



DEMOCRATS
for EDUCATION REFORM



State Fiscal Stabilization Fund
Docket ID: ED-2009-OESE-0007

August 27, 2009

Office of Elementary and Secondary Education
(Attention: State Fiscal Stabilization Fund Comments)
U.S. Department of Education
400 Maryland Avenue, SW
Room 3E108
Washington, DC 20202

Secretary of Education Arne Duncan:

As you know, the undersigned organizations have longstanding commitments to improving the quality of public schools for all children. Our special focus, though, is on schools that are too often overlooked in general improvement efforts: those serving large numbers of low-income students, English-language learners, and students of color. We write together today because of our collective conviction that the American Recovery and Reinvestment Act (ARRA) provides an unprecedented opportunity to reinvigorate and refocus the school improvement effort in America. Done right, ARRA-financed initiatives can build on recent momentum at the elementary level by removing ambiguity about the aims of high school education, shaking an often complacent system out of its comfort with mediocre results, and elevating the most ambitious and effective reforms aimed at placing the needs of children—especially the most vulnerable—ahead of the privileges and prerogatives of adults.

We have no doubt that both Congress and the Administration are committed to doing this right. The ARRA legislation itself and the draft regulations are unequivocal in their focus on aligning K-12 expectations with the demands of post-secondary and the workforce and ensuring that both educators and the public more generally have good, honest, useful information on progress toward those goals. We wholeheartedly applaud your absolute clarity on the need to put the closing of long-standing gaps in achievement at the center of this effort. Your clear understanding that the most important gap-closing strategy is to focus like a laser on dramatically improving the effectiveness of those teaching low-income students and students of color, and your insistence that, to do any of this well, state data systems must link students to the teachers who teach them are exactly on target.

None of us underestimate, though, how hard it is to reorient big, lumbering, multi-layered systems like ours. And it is especially hard when times are tough. As we spend time in schools

and districts around the country, we see the effects of big budget cuts—decimated educational services and deeply damaged employee morale. In times like these, the pressure to use any and all available funds simply to fill in budget holes and ease pain is overwhelming.

But the temptation to use State Fiscal Stabilization and Race to the Top funds to “get things back to normal” must absolutely be resisted. A report issued in April by McKinsey & Company shows that *not* pursuing education reform may be the most costly decision of all. An economic analysis found that closing achievement gaps could raise gross domestic product (GDP) on the order of 2-4 percent. Any increase in GDP would mean an increase in revenues could then be reinvested in schools, toward continued economic recovery.

A study released in February by the Center for Reinventing Public Education found that economically illogical policy decisions are both costly *and* work against the aims of pursuing education excellence for all children. The report showed that if teacher layoffs were made on the basis of effectiveness, rather than on seniority—as is the case in virtually every school district in the country—there would be significant cost savings, layoffs would be reduced by about one-third, and the proportion of effective teachers in the active teaching force would be increased substantially.

These tough financial times present a singular opportunity to break with the past, shed old and ineffective policies, and forge new ones that use available dollars far more effectively and simultaneously drive toward the goals of better prepared students and a stronger and more vibrant economy. But this is only possible if all involved reject half measures and business-as-usual solutions and instead keep our eyes on the only prize that really matters—what’s right for students, especially the most vulnerable.

The regulations that govern distribution and use of dollars have to meet a far higher standard than is necessary in easier times. Though most will never say so, even the most focused and courageous state and local leaders will need the extra leverage that comes only from tough process and performance metrics if they are to act swiftly and stay true to the goals of this Act over time—metrics that give them no other choice but to address even the toughest issues and that give state and local advocates honest information to hold education leaders accountable for progress.

In four critical cases, we think the proposed regulations for the State Fiscal Stabilization Fund (SFSF) and Race to the Top Fund (RTTT) fall short of meeting that standard. In the detailed comments appended to this letter, we provide suggestions for how to improve them. We also provide three suggestions for better structuring the Race to the Top application to ensure that, in implementation, the law retains the focus and power that we believe the Administration and Congress intended it to have.

