to participate on a Core Stakeholder Team. The Core Stakeholder Team was charged with conducting a thorough review of the teacher and principal frameworks to determine what, if any, descriptors needed to be added to prepare the frameworks for the upcoming validity and reliability processes. The team developed the review process based on the following guiding principles:

- The Core Stakeholder Team represents and values the work and dedication of the volunteer school districts and the members of the steering committee.
- Any recommended descriptors that are added must maintain the intent and integrity of the stakeholders that the Core Stakeholder Team represents.

The following members serve on the Core Stakeholder Team:

Mary Ann Blankenship Kentucky Education Association (KEA)	Robert Brown Education Professional Standards Board
John DeAtley Council on Postsecondary Education	Kathy Donaldson Teacher
Amanda Ellis Teacher	Shirley LaFavers Kentucky Association of School Administrators
Ann Larson	Brent McKim

University of Louisville	Jefferson County Teachers Association
Jim Rinehart Eastern Kentucky University	Stephanie Sullivan Principal
Stephanie Winkler Teacher – Local KEA representative	

To make sure our steering committee members understand the process and intent of the aforementioned work, the Core Stakeholder Team presented the content validity preparation process and findings during a webinar session in October. (3Aii, 3B)

Content Validity Assessment

Edvantia has been contracted to conduct the content validity assessment of the teacher and principal effectiveness frameworks. Approximately 50 in- and out-of-state subject matter experts representing teachers, principals, university faculty and superintendents participated in retranslation and calibration activities to establish content validity for the aforementioned frameworks. KDE will receive a report of the findings for this initial process that will identify the descriptors not meeting the same level of agreement as the result of the assessment. The summary findings from this assessment will be presented to the steering committees in November. The process outlined above clearly shows the nature of an interactive process capturing the ongoing development and implementation of this system. Superintendents, principals and teacher leaders in the volunteer districts, steering committee members, key stakeholders and KDE staff are engaged in presentations, workshops and webinar sessions to continue to promote a deeper understanding of the strategies for mitigating the complexities of this work. Kentucky remains committed to applying new learning from the current research focused on measuring effective teaching.

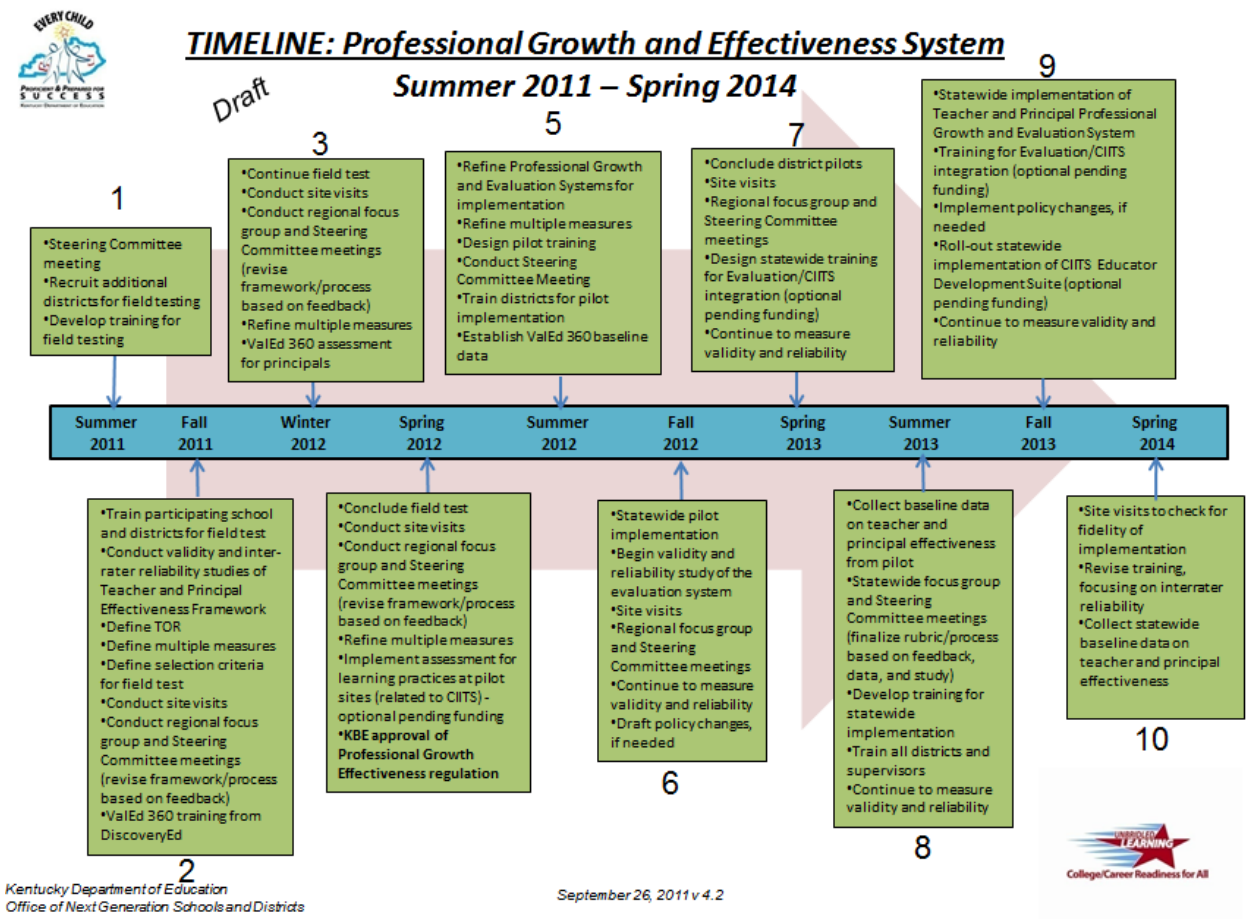
Adoption of Guidelines and Policy Development

