ALLIANCE FOR EXCELLENT EDUCATION

MEMORANDUM

To: U.S. Department of Education
From: Alliance for Excellent Education
Date: May 25, 2016
Re: Recommendations for Non-Regulatory Guidance for the Every Student Succeeds Act

The Alliance for Excellent Education (the Alliance) appreciates the opportunity to offer comments and recommendations as the U.S. Department of Education (ED) drafts non-regulatory guidance to assist states, districts, and other grantees to implement the Every Student Succeeds Act (ESSA). Please find below suggested non-regulatory guidance questions and answers with accompanying rationale for each recommendation. The Alliance looks forward to working with ED to ensure the implementation of ESSA prepares all students for postsecondary education and the workforce.

Table of Contents: Listed below, in no particular order, are the topics addressed in this document and the accompanying page with the suggested non-regulatory guidance and rationale for each topic.

- Identifying low-graduation-rate high schools, page 3
- Extended-year graduation rates and the identification of low-graduation-rate high schools, page 3
- Ninth-grade cohort formation, page 4
- Students with "the most significant cognitive disabilities" and high school graduation rate calculations, page 4
- Statewide accountability system, page 5
- Additional measures for diagnostic purposes within state accountability systems, page 5
- Indicators of school quality or student success, page 6
- Postsecondary education data and state and local report cards, page 7
- Higher-order thinking skills and understanding, page 8
- Comprehensive support and improvement, page 9
- Accountability for alternative schools, page 11
- Direct student services—"Personalized learning approach," page 13
- Direct student services—Required use of funds and providers, page 14
- Use of feeder pattern for secondary schools, page 15
- Community eligibility and school rankings and accountability, page 15
- Student transitions from middle to high school and from high school to postsecondary education, page 16
- Teachers and students with disabilities, English learners, and rural students, page 18
- Professional development and technology, page 19
- Out-of-school access to personalized, rigorous learning experiences, page 20
- Student Support and Academic Enrichment grants—Needs assessment, page 21
- Student Support and Academic Enrichment grants—Technological capacity and infrastructure, page 21
- Student Support and Academic Enrichment grants—Dropout prevention, page 22
- Teacher certification and licensing, page 22

- Teacher performance assessments, page 23
- Teacher shortages and recruitment, page 24
- Teacher residency programs, page 25
- School climate and working conditions, page 26
- Teacher and leader evaluation systems, page 28

Identifying low-graduation-rate high schools

Sec. 1111(c)(4)(D)(i)(II), State Plans, Identification of Schools

Suggested question(s)/answer(s)

1. *May a state set the adjusted cohort graduation rate (ACGR) for which identification of a high school is based upon above 67 percent?*

   Yes, in identifying schools, pursuant to Sec. 1111(c)(4)(D)(i)(II), states shall annually identify any high school that has a four-year ACGR at or below 67 percent. A state may set the graduation rate for which identification of a high school is based upon above 67 percent (e.g., a state may identify for comprehensive support and improvement, all high schools with a graduation rate at or below 70 percent).

Rationale: ESSA does not clarify that states should consider an ACGR at or below 67 percent as a floor and not a ceiling and that states have the flexibility to set the rate for identification higher than 67 percent. New Jersey, for example, currently identifies any high school with a graduation rate below 75 percent for intervention and support.[1]

Extended-year graduation rates and the identification of low-graduation-rate high schools

Sec. 1111(c)(4)(D)(i)(II), State Plans, Identification of Schools

Suggested question(s)/answer(s)

1. *If a state is using an extended-year adjusted cohort graduation rate (ACGR) to identify low-graduation-rate high schools, pursuant to Sec. 1111(c)(4)(D)(i)(II), by how many percentage points should the 67 percent threshold for identification be increased in order to identify low-graduation-rate high schools for comprehensive support and improvement?*

   States that are using a five-year ACGR should identify high schools with a graduation rate at or below 70 percent for comprehensive support and improvement. States that are using a six-year ACGR should identify high schools with a graduation rate at or below 71 percent for comprehensive support and improvement.

Rationale: The recent *Building a Grad Nation: Progress and Challenge in Raising High School Graduation Rates* report, which examines extended-year graduation rates across the country, found that on average, measuring the five-year graduation rate led to a 3 percentage point increase in a state's overall graduation rate. Measuring the six-year graduation rate led to an additional 1 percentage point increase in the overall graduation rate.[2] Therefore, states choosing to use an extended-year graduation rate for the identification of low-graduation-rate high schools should raise the 67 percent threshold by the above-mentioned amounts in order to ensure low-performing high schools are appropriately identified.

Ninth-grade cohort formation

Sec. 8101(23)(A)(i), Definition, "extended-year adjusted cohort graduation rate"
Sec. 8101(25)(A)(i), Definition, "four-year adjusted cohort graduation rate"

Suggested question(s)/answer(s)

1. *For the purpose of calculating the adjusted cohort graduation rate (ACGR), when is the date by which students must be included in the original cohort?*

   According to ESSA, this date must be the date by which student membership data must be collected annually by state educational agencies for submission to the National Center for Education Statistics under Sec. 153 of the Education Sciences Reform Act of 2002 (20 U.S.C. 9543), which is October 1 of each year.

Rationale: For the purpose of calculating the ACGR, both the extended-year ACGR and the four-year ACGR require the denominator of the formula to be based on "the number of students who form the original cohort of entering first-time students in grade nine enrolled in the high school no later than the date by which student membership data must be collected annually by state educational agencies for submission to the National Center for Education Statistics under Sec. 153 of the Education Sciences Reform Act of 2002 (20 U.S.C. 9543)." ESSA does not clarify that the date in the Education Sciences Reform Act is October 1 of each year. It is critical for the date of the cohort formation to be set by October 1; otherwise, students who drop out of high school later in the school year will not be appropriately included in graduation rate calculations.

Students with "the most significant cognitive disabilities" and high school graduation rate calculations

Sec. 8101(23)(A)(ii)(I)(bb), Definition, "extended-year adjusted cohort graduation rate"
Sec. 8101(25)(A)(ii)(I)(bb), Definition, "four-year adjusted cohort graduation rate"

Suggested question(s)/answer(s)

1. *If the graduation rate of a school identified for comprehensive improvement increases retroactively above the 67 percent threshold as a result of the graduation of students with the most significant cognitive disabilities, how does this impact the school's identification status?*

   A state may choose to no longer identify such a school for comprehensive support and improvement if the graduation rate increases above 67 percent.

2. *If the graduation rate of a school identified for comprehensive improvement increases retroactively above the 67 percent threshold as a result of the graduation of students with the most significant cognitive disabilities, how does this impact the ability of a school to receive funding under Direct Student Services (Sec. 1003(A)) or School Improvement (Sec. 1003(a))?*

   A state shall not revoke Direct Student Services or school improvement funding as a result of a change to a school's identification status.

Rationale: ESSA allows students with "the most significant cognitive disabilities" to be included as graduates in the four-year and extended-year adjusted cohort graduation rate (ACGR) calculations if they

receive a state-defined alternative diploma within the time period they are provided a free and appropriate public education. ESSA regulations need to clarify how this provision impacts accountability determinations.

For example, consider a high school with a graduation rate of 67 percent that is identified for comprehensive support based on the four-year ACGR for School Year (SY) 2015–16. If additional students with the most significant cognitive disabilities graduate the following year, this provision requires the graduation rate for SY 2015–16 to be increased retroactively. If the graduation rate increases to 68 percent, the statute does not clarify what happens to the identification status of the school or what happens to a school that receives school improvement funding.