State Fiscal Stabilization Fund and Race to the Top Fund Reporting Metrics

1) Teacher Effectiveness

The regulations for both SFSF and RTTT are clearly designed to give state and local leaders the leverage they need to do something that most of them have known they needed to do for a long time: get serious about teacher quality, especially in high-poverty and high-minority schools. Because a thoughtful evaluation process is at the heart of *any* effective organizational improvement strategy, you have rightfully focused a lot of energy there, “outing” the meaningless results of current evaluation systems (in which 99.5 percent of teachers are above average) and helping to ensure that decision-makers have the data they need to include impact on student learning as a central element of their evaluation and improvement efforts.

The problem, though, is that even districts and states that move swiftly to build the necessary information systems and overhaul their evaluation processes are many years away from having sound systems that will routinely produce the kind of data necessary to measure whether the kids who are at the heart of federal policy—poor and minority kids—have the effective teachers they need to catch up with their peers. So unless we want them to delay attending to this issue until the systems and the data are perfect, we need a set of “good enough” measures that will help send up the alert and prompt action to make sure our most vulnerable children don’t continue to be taught by disproportionate numbers of not-good-enough teachers.

That is why—in addition to its drive toward effectiveness in growing student learning as the heart of teacher policy—the ARRA also requires states and districts, as does NCLB itself, to work to assure that low-income and minority students are not taught disproportionately by “inexperienced, out-of-field, or unqualified” teachers. These, of course, are not perfect proxies for effectiveness. But ample research tells us that teachers, like other professionals, aren’t as good in their first year as they will eventually become, that students learn most from teachers who know their subjects, and that teachers who know the subject which are teaching are more effective than those who don’t.

In truth, the three indicators that are actually in the law offer far better data for assessing equitable access to quality teachers than the wildly inflated ratings resulting from current teacher evaluation systems. Again, we applaud your effort to unmask bad evaluation systems by requiring those ratings to be publicly reported, but we strongly disagree with the claim that in the short term those data will offer any valuable information on equitable distribution of effective teachers. In fact, we believe that, much like the almost meaningless “highly qualified” designation, this information will cloud rather than clarify issues of equity and mislead parents and the public into thinking we no longer have any inequities in access to quality teachers.

After eight years of an Administration that did nothing to prompt attention to or action on the problem of poor quality teachers in high-poverty and high-minority schools, we are sure that

you don't want—even in the interest of better systems long-term—another eight years of inaction on this pressing problem. The regulations, then, need to reflect the law.

2) Struggling Schools

As we look closely at the data on what has happened to the lowest-performing schools over the past three to five years, two things are clear. First, as you have said so clearly, a lot of those schools are stuck. Students aren't learning much, and nothing seems to be changing. But second, and perhaps more relevant here, they are not stuck because no one knows what to do. In virtually every state whose data we have examined, at least a quarter of the schools that were among the lowest performing several years ago—most of them serving large numbers of poor and minority children—are now among the highest gaining in their respective states. What this means for us is that your demand for action is on the mark. There are, however, two serious problems with the proposed metrics.

- By focusing the metrics only on the interventions made, rather than requiring reporting of subsequent student achievement results, there is a very big danger that ARRA will reinforce an already pronounced tendency in education to count everything except results. Putting new leadership in place or re-staffing a dysfunctional school is the beginning, not the end, of the school improvement process.
- By focusing targets on percentages of schools in federal program improvement status, the numbers of which vary wildly across states, the regulations:
 - a) Compel action on far fewer schools than the Department's public pronouncements suggest;
 - b) Reward states that have gamed their NCLB accountability systems with too light a burden (five or fewer schools over four years for many states), imposing far heavier burdens on those that have played it straight; and
 - c) Leave out many of the lowest performing high schools, including many so-called "dropout factories." (We appreciate that Department staff sought a fix for the high school problem, but we don't think it is adequate.)

3) Curriculum and Other Supports for Teachers

We are delighted at the recent progress toward common standards that remove ambiguity about the central goal of high school: college and career readiness for all students. And we applaud your commitment to investing in helping states develop high-quality assessments to match these new standards.