Over the past year, the Kentucky Board of Education (KBE) has engaged in at least one study session and several conversations focused on Human Capital issues. During the December 2011 board meeting, KBE members will hear the introduction of regulatory language for Kentucky's new teacher and principal effectiveness system. KDE staff is revising an existing teacher/principal evaluation regulation to accommodate the development of the Professional Growth and Effectiveness System. The proposed changes will identify the guidelines of the new system, specifically changing the individual district evaluation plan approval process to a statewide system adoption. The changes will address overall policy recommendations but also specific recommendations for challenges in evaluating special educators and ELL educators. Some of those recommendations include "ensuring the evaluation framework can identify and provide the professional development needs of special educators and ELL specialists and detect improvements in practice resulting in sustained job-embedded professional development, and establishing evaluator training that includes explicit training on the teacher effectiveness measures used with special education educators and ELL specialists or evaluators matched to a specific discipline." (TQ Research and Policy Brief, 2010) Other changes will include language to establish a statewide valid and reliable evaluation system based on multiple measures including student growth, teacher self-reflection, peer observations, professional growth,

observations and student/parent voice.

The steering committees have agreed upon the inclusion of four levels of performance -- exemplary, accomplished, developing and ineffective -- which will be outlined in the regulation language. And, the statewide system will be deemed the standard evaluation process in the state. However, school districts will have the option to develop a system of effectiveness as long as it meets the state's expectations for validity and reliability. Additional changes in regulation will highlight specific components related to tenured and non-tenured staff, evaluation processes for specialty educators (i.e., special education teachers and ELL teachers), as well as appeal procedure guidelines. These changes to the regulation will be informed by the field test so that the Kentucky Department of Education (KDE) has the appropriate input from general and special educators from the participating districts. Review and final approval of the revised evaluation regulation by the state board will occur in June 2012.

The detailed timeline for implementation of the Teacher and Principal Professional Growth and Effectiveness System is represented by the figure below:



Field Test

The preparation for the field test will begin in November 2011. KDE, in collaboration with the Bill and Melinda Gates Foundation and with technical guidance from Edvantia, will develop and implement training on the effectiveness frameworks and observation protocols and begin inter-rater reliability assessments. The fifty-four volunteer districts were asked to identify teachers that represent all grade levels and content areas, specifically with the criteria identifying all content areas including:

- English/language arts and mathematics teachers;
- Non-tested area teachers (i.e., arts and humanities and practical living and career studies); and
- Critical focus areas such as special education and teachers of English language learners.