Statewide accountability system

Sec. 1111(c)(4)(C), Statewide Accountability System, Annual Meaningful Differentiation

Suggested question(s)/answer(s)

1. *Is a state required to use an accountability index for differentiating school performance required under Sec. 1111(c)(4)(C)?*

   No. A state shall base its system of annual meaningful differentiation described under Sec. 1111(c)(4)(C) on all of the indicators in the state's accountability system. A state may use these indicators to develop an index that differentiates school performance or a state may use the indicators to identify and differentiate schools as required under this section *without* using an index. States are encouraged to implement systems that do not mask the performance of subgroups of students and supports transparency and continuous improvement across all indicators.

Rationale: Accountability indices/letter grades may mask student subgroup performance, over-simplify the complexity of school performance, or allocate confusing or inappropriate values to specific indicators. For example, the Education Trust finds that schools in Florida receiving an "A" have a reading proficiency rate for African American students of 58 percent.[3] An accountability dashboard, or other methods for implementing a multiple-measure accountability system, may be more effective in promoting transparency, supporting the continuous improvement of all schools, and allowing schools to more effectively measure deeper learning skills and competencies students need to be successful in postsecondary education and the workforce.[4]

Additional measures for diagnostic purposes within state accountability systems

Sec. 1111(c)(4)(B), Statewide Accountability System, Indicators

Suggested question(s)/answer(s)

1. *May a state include indicators within their state accountability and improvement system for school for diagnostic and intervention selection purposes in addition to the indicators required for identification under Sec. 1111(c)(4)(B)?*

   Yes, a state may incorporate additional measures for diagnostic purposes and to inform school improvement strategies and interventions in either comprehensive or targeted intervention and support schools. These measures should also be disaggregated by student subgroups for this purpose.

Rationale: Allowing for the use of additional measures for diagnostic purposes, rather than identification purposes, can help to identify the root cause of student performance. The inclusion of these measures will support all schools in making continued progress regardless of their identification status.

Indicators of school quality or student success

Sec. 1111(c)(4)(B)(v)(I), Statewide Accountability System, Indicators of School Quality or Student Success

Suggested question(s)/answer(s)

1. *What examples of criteria and indicators of school quality and student success may states utilize within their state accountability and improvement system for either identification or diagnostic purposes?*

   A state should select indicators of school quality or student success that are "measurable," "actionable," and "meaningful." A "measurable" indicator is valid, reliable, and stable over time. For example, "chronic absenteeism" (the number of students who are absent at least 10 percent of the school days in one year) is an indicator that can be collected and reported using a valid and reliable system and continuously over a period of time. An "actionable" indicator is one that can be impacted by the school. Again, chronic absenteeism is an indicator that an individual school can implement strategies and interventions to address. A "meaningful" indicator shows evidence demonstrating that improving performance will positively impact student outcomes, such as graduation rates or achievement. Research demonstrates that chronic absenteeism is strongly related to student achievement and high school graduation rates.

   The following are among indicators of school quality and student success that states may incorporate into their accountability systems for either identification or diagnostic purposes and are measurable, actionable, and meaningful:

   (A) For the purpose of measuring student engagement, pursuant to Sec. 1111(c)(4)(B)(v)(II)(III), a state may use rates of

   - chronic absenteeism, and/or
   - English learner re-designation.

   (B) For the purpose of measuring access to and completion of advanced course work, pursuant to Sec. 1111(c)(4)(B)(v)(II)(V), a state may use rates of access, performance, and completion of

   - Advanced Placement (AP) courses;
   - International Baccalaureate (IB) courses;
   - dual-enrollment and/or early college programs; and/or
   - advanced diplomas.

   (C) For the purpose of measuring postsecondary education readiness, pursuant to Sec. 1111(c)(4)(B)(v)(II)(VI), a state may use one or more of the following indicators:

   - completion of or performance in AP programs;

- completion of or performance in IB programs;
- completion of or performance in dual-enrollment and/or early college programs;
- rates of participation in postsecondary education, which may include enrollment, remediation, persistence, and completion;
- performance on college entrance/placement exams;
- high school readiness, including a composite of indicators such as middle school grade point average, attendance, and disciplinary incidents that are correlated with an increased likelihood of graduating from high school;
- rates of students earning an industry recognized credential;
- measures that integrate preparation for postsecondary education and the workforce, including performance in course work sequences that integrate rigorous academics, work-based learning, and career and technical education;
- completion of a state-approved career and technical program of study as described in Sec. 122(c)(1)(A) of the Carl D. Perkins Career and Technical Education Act of 2006; and
- performance on assessments of career readiness and acquisition of industry-recognized credentials that meet the quality criteria established by the state under Sec. 123(a) of the Workforce Innovation and Opportunity Act (29 U.S.C. 3102).

(D) For the purpose of measuring school climate, pursuant to Sec. 1111(c)(4)(B)(v)(II)(VII), a state may use one or more of the following indicators:

- rates of suspension and expulsion, based on the number of incidents and including in-school suspensions;
- transfer rates to schools within the local educational agency;
- student subgroup disproportionality in special education; and
- survey-based measures of students' social-emotional skills and/or school climate and culture that have been shown to correlate with students' academic and/or behavioral outcomes.

Rationale: In addition to student achievement, graduation rates, and English language proficiency, states shall incorporate at least one indicator of school quality or success which may include, for example, a measure of student engagement, student access to and completion of advanced course work, postsecondary education readiness, and school climate. Within each of these categories of indicators, there exists measures of varying quality in terms of their individual capacity to provide data that is both actionable and a meaningful assessment of student outcomes. It is critical that state accountability systems are structured to have the capacity to accurately identify low-performing schools and gaps in performance, as well as provide data to all schools that allows for continuous improvement, regardless of whether that school is identified for comprehensive or targeted support and improvement.

Postsecondary education data and state and local report cards

Sec. 1111(h)(1), State and (2), Local Report Cards

Suggested question(s)/answer(s)

1. *What information related to postsecondary education must be reported on state and local report cards?*

Where data is available, state and local report cards must report the number and percentage of students who graduate from high school and enroll the following school year in *credit-bearing course work* at an institution of higher education. States should also report the number and percentage of students who require remediation, as well their rates of persistence into the second year of postsecondary education, and their rates of securing a postsecondary credential within six years of initial enrollment. This data should be disaggregated by student subgroups and by high school diploma pathway.

Rationale: Under Sec. 1111(h)(1)(C)(xiii) and (2)(C), state and local reports cards are required to include, where available, data—overall and by subgroup—on the students who, in the first academic year after high school graduation, enroll in a program of postsecondary education. This data is limited in its utility since it does not provide information to the school, district, and community as to whether those students who enrolled were enrolled in and completed credit-bearing courses. In addition, many states offer multiple diploma pathways; however, not all pathways are aligned with college- and career-ready expectations. Few states report high school graduation rates or postsecondary education data that is disaggregated by subgroup and diploma pathway. This information is critical to ensuring that parents and students are able to make informed decisions regarding what diploma pathways in high school are most likely to lead to postsecondary education.

From an equity perspective, this data will show if traditionally underserved students are disproportionately enrolled in diploma pathways that are not aligned with college- and career-ready expectations, or are unlikely to lead to postsecondary education. These measures provide strong evidence of whether a student graduates from high school prepared for postsecondary education, rather than a prediction. Under the most recent waiver applications, only six states incorporate postsecondary education enrollment or rates of remediation.[5]

Higher-order thinking skills and understanding

Sec. 1111(b)(2)(B)(vi), State Plans, Academic Assessments

Suggested question(s)/answer(s)

1. *For the purposes of Sec. 1111(b)(2)(B)(vi), how should states and local educational agencies measure "higher-order thinking skills and understanding" for assessment purposes? What skills should be measured?*

   For the purposes of Sec. 1111(b)(2)(B)(vi), "higher-order thinking skills and understanding" shall be measured by assessments that provide students with the opportunity to demonstrate critical thinking, complex problem solving, and depth of knowledge skills and shall apply to locally selected assessments permitted under Sec. 1111(b)(2)(H) as well as state assessments.