But if we have learned anything from the past decade of "standards-based" reform, it is this: Better standards and better tests aren't enough. Like their counterparts in most other developed countries, our teachers need curriculum that will help guide them in what to teach, in the kind of lessons and assignments that will enable students to reach standards, and in what student work that meets standards actually looks like. Last time around, the federal

government left this to states and the states left it to districts. Given the limited capacity of the vast majority of school districts, that left most teachers struggling to figure things out for themselves.

Trying to intuit what they should teach from tests has left most teachers frustrated, angry, and just plain tired. After a long day of teaching and an evening spent grading homework, demanding that they also make up from scratch high-quality lessons that will engage and challenge each and every one of their students has proven to be just too much. The result for too many kids, especially those who are poor or minority, has been a series of low-level assignments and a lot of repetitive drill—hardly a recipe for high achievement.

Ideally, you would increase the amount of funding available to states that want to work together on quality assessments, and make certain that it was used to develop not just end-of-year assessments, but also high-quality curriculum, lessons, anchor assignments, and rubrics, as well as the interim and diagnostic assessments that teachers have been demanding. Short of that, at the very least, states that apply for RTTT should be asked to spell out their plans in each of these areas, as opposed to the rather generic request in the proposed regulations.

Despite what is often said about “tests worth teaching to,” another decade of teaching to tests will not get us where we need to go as a country. This is too important to be left to chance.

4) Standards, Assessments, and Other Indicators of College and Career Readiness

The proposed SFSF indicators under the standards and assessments umbrella focus almost exclusively on assessment. Because of ongoing work among states to transition toward new, common, internationally-benchmarked standards aligned with college- and career-ready expectations, it is understandable that the regulations would not include indicators related to standards outside of that effort.

That said, much like the dilemma with teacher effectiveness data cited above, the danger here is that while they await the inevitably long process of developing common standards and assessments, and the even longer process of getting them adopted, states won't take the immediate steps they could take to help more of their students get college and career ready—which is about more than passing a state test, anyway.

Fortunately, there are some fairly simple indicators of state action to increase college and career readiness that can be added, including information on the proportion of students taking a college- and career-ready course of study in high school and the proportion taking existing tests of college readiness.

Race to the Top Fund Application Structure

In our RTTT comments (submitted separately), we make three suggestions that we believe will improve the likelihood that the Race to the Top initiative will produce real change:

1. *Assure a stronger focus on equity by (a) asking states not just about the amount of funding in education, but also about the fairness of its distribution to high- and low-poverty and high- and low-minority districts and schools, and (b) asking states to document their efforts (required under federal law) to address gaps in teacher quality between high- and low-poverty and high- and low-minority schools.*
2. *Ensure that higher education does its part by including a sign-off from the state's chief higher education officer (or CEO of the public university system) on the application. "College-ready" standards and assessments, for example, won't mean anything to anybody unless higher education endorses them and uses their results to signify readiness for credit-bearing coursework. Similarly, teachers need to be prepared to teach to the new standards and to use the new tools—and most of that preparation is still done in higher education. They need some skin in the game, too.*
3. *Bolster the evidence of progress in raising achievement and closing gaps requested of states.* The proposed measure of achievement, the National Assessment of Educational Progress (NAEP), is a valuable measure of state progress. But especially because there are no state NAEP results at the high school level, NAEP alone is not enough to provide any assurance that the state has a demonstrated record of accomplishment at all levels that extends beyond process. A public analysis of progress—or lack thereof—on state assessments is also important.

Perhaps it should go without saying, but we will say two more things anyway. The rigor of the review process for these applications is absolutely central to maximizing impact. And, while they might feel rigid and burdensome at first, tight performance contracts will actually provide more leverage to state leaders than loose ones.

We believe that the proposed regulations represent a strong and good-faith effort by this Administration to face head-on some of the toughest and most important education issues confronting America today. We hope the attached recommendations are helpful as you work to refine the regulation to ensure that ARRA-supported initiatives drive meaningful and powerful change for students.