The intentional approach to the selection of field test participants provides data collection opportunities across all grade levels and content areas while engaging teachers through multiple measures of effectiveness. This methodology will allow KDE to determine if the process, protocols, and instrumentation are appropriate in our non-tested areas specifically. The field test will allow the department to gauge how the process, protocols, and instrumentation should be modified for special education teachers and ELL specialists.

For example, the participants in the field test will have local and state assessment data to inform instructional practices and student growth needs. In the non-assessed areas the state is implementing program reviews that will require teachers to use state and national standards to identify and develop common assessments as evidence for the student growth multiple measure. In addition to the program reviews, non-assessed area teachers will demonstrate proficiency in a goal setting process to measure student growth throughout the year. Kentucky's common framework defines effective teaching for all teachers, as recommended in the TQ Research and Policy Brief: Challenges in Evaluating Special Education Teachers and English Language Learner Specialists (July 2010), and will capture the aforementioned evidence through the evaluation process.

The training will be administered in stages regionally to ensure high participation and saturation of the needed content. The collaboration with the Gates Foundation provides the opportunity to deploy the Measuring Effective Teaching validation engine to ensure observation protocols and instruments meet the inter-rater reliability expectations. Principals and supporting educators, including educators who work with SWDs and ELLs, participating in the formative and summative evaluation process must meet inter-rater reliability expectations. Extensive training and preparation with volunteer districts will address evaluator consistency as well as the accuracy of the observation instruments and protocols. Additionally, Strategic Data Fellows working with KDE will conduct correlation studies on the multiple measures and student growth to inform the decisions that will still need to be made about the effectiveness system (i.e., weighting of each measure, including student growth in the overall system).

Beginning in February 2012, KDE will conduct a field test of the effectiveness system. The goal of the field test is to assess inter-rater reliability, refine processes for the implementation, and test the definitions for Teacher of Record (TOR) to ensure appropriate linkages are made with the

statewide teacher/student growth measures.

Kentucky is one of three Gates Integration States identified to participate in a partnership grant to establish a comprehensive Teacher of Record (TOR) definition. The partnership led by the Center of Education Leadership and Technology (CELT) will support the work underway to ensure the critical elements are in place to establish initial student and teacher data linkages. Some work had begun on this topic in the summer of 2011. The department launched the CIITS system including instructional materials, common core standards, and key professional development resources. Approximately 12 early adopting districts began testing teacher and student rosters, protocols, and procedures to determine system accuracy and common practices for teacher assignment and scheduling. The initial implementation provided opportunities to identify gaps, establish system business requirements to ensure statewide consistency, and delineate the unique linkages between students and teachers at each school level. Furthermore, before the end of February pilot districts will receive state assessment data from the accountability model that will be in a format to check the teacher/student data linkages.

The CELT has provided a framework to guide Kentucky's development process. The phases include: student and teacher roster business requirements and data verification, defining teacher role groups (contributing educators), and definition development and refinement for pilot year implementation. The first step is establishing the purpose and intent of the definition, roles within the system, how educators contribute to student growth, and ultimately how the definition offers the flexibility needed to establish primary and contributing educator impact on student learning. During the field test phase of the professional growth and effectiveness system, Kentucky will further expand the roster verification process to inform how primary and contributing educators are linked to students.

Kentucky will continue to refine the TOR definition to meet the recommended characteristics provided by CELT. The characteristics include:

- Be flexible to cover all grade levels, pre-K through 12.
- Accommodate teacher assignment changes and turnover during the course of the semester or year.
- Be supportable by current systems and data collection methods.
- Be clear and understandable for all stakeholders.
- Be applicable to all teachers and cover all courses and subjects including virtual (online) courses.
- Accommodate multiple (contributing) educators for a given subject/course (e.g., pullouts).

Results of the field test will further define the guiding principles of effectiveness, including decisions that will need to be made about instrumentation for teachers of students with disabilities and ELL specialists. The findings from the field test and correlation studies to be conducted will be shared with the two statewide steering committees and submitted for approval to the Kentucky Board of Education.