Rationale: States are required to implement a set of high-quality assessments that involve multiple measures of student achievement, including measures that "assess higher-order thinking skills and understanding." However, ESSA does not clarify which skills should be considered higher-order for the purposes of meeting this requirement. ESSA guidance should suggest that for states to meet this requirement, assessments implemented by the state shall measure critical thinking, complex problem solving, and depth of knowledge skills, consistent with the criteria ED published for assessment peer reviews.

Comprehensive support and improvement

Sec. 1111(d)(1), School Support and Improvement Activities, definition of "comprehensive support";

Suggested question(s)/answer(s)

1. *What examples of information should states, districts, and schools consider as part of school-level needs assessments required under Sec. 1111(d)(1)(B)(iii) for schools identified for comprehensive support and intervention?*

   A needs assessment should review the school's data in the aggregate, and be disaggregated and cross-tabulated where possible, in such areas as

   (A) student performance data, such as performance on assessments, college- and career-ready indicators, graduation rates including characteristics of those students who are not graduating with a regular diploma, including students with disabilities who are assessed with an alternate assessment, course performance, credit accumulation and on track to graduate rates, and rates of rates of dropout recovery (re-entry);
   (B) school climate, such as the percentage of students chronically absent, annual rates of expulsions, suspensions, school violence, harassment, and bullying, and may include data provided by parent or student surveys and other school climate surveys and data reported as part of the Office of Civil Rights Data Collection; and
   (C) non-academic barriers that impact student achievement, such as student mobility, the availability of student academic and non-academic support services, behavioral supports, and other linguistically and culturally appropriate resources to address those barriers.

   A needs assessment should also examine the school's capacity to implement comprehensive reform, which may include an analysis of

   (A) staffing resources, such as the number, experience, training level, rating based on the local educational agency's performance evaluation system, responsibilities, and stability of existing administrative, instructional, and non-instructional staff;
   (B) the budget, including how federal, state, and local funds are being spent, as of the time of the assessment, for instruction and operations at the school level for staff salaries, instructional materials, professional development, and student support services, in order to establish the extent to which existing resources need to and can be reallocated to support the needed interventions;
   (C) the presence and capacity of potential partners to address the needs identified by the needs assessment and assist in the implementation of interventions; and
   (D) technical assistance, additional resources, and staff necessary to implement interventions.

2. *What examples of evidence-based strategies and activities should be implemented in schools identified for comprehensive support and improvement?*

   School and student support strategies should be specifically responsive to the context of the school and community and tailored to student- and educator-based needs identified through a needs assessment (such as the needs assessment described in question 1). Evidence-based strategies and activities that have demonstrated effectiveness in improving student outcomes include, but are not limited to

(A) increasing personalization, which may include
   (i) creating learning communities where teams of teachers share common sets of students, work together to assess and address students' needs based on timely and regularly updated data, and have the time and support needed to create personalized learning environments tailored to the needs of their students;
   (ii) continuous and timely use of early-warning and on-track indicators such as student attendance, behavior, and course performance and formative, interim, and summative assessments to inform and differentiate instruction and student support in order to meet the academic and socio-emotional needs of individual students;
   (iii) implementing strategies that develop caring, consistent relationships between students and adults that communicate high expectations for student learning and behavior;
   (iv) implementing multitier systems of support to respond to students' academic and behavioral needs through access to instruction and supports of varying intensities;
   (v) providing comprehensive and individualized support to students to assist in the transition from middle school to high school and from high school to postsecondary education;
   (vi) providing a personalized sequence of instructional content and skill development informed by the student's academic interests and learning needs that is designed to enable the student to achieve his or her individual goals and ensure he or she can graduate on time and ready for college and a career (for examples of approaches that demonstrate personalized learning, see page 13);
(B) strengthening curriculum and instruction, which may include
   (i) ensuring that high schools have the necessary courses (including teachers and materials) needed for students to graduate from high school within four years and meet college-entrance requirements;
   (ii) aligning instruction, course work and assignments in consistent fashion across classrooms to state college- and career-ready standards, including through the use of standards-based rubrics and grading;
   (iii) in high schools, increasing the availability of advanced course work, such as dual enrollment, early college, International Baccalaureate, and Advanced Placement;
   (iv) providing opportunities for students to develop higher-order thinking skills through demonstration of mastery of knowledge and skills, including through the use of performance-based assessments; and
   (v) increasing access to applied learning opportunities aligned with college- and career-ready standards, including work-based, project-based, and service learning opportunities that are implemented in partnership with employers or community-based organizations;
(C) building teacher and school leader capacity to improve student outcomes, including through
   (i) use of teacher and leader performance information for the purpose of informing professional development that provides personalized and targeted support to improve teacher practice, student learning, and school performance;
   (ii) significantly increasing professional learning opportunities including teaming, collaboration, and coaching, and opportunities for reflection on practice that is aligned with the school's comprehensive instructional program and continually evaluated to assess the impact on professional practice and student learning;
   (iii) strategies accelerate teacher effectiveness and increase teacher retention, including high-quality induction programs, sustained mentoring for teachers with fewer than two years of experience, leadership opportunities, career ladders, and financial incentives including increased salaries to attract and retain teachers in hard-to-staff subject areas or communities for teachers who commit to teaching for a minimum of three years; and
   (iv) providing teachers opportunities to earn National Board certification;

(D) increasing learning time, including through restructuring the school day, week, or year to provide expanded learning opportunities for students, including for credit recovery;
(E) assessing the use of time for teacher and administers, including assignment of responsibilities and workload, in effort to provide a fair distribution of responsibilities and provide teachers with sufficient time to plan instructional lessons, including through common planning time, and participate in effective, evidence-based professional development;
(F) providing integrated and multitiered student support services, including through partnerships with external partners, to address the social, emotional, health, and other needs facing students in and outside of school that influence student achievement, with services including but not limited to health, nutrition, mental health, housing; and family support;
(G) using technology effectively to support activities implemented in comprehensive support schools, which may include
  (i) ensuring that students develop mastery of core academic content through interactive learning opportunities that leverage technology to help support critical thinking, problem solving, collaboration, and an academic mindset;
  (ii) increasing access to advanced course work through blended and online learning opportunities;
  (iii) facilitating adaptive technology-enabled personalized learning experiences and differentiated instructional strategies that support varied student modalities and learning styles;
  (iv) regularly assessing student growth through a variety of formative assessments that can be seamlessly integrated into instructional games, software, and other online- and computer-based programs; and
(H) providing ongoing mechanisms for family and community engagement, which may include
  (v) providing information on school classes, extra-curricular activities, and other resources available to students and families in a language they can understand; and
  (vi) ensuring that parent-teacher conferences and other meetings between families/guardians and educators are scheduled during times that are responsive to family needs, and that information provided during such meetings are provided in a language that parents/guardians can understand.

Rationale: ESSA requires the implementation of "comprehensive support" in each state's lowest-performing schools, including the lowest-performing 5 percent of schools and high schools that fail to graduate one-third or more of their students. In order for such schools to improve, it is important for states, districts, and schools to have a clear understanding of what is meant by "comprehensive support."

Accountability for alternative schools

Sec. 1111(d)(1)(C); State Educational Agency Discretion

Suggested question(s)/answer(s)

1. *Are local educational agencies required to develop and implement a comprehensive support and improvement plan for a high school with a graduation rate at or below 67 percent if the high school is an alternative high school?*

   Yes.

2. *Are local educational agencies required to develop and implement a comprehensive support and improvement plan for a high school with a graduation rate at or below 67 percent if the high school predominantly serves students returning to education after having exited secondary school without a*

regular high school diploma, or who, based on their grade or age, are significantly off track to accumulate sufficient academic credits to meet high school graduation requirements?