Cordially,

Cynthia Brown, VP for Education Policy, Center for American Progress
Kati Haycock, President, The Education Trust
Joe Williams, Executive Director, Democrats for Education Reform
Ellen Winn, Director, Education Equality Project

State Fiscal Stabilization Fund Comments

Achieving Equity in Teacher Distribution (Section (D)(a))

We strongly agree with the Administration that effective teachers, especially for low-income and minority students, are the key to improving student outcomes and closing the achievement gap. However, the assurance indicators and descriptors related to “achieving equity in teacher distribution” fail to address the full set of statutory requirements under that assurance.

The assurance specifically requires that “the State will take actions to ... comply with section 1111(b)(8)(C) of the ESEA ...” (ARRA-Sec.14005(d)(2)). In turn, that section of the ESEA requires States to describe “the specific steps that the State educational agency will take to ensure that poor and minority children are not taught at higher rates than other children by inexperienced, unqualified, or out-of-field teachers, and the measures that the State educational agency will use to evaluate and publicly report the progress of the State educational agency with respect to such steps.”

The law is clear enough to provide sufficient direction: two assurance descriptors and one assurance indicator can be added, using language that emerges directly from the ESEA:

First, add a new assurance descriptor numbered “Descriptor (a)(1),” and renumber the other descriptors accordingly. Descriptor (a)(1) should read:

Descriptor (a)(1). Describe the specific steps that the State educational agency has taken and plans to take to ensure that poor and minority children are not taught at higher rates than other children by inexperienced, unqualified, or out-of-field teachers.

Second, add a new assurance descriptor numbered “Descriptor (a)(2),” and renumber the other descriptors accordingly. Descriptor (a)(2) should read:

Descriptor (a)(2). Describe the measures that the State educational agency uses and plans to use to evaluate and publicly report the progress of the State educational agency with respect to the steps in assurance descriptor (a)(1), including the definitions the State has established to measure, analyze, and report data on ‘inexperienced teachers,’ ‘unqualified teachers,’ and ‘out-of-field teachers.’

Third, add an assurance indicator numbered “Indicator (a)(2)” and renumber other indicators accordingly. Indicator (a)(2) should read:

Indicator (a)(2).

- a) Provide, for the State and for each LEA in the State, the number and percentage of teachers in high-poverty and low-poverty schools (separately) who are out-of-field, inexperienced, and uncertified (separately)
- b) Provide, for the State and for each LEA in the State, the number and percentage of teachers in high-minority and low-minority schools (separately) who are out-of-field, inexperienced, and uncertified (separately)

Finally, we propose that just as with all of the other assurance indicators, any State that cannot report Indicator (a)(2) above must describe in their State Plan, “the State’s process and timeline for developing and implementing, as soon as possible but no later than September 30, 2011, the means to fully collect the data or information” and its process and timeline “to fully report the data or information.”

We recommend adding the following definitions:

High-poverty school means a school in the highest quartile of schools in the state with respect to poverty level, using a measure of poverty determined by the state.

Low-poverty school means a school in the lowest quartile of schools in the state with respect to poverty level, using a measure of poverty determined by the state.

High-minority school means a school in the highest quartile of schools in the state with respect to the percent of students that are minority.

Low-minority school means a school in the lowest quartile of schools in the state with respect to the percent of students that are minority.

Improving Collection and Use of Data (Section (D)(b))

Statewide Longitudinal Data System Elements

We support the acknowledgement of data’s critical role in national, State, and local efforts to raise achievement for all, close achievement gaps, and ensure that all young people graduate from high school prepared for college and careers. It is crucial that the information States

provide about which of the 12 data elements described in the America COMPETES Act are currently included in their statewide longitudinal data system is accurate and complete.

In its work to assess the status of Statewide longitudinal data systems, the Data Quality Campaign (DQC) has learned that it is important to ask States more than simply whether they have an element or not. Building off of this work will both help ensure accuracy in State information and contribute to the Administration’s stated goal of minimizing State reporting burden.

We recommend a reporting form for indicator (b)(1) that is pre-populated with State responses to selected questions from the most recent DQC survey. This reporting form can be found in **Appendix A** of this commenting document. (Note: The element numbering in the attached reporting form aligns with the America COMPETES numbering rather than the DQC numbering.) Additional questions are necessary to assess State status on post-secondary specific America COMPETES elements 11 and 12; these have been proposed in the reporting form.