Pilot Year Implementation

The data collected during the field test will inform the preparation and training design for the statewide pilot year implementation. In order to prepare superintendents and district leadership teams, KDE will begin a messaging campaign for all districts through the Leadership Network infrastructure in March 2012. Preliminary information will be shared to help the districts learn about the process for the statewide pilot beginning in the fall of 2012. This work session will specifically address:

- Purpose and intent of the professional growth and effectiveness system (what it is and why);
- Expectations within the field test; and
- Championing change and building capacity for the statewide pilot and implementation.

Districts that were engaged in the field testing will serve as model sites for statewide implementation. District leadership teams will engage in two initial days of professional development to launch the statewide rollout in June 2012. As a follow up, district teams will continue to meet monthly to maintain implementation throughout the pilot year phase. During these sessions, the KDE will be supporting a similar rolling implementation approach throughout the 2012-13 school year. Local districts will have the flexibility to stagger the implementation bringing a few schools on line throughout the year. The goal of this approach is to ensure the local districts have the capacity to implement with fidelity. By March of 2013, local districts using this approach must have all schools trained and implementing the Professional Growth and Effectiveness System. Other districts may choose a system-wide implementation approach. The size and capacity of the districts will likely dictate which of the aforementioned approaches are used.

In the fall of 2012, the professional growth and effectiveness system will be piloted statewide to ensure inter-rater reliability and support school district capacity to implement the system. All 174 school districts will participate in the pilot implementation. Districts will select schools and appropriate staff based on selection criteria. (See Attachment 24 on page 265 of the Appendix). The IDT will provide training and professional development on the effectiveness system. Inter-rater reliability training and assessments will be conducted using the Measures of Effective Teaching (MET) engine and juried video teaching segments. The IDT also will provide training and technical support throughout the year, beginning with the process for implementing the use of multiple measures. The training and preparation for the pilot implementation will be conducted regionally in collaboration with education cooperatives. The goal is to build capacity regionally to support the fidelity of implementation.

Collaboration with university partners is essential, specifically in the areas of education leadership and teacher preparation. The Education Professional Standards Board (EPSB) will assist KDE in identifying key education preparation staff to facilitate the opportunity to develop a continuum from preparation to practicing professionals. Additional training will be offered to university and school district staff that are responsible for the Kentucky Teacher Internship Program. The EPSB has agreed to align the standards for the internship program with the professional growth and effectiveness frameworks.

District and regional meetings will continue monthly to gather feedback and inform the technical assistance and support services, specifically targeting feedback and input on the instrumentation used, TOR definitions and data, and process and capacity to implement. The IDT will serve as the department technical assistance arm to support districts and schools through this pilot implementation phase. The IDT will conduct periodic reviews of the effectiveness system's implementation to ensure fidelity to implementation and continuous support. The data collected from the reviews and technical assistance visits will inform the development of the state's monitoring protocols and procedures.

Teacher and Leader Effectiveness and Statewide Accountability

Next-Generation Professionals is the third pillar of the state's accountability model and comprises 10 percent of the state's Annual Measurable Objective (AMO) formula. The vision for the teacher and principal effectiveness portion of the AMO calculation will mirror the process articulated within the gap measure explained on page 35. School districts will be held accountable for the professional growth of all educators and specifically for those performing below the accomplished performance level in the professional growth and effectiveness system. Baseline data will be collected in the spring of 2014. Targets will be set to increase the percentage of accomplished educators and ultimately increase college and career readiness. The professional growth and effectiveness system will provide data to target support to teachers and leaders in Focus and Priority Schools.

Under the current teacher quality model, only highly qualified teacher (HQT) data are reported. The opportunity through the ESEA waiver process allows Kentucky to shift from a pure HQT accountability approach outlined in Title II, Part A to measuring teacher and principal effectiveness to facilitate College and Career Readiness for All. The proposed approach will identify school districts that do not meet the expectations in the accountability model. The flexibility offered through the waiver will allow Kentucky to guide school districts to maximize the use of federal funds to meet the needs of students while enhancing the effectiveness of teachers and principals.