Yes.

3. *Under what scenario may a local educational agency (LEA) not be required to develop and implement a comprehensive support and improvement plan for a high school with a graduation rate at or below 67?*

   If a high school has a graduation rate at or below 67 percent but has demonstrated consistent and sustained growth in its graduation rate over time, an LEA may not be required to develop a new a comprehensive support and improvement plan for the school. However, the LEA should monitor the performance of such a high school and develop a new plan if the school's performance stagnates.

4. *What does it mean for a student to be "significantly off track" to accumulate sufficient academic credits to meet high school graduation requirements?*

   A student should be considered to be "significantly off track" if he or she is one or more years behind in the accumulation of credits required for graduating from high schools in four years. This would include a student who has not accumulated sufficient credit after ninth grade to earn promotion to tenth grade, or a student who has not accumulated one-fourth of the total credits required to graduate by the end of ninth grade. Similarly, a student should be considered significantly off track if he or she has accumulated fewer than half of the credits needed to graduate from high school in four years by the end of tenth grade.

5. *In order for a state to permit differentiated improvement activities for high schools that fail to graduate one-third or more of their students, pursuant to Sec. 1111(C)(4)(C), what portion of a school's population should be comprised of students who have exited secondary school without a regular high school diploma, or based on their grade or age, are significantly off track to accumulate sufficient academic credits to meet high school graduation requirements?*

   At least 75 percent of a high school's student population should be comprised of students who have exited secondary school without a regular high school diploma, or based on their grade or age, are significantly off track to accumulate sufficient academic credits in order for a state to permit differentiated improvement activities.

6. *What are "differentiated improvement activities" and how might they differ from comprehensive support and improvement activities implemented in traditional high schools with a graduation rate at or below 67 percent?*

   All improvement activities should be evidence-based, informed by the indicators used within the state's accountability system, address resource inequities, and be based upon a school-level needs assessment. A high school that predominantly serves students who have dropped out of school or are over-aged/undercredited have exited secondary school without a regular high school diploma or, based on their grade or age, are significantly off track to accumulate sufficient academic credits to meet high school graduation requirements that has a graduation rate at or below 67 percent should implement evidence-based comprehensive reform to address the specific needs of the enrolled students.

These evidence-based interventions may be similar to those implemented by regular high schools and described under question 1 in this section, based on a needs assessment that analyzes the reasons that led to the student's transfer from a regular high school. In addition, interventions may be implemented that provide support to students outside of regular school hours in order for students to work or care for siblings/children as necessary. Differentiated improvement activities must provide students with equitable access to rigorous course work that prepare students for postsecondary education and the workforce.

States and local educational agencies may also take more intensive improvement actions in such high schools in comparison to regular high schools. These actions may include the implementation of interventions that addressing school-level operations, particularly in the case of high schools that consistently demonstrate very low graduation rates and are not structured appropriately to support student success, such as *virtual and other alternative high schools with consistently egregiously low graduation rates that cannot be adequately explained by the student populations they serve*.

Rationale: These recommendations aim to prevent Sec.1111(d)(1)(C), State Educational Agency Discretion, from becoming a loophole that could prevent students in very low-performing high schools from receiving support. It is particularly important to ensure accountability and support for schools meeting the criteria for "state educational agency discretion" because many such schools are alternative, charter, and virtual high schools. A recent analysis conducted by the Everyone Graduates Center at the School of Education at Johns Hopkins University finds that these high schools comprise approximately 10 percent of the nation's high schools, yet they make up more than 50 percent of high schools with graduation rates at or below 67 percent. Virtual schools, for example, make up just 1 percent of the nation's high schools but 7 percent of low-graduation-rate high schools nationwide.[6] While many of these virtual schools exist to serve vulnerable student populations, their prevalence among low-graduation-rate high schools and the degree of their low performance warrant attention. Without proper accountability and support, the students in these schools will have little chance of graduating from high school.

Direct student services—"Personalized learning approach"

Sec. 1003A(c), Direct Student Services, Local Use of Funds

Suggested questions/answers

1. *What are ways in which a local educational agency can demonstrate that students are being provided with a "personalized learning approach"?*

   "Personalized learning" is demonstrated by approaches to teaching and learning in which students

   - have trusted and caring relationships with teachers who understand their backgrounds, strengths, interests and needs;
   - receive instruction that is connected to their interests, strengths, and aspirations and aligned with the state's challenging academic standards;
   - are connected to their local community and the world beyond the classroom through real-world learning opportunities, including internships, apprenticeships, and work-based learning;
   - benefit from flexible learning environments inside and outside the classroom including one-on-one, peer-to-peer, small group and online instruction to master challenging academic content and competencies;

- receive targeted support, practice, and instruction in areas where they struggle while ensuring they learn challenging academic content and skills;
- benefit from the effective use of data and technology to enhance learning, to assess their progress individually and to guide next steps in their learning; and
- develop skills and competencies, including the ability to think critically, use knowledge and information to solve complex problems, work collaboratively, communicate effectively, learn how to learn, and developing academic mindsets.

Rationale: A local educational agency receiving a direct student support grant may use funds to support a "personalized learning approach," yet that term is not defined in ESSA. The approaches to "personalized learning" described here are derived from common elements in personalized learning work underway in a growing number of schools and districts that are showing promising results for students, particularly those who are traditionally underserved.

Direct student services—Required use of funds and providers

Sec. 1003A(e), Direct Student Services, Providers and Schools

Suggested questions/answers

1. *Is a local educational agency (LEA) that receives a grant to implement Direct Student Services required to provide tutoring?*

   No. An LEA may use a Direct Student Services grant to provide tutoring; however, it is not required to do so.

2. *May a local educational agency (LEA) provide funds to a national nonprofit organization to implement Direct Student Services?*

   Yes. An LEA may allocate Direct Student Services funding to a national nonprofit organization that has a demonstrated record of effectively supporting school improvement, expertise in effective methods of strengthening school performance, or expertise in preparing students for postsecondary education and the workforce.

Rationale: Several permissible uses of funds are stipulated under the statute (Sec.1003A(c)); however, the provisions of subsection (e), Providers and Schools, relates primarily to tutoring. This section does not include language pertaining to "required uses of funds." Therefore, ESSA guidance should clarify that LEAs are not required to use funds for tutoring. Specifically, Sec. 1003A(e)(3) of ESSA states that a state educational agency (SEA) shall "ensure that each local educational agency receiving an award is able to provide an adequate number of high quality academic tutoring options to ensure parents have a meaningful choice of services," however, the language does not require the LEA to provide tutoring. Rather, it requires the SEA to ensure that there is sufficient funding to do so should the LEA choose to provide such services.

Additionally, ESSA does not limit the type of entity that may provide Direct Student Services, therefore it should be clarified that providers may include entities that are not described under the statute, including national nonprofit organizations with demonstrated expertise in improving educational outcomes for traditionally underserved students.

Use of feeder pattern for secondary schools

Sec. 1113(5), Use of Feeder Pattern for Secondary Schools

Suggested questions/answers

1. *What steps should the local educational agency (LEA) take to inform secondary schools of the opportunity to use a feeder pattern and secure approval from a majority of secondary schools under Sec. 1113(5)?*

   An (LEA) should provide each secondary school within the LEA with

   - a comparison of the poverty rate of the school using the feeder pattern and the poverty rate of the school using the calculation selected by the LEA under Sec. 1113(a)(5)(A);
   - information on how the selection of the feeder pattern may change the secondary school's ranking as described under Sec. 1113(a)(3) and information on the likelihood that the school would receive Title I funds based on this ranking;
   - a formal and timely procedure for secondary schools to express their support or dissent for using the feeder pattern that is clear, transparent to the public, and allows sufficient time for the school to make a decision that is informed by community and families of the students attending the school; and
   - information from the first three bullets that secondary schools may use regarding the feeder pattern to inform and consult with the community and families of students attending the school.