Definition and Availability of Data on Student Performance Including Estimates of Individual Teacher Impacts

We support efforts to ensure that educators and leaders are provided with information about the impact of individual teachers on student achievement. These data have the potential to help improve both policies and practices around professional development, evaluation, teacher assignment, compensation, and other efforts to support and grow effective teachers and ensure that low-income students and students of color have access to their fair share of the most effective teachers.

To ensure that this potential is realized, however, it is critical that these data be provided not only to the teachers themselves, as currently stated in indicator (b)(2), but to principals and district administrators as well.

We propose the addition of a new indicator numbered Indicator (b)(3). Indicator (b)(3) should read:

Indicator (b)(3). Indicate whether the State provides principals and superintendents with estimates of individual teacher impact on student achievement for those teachers of reading/language arts and mathematics in grades in which the State administers assessments in those subjects in their schools and/or districts.

Moreover, it is critical that the Administration provide a clear and specific definition for the term “estimates of individual teacher impact on student achievement” in the Definitions section. Because the proposed requirement applies to “teachers of reading/language arts and mathematics in grades in which the State administers assessments in those grades,” we assume that the intent is to provide data on teacher impact on student achievement on the statewide assessments

required under the Elementary and Secondary Education Act (ESEA). We support such a definition and recommend that it be included explicitly in the Definitions section. This clarity is especially important to avoid confusion between this estimate and the definition of “student achievement outcomes” as relates to teacher and principal evaluations, which includes indicators such as student grades and on-track rates, both of which yield important information but do not lend themselves to estimations of individual teacher impact on student learning.

Standards and Assessments (Section D(c))

Because States will be transitioning toward a set of new common standards and assessments, it is understandable that the Administration would not want to create metrics that encourage States to raise their standards and levels of assessments outside of that effort. However, indicators (c)(1) and (c)(2), which ask States to confirm the approval status of their current assessment system and discuss whether they have engaged in activities to enhance the quality of their current assessments, will not provide the public any meaningful information that will spur broader attention to college and career readiness. We therefore propose that those two indicators be replaced with two indicators of college and career readiness—an area that, as the Administration has noted, needs more attention and State action.

Replace indicators (c)(1) and (c)(2) with the following:

- Indicator (c)(1). Indicate whether the State requires that all students successfully complete a full college and career ready course of study, one aligned to entrance requirements for the State’s public colleges and universities, in order to graduate from high school. If not, does the State:
- Plan to establish such a requirement before September 30, 2011?
 - Require reporting on the school report card the percentage of students, by student subgroup, that has successfully completed a full college and career ready course of study?
- Indicator (c)(2). Indicate whether the State requires that all students take the ACT, SAT, or other assessment of college readiness. If not, does the State:
- Plan to establish such a requirement before September 30, 2011?
 - Require reporting on the school report card the percentage of students, by student subgroup, that have taken the ACT, SAT, or other assessment of college readiness?

Proposed indicators (c)(11) and (c)(12) will provide important information about the pipeline to post-secondary, information that will be critical to meeting the President’s goal of regaining international dominance in postsecondary attainment. And while we support the intent of proposed indicator (c)(13), we do not believe it sets a high-enough standard. New research highlights the importance of early credit accumulation in providing momentum toward students

earning a degree: The more credits students earn in their first year, the higher their chance of completing. One study shows that over 75 percent of students who completed at least 24 credits in the first year earned a bachelor's as compared to a 38 percent graduation rate for students who completed less than that.¹

Accordingly, we propose that indicator (c)(13) be altered to read as follows:

Indicator (c)(13). Provide, for the State, for each LEA in the State, for each high school in the State and, at each of these levels, by student subgroup, of the students who graduate from high school who enroll in public IHE, the number and percentage who earn at least 24 credits in the first year.

Supporting Struggling Schools (Section (I)(d))

We applaud the Administration's focus on ensuring that struggling schools get timely and effective help. And we support taking bold action in those schools that can't or won't improve. The proposed indicators would shed light on important questions about patterns of achievement and actions taken in struggling schools but, without revision, will provide an incomplete and misleading picture.