Proposed Effectiveness System Monitoring

KDE will develop a comprehensive monitoring system to support system implementation, data accuracy and integrity, as well as technical assistance to school districts identified as being in Teacher Quality Improvement Status and Teacher Quality Accountability Status. During the pilot year of implementation, KDE will work with education partners and school districts to develop the monitoring system. As part of the Continuous Instructional Improvement Technology System (CIITS) implementation, KDE will develop a district- and state-level data collection module to meet the reporting requirements of the state's accountability system. The data collection module will provide school districts the opportunity to gather data on the performance levels of educators to inform the equitable distribution of effective educators. Additionally, school districts will have access to professional growth data to target professional development needs based on student achievement.

The state portion of the data collection module provides two key elements. First, state-level

reporting of effective educators is a component within the accountability system. Second, the data collection module allows the state to monitor district- and school-level performance ratings to determine growth of educators and inter-rater consistencies of evaluators, as well as professional growth needs to support district-level capacity. As an added benefit, the aggregate data at the state level will be shared with the Education Professional Standards Board for its data dashboard on the effectiveness of preparation programs. The pilot year for the professional growth and effectiveness system is scheduled to begin in fall 2012. The first year of accountability for the professional growth and evaluation system will be the 2013-14 school year.

For Kentucky's project plan detailing the development of the Professional Growth and Effectiveness System to meet Option A, item i., see Attachment 25 on page 266 of the Appendix.

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.

Guidance Question: Is the SEA's process for ensuring that each LEA develops, adopts, pilots, and implements with the involvement of teachers and principals, evaluation and support systems consistent with the SEA's adopted guidelines likely to lead to high-quality local teacher and principal evaluation and support systems?

Overview of Ensuring LEAs Implement Teacher and Principal Evaluation and Support Systems

The use of two statewide steering committees is essential to the development process for the statewide effectiveness system. The charge to the committees is to "provide guidance on the design, development and deployment of the Teacher and Principal Professional Growth and Effectiveness Systems (PGES)." The steering committees' membership include regular and special education teachers, principals, superintendents and representatives from AdvancEd, Council on Postsecondary Education, Prichard Committee, Partnership for Successful Schools, Educational Professional Standards Board, Kentucky Education Association, Kentucky Association of School Councils, Kentucky Association of School Superintendents, Kentucky Association of School Administrators, Kentucky School Boards Association, Kentucky Parent Teacher Association and university faculty from teacher and principal preparation programs (3B).

The Kentucky Department of Education also extended an invitation to school districts asking for volunteers to develop two frameworks that would define "effectiveness" for the Professional Growth and Effectiveness System. Twenty-five districts answered the call for the 2010-11 school year. The volunteer districts represented rural and urban areas from four

regions of the state. A focus group process was established to engage teachers and principals from a variety of content areas and grade levels. The goal was to implement a grassroots approach in the development of the professional growth and effectiveness system. Data were collected at the district and regional levels to establish consistency across the volunteer districts. The synthesized data were submitted to the statewide steering committees for further guidance or approval. Additional volunteer districts were identified in July 2011, bringing the total participants to approximately 50 school district teachers and leaders. Additionally, the original 25 volunteer districts were polled to determine ways to improve the implementation of the professional growth and effectiveness system. Of the original 25 districts, 17 responded acknowledging the value of participation in the development process. Many stated having the opportunity to shape the development of the system has created a sense of ownership that will aid in the implementation of the final product.

Detailed Narrative on Ensuring LEAs Implement Teacher and Principal Evaluation and Support Systems

In the summers of 2010 and 2011, representatives from the steering committees and volunteer districts presented to the Kentucky General Assembly's Interim Joint Committee on Education. The charge from the committee was to continue the development process involving as many stakeholders as possible. The collected information from volunteer districts along with steering committee guidance and recommendations will be submitted to the Kentucky Board of Education (KBE) at its December 7, 2011, meeting in the form of an effectiveness framework (guidelines for measured effectiveness), guiding principles for the professional growth and effectiveness system and regulatory language to implement the system statewide. The board will be asked to provide feedback to Kentucky Department of Education (KDE) staff prior to bringing back the regulation for review and then final approval in the spring of 2012.

KRS 156.557(3) (c) requires the KBE to develop written guidelines for school districts to follow in developing and implementing an evaluation system for certified employees. The related administrative regulation establishes the requirements for the evaluation programs and policies of school districts. The current statue identifies the process for assessing certified staff, roles involved in certified evaluations and the components of the system. In section two of the statute cited above, school districts are required to develop an evaluation plan and procedures that must be approved by KDE. Administrative regulation 704 KAR 3:345 establishes specific guidelines for school district evaluation plan approval and will undergo revision in spring of 2012.