Rationale: ESSA permits LEAs to lower the priority threshold for high schools for Title I funding from 75 percent to 50 percent and permits the use of a feeder pattern to calculate poverty. The statute requires the LEA to inform secondary schools of the opportunity to use a feeder pattern and to secure approval from a majority of secondary schools to use the feeder pattern calculation. It is important for secondary schools to (a) have the opportunity to select the feeder pattern and (b) know the poverty rate of the school as calculated under the feeder pattern and under the calculation selected by the LEA.

Community eligibility and school rankings and accountability

Sec. 1113(a)(3), School Rankings
Sec. 1111(c)(4)(C)(iii), Statewide Accountability System, Annual Meaningful Differentiation

Suggested questions/answers

1. *What should state educational agencies (SEAs) and local educational agencies (LEAs) implementing the community eligibility program (CEP) take into consideration when implementing Title I provisions under ESSA?*

   SEAs and LEAs implementing the CEP should consider the following questions:

   - If a state has chosen to make the "economically disadvantaged" subgroup synonymous with the "all students group" under the CEP, how can districts and schools accurately identify, report, and target intervention to "economically disadvantaged" students (students from low-income families under ESSA)?

- If a state has chosen to directly certify the "economically disadvantaged" subgroup, how can districts and schools account for the under-counting of students from low-income families that results from direct certification for reporting and accountability purposes?
- For the purposes of Title I funding determinations, to what extent do school rankings under the CEP differ from school rankings under the traditional free-and-reduced-price-lunch measure in districts that have schools utilizing the CEP? Specifically, are there changes in the ranking of high schools?

Rationale: ESSA guidance on the CEP from ED allows an SEA to base its reporting and accountability on using either (1) data on students who are directly certified and which may be supplemented with available survey data; or (2) data on *all* students in a community eligible school (CES), in which case the "economically disadvantaged" subgroup may be the same as the "all students group." It is unclear how CESs using the methodology under item (2) will be able to report differences in student subgroup performance between students who are economically disadvantaged and those who are not economically disadvantaged. It is also unclear if and how school rankings under Sec. 1113(a)(3) might be impacted by the CEP.

Student transitions from middle to high school and from high school to postsecondary education

Sec. 1111(g), Other State Plan Provisions

Suggested questions/answers

1. *How can state educational agencies (SEAs) demonstrate that they are supporting local educational agencies (LEAs) in implementing effective, evidence-based transitions strategies from middle to high school and from high school to postsecondary education as required under Sec. 1111(g)(1)(D)?*

   SEAs can meet this requirement under ESSA by describing how they will support LEA efforts to

   - provide school leaders, instructional and non-instructional staff, students and families with high-quality, easily accessible and timely information, beginning as early as middle school, on secondary school graduation requirements, and postsecondary education application, admissions, and financial aid requirements;
   - implement early-warning indicator and intervention systems that provide timely information to school staff and interventions to students and professional development to staff to address issues related to student attendance, course performance, and discipline incidents;
   - provide guidance on how LEAs can implement strategies that develop caring, consistent relationships between students and adults that communicate high expectations for student learning and behavior;
   - integrate information on middle-to–high school and high school–to-postsecondary education transitions into existing longitudinal data systems and statewide accountability and improvement systems; this integration should include the ability to provide middle and high schools with data on the high school and postsecondary education performance of their students (e.g., credit accumulation, remediation, and degree completion), and this data should be used to continually refine performance standards and benchmark this transition;

- increase student access to guidance counselors and provide ongoing and frequent opportunities for students to work with a school-based guidance counselor to create and monitor a graduation and transition plan, including financial planning for post-graduation; and
- create partnerships and opportunities that allow high school students to earn postsecondary education credit such as through early college high schools and dual-enrollment systems, including by providing model articulation agreements between LEAs and institutions of higher education; the level of instruction of courses that offer credits for high school and college should be of sufficiently high quality, aligned with college- and career-ready standards, and accepted by (in-state) postsecondary institutions.

Rationale: Ensuring that students receive the necessary preparation and support to make the transition from middle school to high school and from high school to postsecondary education is critical to increasing both secondary school and postsecondary education graduation rates and reducing rates of remediation. The current lack of sufficient preparation is demonstrated by the fact that 20 percent of first-year college students require remediation.[7] ESSA guidance should clarify how states can demonstrate that they are supporting districts in implementing effective, evidence-based strategies to support successful transitions to postsecondary education, including enrollment and persistence without the need for remediation.

Sec. 1112(b)(10), LEA Plan Provisions

2. *How can local educational agencies (LEAs) facilitate effective transitions for students from middle grades to high school and from high school to postsecondary education as required under Sec. 1112(b)(10)?*

   LEAs may implement a variety of evidence-based strategies to facilitate effective transitions, including the following:

   - Implement early-warning indicator systems that identify struggling students and create a system of evidence-based and linguistically and culturally relevant interventions. These systems should include indicators of student progress, credit accumulation, course performance, completion of the prerequisite courses necessary for advanced course work, disciplinary incidences, and chronic absenteeism. Mechanisms should be developed to regularly collect and analyze data about the impact of interventions on the indicators of student progress and performance.
   - Identify and implement strategies for pairing academic support with integrated services and case-managed interventions for students requiring intensive support, which may include partnerships with external partners.
   - Align the curriculum between middle and high schools and high school course work with success in credit-bearing postsecondary education course work.
   - Provide college- and career-ready pathways to postsecondary education that incorporate the integration of rigorous academics, career and technical education, and work-based learning.
   - Provide student-centered, personalized learning opportunities, including competency-based learning models and applied learning opportunities designed to increase student engagement and academic performance.
   - Provide high-quality college- and career-exploration opportunities, including college campus visits and information on in-demand industry sectors or occupations.

- Provide support and credit-recovery opportunities for struggling students, including those significantly over-aged and undercredited and those returning to school after extended absences or dropping out.

Rationale: As stated in the previous rationale, ensuring that students receive the necessary preparation and support to make these transitions is critical to increasing both secondary school and postsecondary education graduation rates and reducing rates of remediation. ESSA guidance should provide districts with examples of effective, evidence-based transitions strategies.

Sec. 1112(b)(12), LEA Plan Provisions

3. *How can local educational agencies (LEAs) coordinate and integrate academic and career and technical education (CTE) as well as work-based learning opportunities as permitted under Sec. 1112(b)(12)?*

   LEAs may develop partnerships with institutions of higher education and employers to implement pathways that prepare students for both postsecondary education and the workforce. Course work that integrates CTE and academics should include at least one core academic subject that meets college and university admission requirements. In addition, LEAs may provide students with a continuum of work-based learning opportunities that align with and reinforce academic course work, including job shadowing, pre-apprenticeship programs, and internships. LEAs may also engage employers in program design, curriculum development, program evaluation, and assessments of student work.

Rationale: Evidence demonstrates that systemic approaches to high school redesign that integrate rigorous academics, CTE, and work-based learning can increase high school graduation rates.[8] The activities described above are elements of a high-quality program design that facilitate the effective implementation of such efforts.

Teachers and students with disabilities, English learners, and rural students

Sec. 1111(g)(1)(B), Other Plan Provisions

Suggested questions/answers

1. *In state and local educational agency (LEA) plans describing how students from low-income families and students of color are not served at disproportionate rates by ineffective, out-of-field, or inexperienced teachers, and the measures used by the state to evaluate and publicly report the progress, may a state or LEA include students with disabilities and English learners?*

   Yes, a state or LEA may extend these plans to include students with disabilities and English learners.