The proposed changes to the aforementioned regulation will identify the components of the new system, specifically changing the individual district evaluation plan approval process to a statewide system adoption. In November 2011, the state steering committees will review the initial draft of the regulation and provide recommendations to the KBE. The regulatory process also includes input from the Local Superintendents Advisory Council and Teacher and Principal Advisory Councils.

Components of the statewide system will include clearly articulated standards, multiple measures of effectiveness and four distinct performance levels. The regulation will offer some

flexibility to school districts seeking to develop their own evaluation system. However, the KDE anticipates that the KBE will establish strict criteria for any locally developed evaluation systems in order to ensure these systems meet the same validity and reliability standards.

Collaboration with the Council on Postsecondary Education and the Education Professional Standards Board is essential to the development of the Professional Growth and Effectiveness System (PGES). The involvement through the P-20 data collaboration, principal preparation program redesign and the teacher preparation and induction program review process have identified ways to connect teacher and leader preparation to teacher and leader performance. At each stage of the development process, volunteer districts' input will inform steering committee decisions on the development of the four domains, performance levels and the descriptors outlining expected practices for each performance level. The decision-making process is designed to elicit feedback from practitioners and gain consensus and support from all education partners involved. Ultimately, the volunteer district input informs the decision making of the statewide steering committees that leads to making recommendations to the KBE.

In addition, KDE has entered into a three-year partnership with the Bill and Melinda Gates Foundation to implement an integration grant that will use the PGES to support English and math teachers as they teach the state-adopted English/language arts and mathematics Kentucky Common Core Standards. The implementation of this grant will allow us to use the tools developed during the Measures of Effective Teaching (MET) Project to train the evaluators and to monitor the inter-rater reliability of the evaluators.

Obtaining a waiver from current requirements for use of federal funds would allow Kentucky to implement a system of support to provide technical assistance and accountability that aligns with the Kentucky Professional Growth and Effectiveness System. The Kentucky Department of Education proposes that identification of these districts currently identified as 2141(a) and 2141(c) be modified and allow flexibility regarding the use of federal funds. Modification of Section 2141 will not only increase the percentage of highly qualified teachers, but will improve teacher and leader effectiveness resulting in the achievement of Kentucky's Unbridled Learning: College- and Career-Ready for All goals and an increase in effective teaching and learning.

Proposed modifications include the following:

- Districts formerly identified as being in 2141(a) status would be identified as districts in Teacher Quality Improvement Status. Criteria for District Teacher Quality Improvement Status would include:
  - For two consecutive years the district has not maintained 100% highly qualified teachers as identified through the March LEAD Report from the Education Professional Standards Board; AND
  - The district has 15% or more of its teacher or leader workforce at the Ineffective performance level as identified by the Teacher and Leader Professional Growth and Effectiveness System; AND
  - The district has not met the Unbridled Learning Annual Measureable Objective

(AMO) for two consecutive years.

Districts identified as being in Teacher Quality Improvement Status would be required to develop Teacher Quality Improvement Plans. These plans must include scientifically-based research strategies to meet 100 percent HQT status, increase the percentage of Accomplished Teachers according to the Teacher and Leader Professional Growth and Effectiveness System and meet the district's AMO with the outcome of improved student learning. The plan must be developed by the district, in consultation with principals, teachers, school councils and parents. The plan must be completed within 30 days of the district being notified of the Teacher Quality Improvement identification.

- Districts formerly identified as being in 2141(c) status would be identified as districts in Teacher Quality Accountability Status. Proposed Criteria for District Teacher Quality Accountability Status includes:
  - For three consecutive years the district has not maintained 100% highly qualified teacher status as identified through the March LEAD Report from the Education Professional Standards Board; AND
  - The district has 15% or more of its teacher or leader workforce at the Ineffectiveness performance level as identified by the Teacher and Leader Professional Growth and Effectiveness System; AND
  - The district has not met the Unbridled Learning Annual Measurable Objective for three consecutive years.

Districts identified as being in Teacher Quality Accountability Status would develop and submit Teacher Quality Accountability Plans. These plans must include scientifically-based research strategies to meet 100 percent HQT status, increase the percentage of Accomplished Teachers according to Teacher and Leader Professional Growth and Effectiveness Systems and meet the district's AMO. This plan also must include a funding agreement that targets resources, including, but not limited to federal funds for the use of achieving the aforementioned goals. The funding agreement must support specific strategies identified in the Teacher Quality Accountability Plan to improve teacher and principal practices designed to increase student growth and achievement. Funds may be targeted in a way to build capacity and ensure sustainability for continuous growth and achievement. While a district is in Teacher Quality Accountability status, the Teacher Quality Accountability Plan will serve as the guide for technical assistance ensuring flexibility and the maximum use of federal funds. This plan must be developed by the district, in consultation with principals, teachers, school councils and parents. The plan must be developed and submitted to the Kentucky Department of Education within 45 days of the district being notified of the Teacher Quality Accountability identification.

The Kentucky Department of Education will transition to the Teacher Quality Improvement and the Teacher Quality Accountability status criteria in the 2013-14 school year.

Parent Notification

Districts identified as being in Teacher Quality Improvement Status **or** Teacher Quality Accountability Status must notify all parents of this status within 10 days of being notified by the Kentucky Department of Education. The letter must include:

- definition of the status
- reason the district was identified
- percentage of highly-qualified teachers providing instruction in core content areas
- strategies the district is using to improve teaching and learning

District Support

The Kentucky Department of Education will provide differentiated levels of support based upon the identified needs of the district. These services may include training for local school-based decision making councils, equitable distribution of staff, school improvement through enhanced teaching and learning working conditions, and comprehensive recruitment and retention strategies. Districts can expect technical assistance with the development of the Teacher Quality Improvement Plan, Teacher Quality Accountability Plan, determining effective use of funds and other areas of need that could include inter-rater reliability training and systematic professional growth supports. The aforementioned services are not inclusive and may be delivered in a variety of ways including but not limited to regional technical assistance services, Web conferencing and on-site visits.

All districts newly identified as being in Teacher Quality Accountability Status will receive an onsite technical assistance/monitoring visit. The visit would determine the area where additional supports are necessary to reach 100 percent Highly Qualified Status and improve teacher and leader effectiveness as well as meet the Annual Measureable Objective of College and Career Readiness.

Proposed Use of Funds and Waiver Flexibility Opportunities

Currently, federal funds must target funds to schools that have the lowest proportion of highly qualified teachers; schools identified for improvement, corrective action or restructuring; or schools having the largest average class size. A waiver regarding the use of federal funds would allow the Kentucky Department of Education (KDE) to focus not only on the highly qualified status of teachers and leaders, **but also on the improvement of their effectiveness**, which ultimately improves student growth and achievement. Additionally, KDE would be able to focus on the equitable distribution of teachers to reduce the disproportionate number of minority, low socio-economic and other populations of students being taught by ineffective, non-highly qualified and inexperienced teachers. A critical focus on the professional growth and development of educators must address the student growth needs at every school in the Commonwealth.

The use of funds would continue to be the focus of meeting the professional development needs of teachers and administrators. The flexibility would move school districts away from

the traditional use of funds to hire class-size reduction teachers toward an approach to assess the student and/or professional growth needs. There is little research to support that the reducing of class size has a profound effect on student growth and achievement, unless the student-teacher ratio is drastically diminished. Therefore, districts identified as being in Teacher Quality Improvement Status would not be allowed to hire additional class-size reduction staff beyond current staffing levels. Also, districts would not be allowed to hire additional paraeducators beyond current funding levels. Kentucky's theory of change has a clear, driving assumption that increasing effective teaching will improve student learning outcomes, as explained on page 16 of this waiver request.

Federal funds would be redirected to focus on areas of need that have often been implemented with little or no funding, such as recruitment and retention of highly effective teachers and leaders and salaries for staff whose focus is the improvement of teacher and leader effectiveness. KDE recognizes the valued opportunity to focus on student growth needs through this waiver. The development of the professional growth and effectiveness system, along with the flexibility and redirection of federal funds, will provide the support and leverage needed to reach the state's college and career readiness goals.