Rationale: Research shows that students with disabilities, English learners, and students in rural areas face similar barriers to access to in-field, experienced, and effective teachers. Unfortunately, there is no requirement in ESSA for states to assess and address any disproportionality in access for these students. ESSA guidance should indicate to states that they have flexibility to extend this provision to students with disabilities, English learners, and students in rural areas, to ensure that all students have equal access to effective, in-field, and experienced teachers.

Professional development and technology

Sec. 2101(c)(4)(B)(ix), State Activities;
Sec. 2103(b)(3)(E), Local Use of Funds, Types of Activities

Suggested questions/answers

1. *What types of programs and activities will support the effective integration of technology into curriculum and instruction?*

   The following activities support the integration of technology into curriculum and instruction:

   (A) Provide ongoing, relevant, personalized professional development in the use of educational technologies to ensure every educator achieves and maintains technology literacy, including the knowledge and skills to use technology
   (i) across the curriculum for student learning;
   (ii) for real-time data analysis and online or digital assessment to enable personalized instruction; and
   (iii) to develop and maintain student technology literacy.

   (B) Provide ongoing, relevant, personalized professional development for school leaders for the purpose of
   (i) using educational technology to support the reform or redesign of curriculum, instruction, assessment; and
   (ii) leveraging data and data systems to increase student learning opportunities, student technology literacy, student access to technology, and student engagement in learning.

   (C) Train and build capacity of instructional technology coaches and/or master teachers to serve as experts among their peers and to design professional development opportunities for other teachers in the effective use of technology.

   (D) Assess the effectiveness of the professional development through regular intervals of learner feedback and data.

Rationale: According to a report by TNTP, *The Mirage: Confronting the Hard Truths About Our Quest for Teacher Development*, school systems are largely failing to help teachers understand how to improve their instruction with or without technology.[9] A report from the Alliance for Excellent Education, *Creating Anytime, Anywhere Learning for All Students: Key Elements of a Comprehensive Digital Infrastructure*, also reinforces this point by urging schools to move toward more continuous and comprehensive professional learning models as opposed to episodic, hours-based, "sit-and-get" approaches that fail to change instructional practice in meaningful ways.[10]

These findings underscore the importance of ensuring that schools and districts are designing professional development activities and programs that improve teachers' instruction and fully leverage the potential of digital learning. Regular evaluation of professional development activities is highly encouraged and ensures that funding does not continue to be used for activities with minimal impact on instructional practice.

Out-of-school access to personalized, rigorous learning experiences

Sec. 4104(b), State Use of Funds, State Activities

Suggested questions/answers

1. *Can funds available under Sec. 4103(a)(3) be used to assess and increase out-of-school broadband connectivity for the purpose of creating more equitable access to personalized, rigorous learning experiences beyond the school day?*

   Yes, identifying and addressing the types of out-of-school technology infrastructure and access available to the students served by the local educational agency (LEA) is allowable under Sec. 4104(b)(3)(C)(i)(I). Technical assistance to improve the ability of LEAs to address inequities in out-of-school internet access may include support for LEAs to

   (A) design comprehensive survey instruments to collect more in-depth information around out-of-school digital equity indicators such as
   (i) types of devices that students use to connect to the internet at home;
   (ii) how students are most often connecting to the internet if it is not available at home; and
   (iii) speed and quality of the internet connection available to students at home;
   (B) develop mobile hotspot programs that enable schools to lend out Wi-Fi enabled devices to students and families that cannot afford to pay for home internet service;
   (C) repurpose Educational Broadband Service spectrum to allow LEAs to provide broadband connectivity in communities and geographic areas that are underserved by traditional internet service providers; and
   (D) create wireless mesh networks to enable affordable internet connections in remote and rural communities.

Rationale: A report from the Consortium for School Networking (CoSN), *Digital Equity: Supporting Students and Families in Out-of-School Learning*, reveals that while at-home internet access is becoming increasingly necessary for students to fully participate in personalized learning, many students lack the access they need to reap the benefits of those experiences.[11] Research from Pew Research Center shows that more than 5 million households with school-age children lack broadband in the home, and low-income households are four times more likely to lack broadband than middle- or high-income families.[12] Additionally, 42 percent of teachers indicate that their students lack sufficient access to technology outside of the classroom.[13] Yet, more than 75 percent of school district technology leaders report that they have no strategies to address off-campus access.[14] These inequities in out-of-school internet access create significant barriers to students in low-income, underserved communities who are unable to adequately access robust digital content, complete required homework assignments, and take advantage of anytime, anywhere learning opportunities through technology when the school day ends.

Student Support and Academic Enrichment grants—Needs assessment

Sec. 4106(d), Needs Assessment

Suggested questions/answers

1. *What are the components of an effective needs assessment to examine access to personalized learning experiences supported by technology under Sec. 4106(d)(1)(c)?*

   A needs assessment used to evaluate access to personalized learning experiences supported by technology must be comprehensive, evidence-based, and focus on

   - curriculum, instruction, and assessment;
   - personalized professional learning;
   - use of space and time;
   - data and privacy;
   - community partnerships;
   - technology and infrastructure; and
   - budget and resources.

Rationale: Implementing meaningful digital learning opportunities requires more than just purchasing devices for a school district. It requires thoughtful planning, preparation, and analysis of student outcomes, teacher development, school culture, and leadership. According to a research synthesis completed by ED, entitled *Characteristics of Future Ready Leadership*, districts must systemically plan and implement in a variety of key areas to ensure success. To ensure a successful implementation, a comprehensive approach with a systemic action plan must be in place *before* districts make their next technology purchase. To this point, Future Ready Schools (FRS), a project of the Alliance for Excellent Education, created the FRS Dashboard, a free, systemic action planning tool for school districts, built upon the research-based FRS Framework. Used by more than 900 school districts in the first year of existence, this tool is research-based, and provides rubric-based metrics, a customized gap analysis, recommended strategies to close the identified gaps written by successful practitioners, and a robust action planning tool so that district leaders have a detailed, step-by-step process to ensure successful implementation.

Student Support and Academic Enrichment grants—Technological capacity and infrastructure

Sec. 4109(a), Use of Funds

Suggested questions/answers

1. *Can Sec. 4109(a) funds be used to create a systematic implementation plan for "building technological capacity and infrastructure"?*

   Yes, a systematic implementation plan for "building technological capacity and infrastructure" that considers the availability of community partnerships, protecting and sharing data, digital infrastructure available, and sustainability of programming is allowable under Sec. 4109(a).

Rationale: A report from the Alliance for Excellent Education, *Creating Anytime, Anywhere Learning for all Students: Key Elements of a Comprehensive Digital Infrastructure,* urges that adequate broadband access and digital tools be accompanied by a comprehensive "digital infrastructure" that unlocks the potential of technology to enhance student learning.[15] The report adopts a broader definition of digital infrastructure that includes professional learning, changes in pedagogy, parent and community engagement, and assessment and data systems.[16] This notion of a digital infrastructure is also supported by the Aspen Institute's report on student-centered learning in a digital world.[17]

Student Support and Academic Enrichment grants—Dropout prevention

Sec. 4108(5)(C)(vi), Activities to Support Safe and Healthy Students

Suggested questions/answers

1. *What examples of evidence-based strategies and activities can be used to improve school dropout and re-entry programs?*

   See answers to questions 1 and 2 in "Comprehensive support and improvement" section on pages 9–11.

Teacher certification and licensing

Title II, Sec. 2101(c)(4), State Activities

Suggested questions/answers

1. *What are some components of an effective state system of teacher certification and licensing?*

   State systems of certification and licensing should be based on whether a teacher demonstrates the knowledge and skills necessary to provide a classroom environment that fully prepares students to meet grade-level challenging state standards. Further, the Equity and Excellence Commission recommends that states "set a uniform entry 'bar' into the profession that includes in-depth academic preparation, diverse clinical experiences and excellent performance on a licensing assessment that measures subject matter knowledge."[18] Licensure should "reflect the complexity of the work and include standards and rigorous performance assessments, set nationally, of actual ability to teach" while also increasing the "selectivity and effectiveness of teacher training and hiring."[19]

   Certification and licensure should be awarded once candidates demonstrate their ability to provide applied learning opportunities and the development of higher-order thinking skills.[20] One means by which states can ensure this level of rigor is to require that all teacher-preparation programs, alternative and traditional, are aligned with the CAEP standards.[21] The purpose of these standards is to advance excellent educator preparation through evidence-based accreditation that assures quality, supports continuous improvement, and raises the bar in educator preparation.

Rationale: Student achievement is "influenced by both teacher content background (such as a major or minor in math or math education) *and* teacher education or professional development course work, particularly in how to work with diverse student populations (including limited-English–proficient students and students with special needs)."[22] Several states have taken action to strengthen their licensing requirements. For example, Connecticut certification requires candidates to have a major in the content

area taught; additional pedagogical training, including literacy instruction and working with students with special needs; and be able to pass of a basic skills and content test before entry to teaching.[23]

Connecticut also eliminated emergency licensing, toughened requirements for temporary licenses, and requires teachers to complete a master's degree and a rigorous performance assessment modeled on that of the National Board for Professional Teaching Standards to gain a professional license.[24] Likewise, North Carolina increased course work in content and pedagogy, as well as licensing tests, for teachers to meet licensing requirements and required schools of education to undertake professional accreditation.[a] [25]

Finally, New York added "Educating All Students," an assessment focused on equity. Specifically, it assesses the degree to which a New York State educator understands the characteristics, strengths, and needs of all student populations and effectively uses knowledge of diversity within the school and the community to address the needs of all students, to create a sense of community among students, and to promote students' appreciation of and respect for all students in their diversity.[26]

Teacher performance assessments

Title II, Sec. 2101(c)(4), State Activities

Suggested questions/answers

1. *What are examples of an effective "teacher performance assessment"?*

   Examples of an effective teacher performance assessment (TPA) include the validated TPA developed by Education Testing Service (ETS) as well as edTPA developed by the Stanford Center for Assessment, Learning, and Equity (SCALE) in partnership with the American Association of Colleges of Teacher Education (AACTE). edTPA, a rigorous, validated, standards-based performance measure, similar in design to the National Board for Professional Teaching Standards, captures critical dimensions that research shows are linked to teacher effectiveness and student learning in each of its twenty-seven certification area versions. The edTPA process illuminates how well prospective teachers are able to engage learners, assess students' current knowledge and skill development, and provide feedback to students to enable them to develop increased independence and skill in directing their own learning.

Rationale: Beginning in 2009, thousands of teacher educators and P–12 teachers provided input into edTPA's development led by SCALE in partnership with AACTE. More than 430 campuses in twenty-nine states are using edTPA to determine if teacher candidates are ready to teach. Many of these states took action to adopt associated licensure and program accreditation policies, including California, Delaware, Georgia, Illinois, Iowa, Minnesota, New York, Oregon, Tennessee, Washington, and Wisconsin.[27] Analyses of more than 18,000 candidates who participated in edTPA during 2014, its first full operational calendar year, provides compelling evidence supporting edTPA's intended use as a measure of readiness to teach and an indicator for informing program accreditation.[28]

[a] In addition, "[b]oth states also developed mentor programs for beginning teachers that extended assistance and assessment into the first year of teaching, and both introduced intensive professional development for veteran teachers. A recent study of North Carolina's reforms notes the strong quality of teachers in the state as a whole and in schools serving diverse student populations" (L. Darling-Hammond and G. Sykes, "Wanted.")

Teacher shortages and recruitment

Title II, Secs. 2101(c)(4) and 2103(b), State and District Activities

Suggested questions/answers

1. *What questions should states and local educational agencies (LEAs) examine when assessing the extent of teacher shortages?*

   States and LEAs should conduct a comprehensive assessment of student access to experienced, in-field, and effective teachers, including an analysis of resources and enacted programs available to increase access, and additional data to measure the progress of such efforts and their impact on student access to experienced, in-field and effective teachers. This should include within school and across school data. States should be encouraged to expand this data to include access for students with disabilities and English learners in addition to students of color and students from low-income families. There should be continual and ongoing assessment based on the following questions:

   - Where are there shortage areas (including school and grade levels, and subject area, such as STEM [science, technology, engineering, and mathematics], special education, and bilingual education)?
   - How are teachers distributed by license/certification area (e.g., emergency, provisional, full, permanent, etc.)?
   - Are teachers assigned to a classroom within the area of their certification/license?[b]
   - Based on the state's teacher performance evaluation and improvement system, how are teachers distributed across districts, schools, grades, and subject areas by rating?
   - For teachers not captured by the state's performance evaluation system, such as those in their first years of teaching for whom there is no rating or insufficient data,

     (a) from what pre-service programs are teachers being recruited?;
     (b) did the program provide clinical or residential experience?;
     (c) how did the teachers perform on a teacher performance assessment (TPA)?; and
     (d) is a TPA score required?
   - What are teacher retention rates (by district, school, and grade levels, and subject area)?
   - What are the teacher transfer rates (including within the district)?
   - What percentage of teachers are National Board–certified (district, school, and grade/subject-area levels)?[29]
   - Are there efforts to recruit from teachers and leaders from diverse backgrounds?

[b] In high schools with a student population that is at least half African American, 25 percent of math teachers do not have a college degree in math and are not certified to teach math. For predominantly white schools, this figure is 8 percent (U.S. Department of Education, National Center for Education Statistics, "Status and Trends in the Education of Racial and Ethnic Groups," NCES Publication No. 20100015, 2001, http://nces.ed.gov/pubsearch/pubsinfo.asp?pubid=2010015 (accessed January 3, 2014)).

2. *What are effective strategies for improving teacher recruitment efforts?*

   There are several effective strategies for improving teacher recruitment efforts. Offering competitive starting teacher salaries is one action by which to attract and retain teachers to a particular district. Increasing the starting salaries for teachers improves a school's ability to attract high-quality teachers, particularly for schools serving large numbers of students from low-income families. For example, market research demonstrates that raising a teacher's starting pay from $37,000 to $65,000, and top salaries from $70,000 to $150,000 (combined with increased investments in school leadership and working conditions), would "lift the percentage of new teachers in high-poverty schools coming from the top third of their academic cohort from 14 percent today to 68 percent and would cost about 5 percent of current K–12 spending."[30]

   In addition, long-term financial incentives, such as scholarships and loan forgiveness, provide additional support to teachers who want to work in schools serving students with the greatest needs and are burdened by student loans. Scholarships or loan forgiveness should be targeted to areas of teaching shortages or to teachers who serve in high-need schools for a minimum of four years.[31] State and district should also implement efforts to hire and place teachers in a classroom position at least one month prior to the start of the school year. More than one-third of new, young teachers are hired after the start of the school year.[c] This practice increases the likelihood that a teacher will be placed outside of their certification area in last-minute efforts to fill open positions. This often prevents these teachers from participating in professional development or planning time that is provided to staff prior to the start of the school year.

Rationale: A growing number of states and districts are implementing strategies to improve recruitment, hiring, and placement efforts.[32] For example, Philadelphia, Pennsylvania, and Toledo, Ohio, revised their notification and assignment policies, as well as their interview-team selection criteria and candidate screening tools. Illinois passed the Grow Your Own Teacher Act to strengthen the pipeline into teaching. Chicago implemented the Golden Teachers New Teacher Induction and Mentoring Program. San Diego, California, streamlined and sped up its hiring process by putting the entire system online, improving its capacity to manage hiring data, vacancy postings, and interviews. Educational leaders in South Carolina created the Call Me MISTER initiative to increase the pool of talented and diverse educators, namely African American males. The program provides tuition assistance through loan forgiveness and assistance with job placement.[33]

Teacher residency programs

Title II, Secs. 2101(c)(4) and 2103(b), State and District Activities

Suggested questions/answers

1. *What are critical components of an effective "clinical residency experience"?*

   An effective clinical residency experience is aligned with the grade level and subject area where the teacher or leader will be placed upon program completion and provides opportunities to develop the

[c] HGSE News, *New Research Finds School Hiring and Support Practices Fall Short* (Cambridge, MA: Harvard University, 2003). This study finds that of these teachers, sampled across four states, only 23 percent had a reduced load; 56 percent received no extra assistance; and 43 percent went through the first year with no observations from a mentor or more experienced teacher.

capacity to (1) link teaching practice to student learning; (2) create effective teaching units and lesson plans that provide all students with the ability to apply content knowledge, think critically, solve complex problems, communicate effectively, and work collaboratively with their peers; (3) develop and implement formative and interim assessments to diagnose student learning and modify instruction as a result of the data derived from such assessments; (4) implement evidence-based differentiated instruction strategies; and (5) teach diverse learners, including students with special needs and English learners."

Rationale: Teacher residency programs create a pipeline of effective teachers who remain teaching in high-need schools, raising their effectiveness.[34] Individuals who enter the classroom without student teaching leave the field at rates twice as high as those who have completed student teaching,[35] and those who enter the classroom without preparation in instructional methods, child development, and learning theory leave at rates at least double those for teachers who have had such training.[36] Overall, teachers receiving a more comprehensive package of these induction components achieve higher levels on teachers' job satisfaction, commitment, and retention; teachers' classroom teaching practices and pedagogical methods; and student achievement. Beginning teachers reporting that they have a mentor or master teacher working with them during their first year increased from about 50 percent in 1990 to more than 90 percent as of 2008.[37]

Many states and districts are investing in providing residency, induction, or mentoring opportunities for new teachers to improve retention and capacity. For example Cincinnati, Columbus, and Toledo, Ohio,[38] have reduced early new teacher attrition rates by more than two-thirds by providing expert mentors to new teachers during their first year.[39] The Boston Teacher Residency master's program recruits college graduates, career changers, and community members to work in Boston Public Schools. Students spend a full academic year in a BPS classroom, teaching alongside an experienced mentor and applying theory to practice through rigorous course work. Their commitment earns them a master's degree in education from the University of Massachusetts Boston, a Massachusetts Initial Teacher License, and credit toward a dual license in special education.[40] The Denver Teacher Residency program allows candidates to teach and learn alongside a mentor teacher in a Denver, Colorado, public school classroom for a full academic year, while pairing this experience with earning a master's degree from the University of Denver's Morgridge College of Education. Residents receive data-driven instructional support and training in elementary or secondary education to best serve Denver Public Schools' highest-need students.[41]

School climate and working conditions

Title II, Secs. 2101(c)(4) and 2103(b), State and District Activities

Suggested questions/answers

1. *What are effective strategies for improving teacher and leader working conditions?*

   Strategies for increasing support for teachers and improving school climate[42] includes the following:

   - Increasing opportunities for teachers to participate in professional learning communities or other opportunities for collaboration. These opportunities should align with the challenging state academic standards and enable teachers to master new content, pedagogy, and learning tools and incorporate them in their practice. This may include rethinking the traditional school schedule to give teachers more freedom and creativity in their professional practice to individualize their teaching, collaborate with colleagues, use data to better assess students' progress and needs, and

plan lessons accordingly.[43]

- Increasing the number of support staff, such as guidance counselors, social workers, and appropriately trained paraprofessionals and assistants to support student achievement.
- Using school climate data, such as data submitted for ED's Office for Civil Rights Data Collection; student referral data;[d] and student, staff, and family survey data to strengthen relationships between staff, and between students and staff, and target professional development to strengthen classroom practices that engage and support students.
- Implementing equitable and effective approaches to school discipline (see the recent joint school discipline guiding principles and accompanying documents issued by ED and Department of Justice for specific strategies).[44] For example, strategies such as Restorative Justice and Response to Intervention demonstrate effective approaches to addressing student behavior in a positive and inclusive way.
- Redesigning career pathways for teachers so that recognition (and compensation) for accomplishment does not require leaving the classroom; so that collaboration among teachers is promoted;[45] and teachers have a greater role in school improvement efforts.
- Providing opportunities for teachers to develop culturally relevant competencies and strategies for teaching diverse learners. Staff must combine deep content knowledge and the skills to accelerate student learning with cultural competence and the ability to foster excellence in students of multiple cultures and ethnicities.[46] Efforts to recruit more diverse candidates should be paired with professional development that supports culturally relevant pedagogy and working in diverse communities. Numerous studies demonstrate the positive impact that culturally responsive teaching can have on strengthening teacher-student relationships and improving student engagement and outcomes.[47]
- Investing in strong and consistent leadership by improving the principal pipeline, including hiring those who have experience building capacity and organizing time and structures to facilitate adult and student learning.[48] Just as with teachers, this effort regarding principals should include a close look at preparation, performance, and compensation, especially in high-need schools and districts.[49]
- Implementing a valid and reliable school climate survey. Approximately twenty states use the Teaching, Empowering, Leading and Learning (TELL) survey, developed by New Teacher Center to assess conditions related to time, facilities and resources, professional development, school leadership, teacher leadership, instructional practices and support, managing student conduct, community support and involvement, and new teacher support for early-career teachers.[50] States use the findings for multiple purposes, including improving school climate; principal evaluation and leadership training; and school improvement planning.
- Adopting the Teacher Working Conditions Standards.[51]

Rationale: Teacher surveys consistently show that working conditions are a critical factor in teacher

[d] For example, during SY 2010–11, Charlotte-Mecklenburg School District looked at issues of disproportionality, including that of the representation of African American males in special education classes. One key outcome of that investigation was the development of a semester-long course for responsiveness to intervention (RTI) coaches focused on struggling male students, with particular attention devoted to the needs of African American males. This course evolved into a one-day course for teachers. There is also a two-day version of the teacher course available during summers (see "Equity at the Core," *Strategies* 16, no. 1 [fall 2013], http://ucea.org/storage/pdf/16_01_2013.pdf (accessed January 4, 2014)).

decisions to change schools or leave the profession, including how teachers view administrative support, available education resources, teacher input in decisionmaking, and school climate.[52] When teachers feel supported by both the principal and their peers, they are more committed to their profession.[53] A positive school climate is also associated with the development of teachers' beliefs that they can positively affect student learning.[54] Research demonstrates that school climate[55] enhances or minimizes teacher/staff emotional exhaustion, depersonalization, and feelings of low personal accomplishment[56] as well as attrition.[57]

Teacher and leader evaluation systems

Title II, Secs. 2101(c)(4) and 2103(b), State and District Activities

Suggested questions/answers

1. *What are some components of an effective teacher and leader evaluation system that build teacher capacity to provide instruction that is aligned with challenging state standards?*

   Components of an effective teacher and leader evaluation should be provided annually include

   (1) three or more evaluation categories (e.g., emerging, effective, etc.);
   (2) student achievement measures, including growth;
   (3) student learning objectives as a measure;
   (4) observations that include a post-observation feedback or a conference;
   (5) an explicit policy for non-tested grades and subjects;
   (6) a system to ensure professional development is designed/assigned based on individual evaluation results for all teachers and include an improvement plan;
   (7) student and family surveys; and
   (8) effective evaluator training.

Endnotes

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