Definition and Reporting of Schools Making Progress

Proposed indicators (d)(1) and (d)(2) ask for the number and percentage of schools that are in need of improvement, corrective action, or restructuring that are making progress. It is critical that we know whether those schools consistently falling below State goals, overall or for student groups, are increasing achievement for those students. However, the proposed definition of progress, "gains on student assessment, in the 'all students' category, [that are] are equal to or greater than the average gains of schools in the State on that assessment," will not necessarily yield this information for two reasons. First, the definition assumes that, on average, proficiency rates in reading and math are improving from year to year. While this is true in many States, in some, proficiency rates have been nearly flat, and in others they have declined. Second, the definition does not take into account the fact that some schools are identified as In Need of Improvement for the performance of a specific subgroup.

We propose that the definition of progress be modified as follows:

¹ National Association of System Heads and Institute for Higher Education Leadership and Policy, "Advancing by Degrees: A Framework for Increasing College Completion," (report currently in press).

A school that has made progress means a school--

- whose gains on the assessment in the “all students” category are greater than zero and
- ***for schools identified as In Need of Improvement in the “all students” category***, whose gains in the “all students” category are equal to or greater than the average gains of schools in the State on that assessment in this category; OR
- ***for schools identified as In Need of Improvement for a subgroup or subgroups, but not in the “all students” category***, whose gains for each of these subgroups are equal to or greater than the average gains of schools in the State on that assessment in the “all students” category, and are greater than zero.

We also propose two additional indicators about school progress to encourage transparency and learning from those schools that are making progress.

Add new indicators numbered “Indicator (d)(3)” and “Indicator (d)(4),” and renumber the other indicators accordingly:

Indicator (d)(3). Report the average Statewide gains used to determine whether schools meet the definition of making progress in a) reading and b) mathematics, respectively

Indicator (d)(4). Identify, by name, those schools in improvement, corrective action, or restructuring determined to be making progress in a) reading and in b) mathematics, respectively.

Reporting of Schools that Have Been Turned Around, Consolidated, or Closed

The existing proposed indicators (d)(3), (d)(4), and (d)(5) would elicit information about the number and percentage of schools in need of improvement, corrective action, and restructuring—and the lowest-performing among them—in which dramatic action has taken place. We strongly support the Administration’s focus on the lowest-performing schools, and appreciate the proposed consideration of both absolute performance and progress when assigning this designation.

However, we believe that States are unlikely to have used this framework in the past when deciding which schools they should turn around or close. They are much more likely to have looked at the “Restructuring” designation. Moreover, the proposed indicators would only require States to provide information on where turnaround efforts have happened, not the *success* of those efforts.

We propose revisions to existing indicators (d)(3) through (d)(5) that would focus on the schools that States are currently obligated to take drastic action in under ESEA, require evidence of the

results of those actions, and reduce the reporting burden on States by maximizing the overlap between these indicators and the evidence of Reform Conditions for the Race to the Top Fund.

We recommend that existing indicators (d)(3), (d)(4), and (d)(5) be replaced with two new indicators numbered “Indicator (d)(5)” and “Indicator (d)(6).” These new indicators represent a modified version of the “minimum proposed evidence” (D)(3) under Race to the Top. They have been re-numbered according to the proposed addition of new Indicators (d)(3) and (d)(4) above. Indicators (d)(5) and (d)(6) should read:

Indicator (d)(5). For each LEA in the State, report the number of Title I schools in restructuring in each of the last 5 years, and of this total number of schools,

- a) The number each year that have been turned around with new leadership and a majority of new staff;
- b) The number each year that have been turned around through conversion to charter schools, CMO-operated schools, or EMO-operated schools; and
- c) The number each year that have been closed and the students placed in high-performing schools.

Indicator (d)(6). For each school that has been turned around or converted to charter (schools in (a) and (b) above) report as many years of math and ELA test results (and graduation rates for high schools) as are available. For example, for a school that was turned around in SY 2006, report these data for SY 2006, SY2007, SY2008 and SY2009. For a school that was turned around in SY 2008, report data for SY2008 and SY2009.

A proposed reporting form for proposed indicators (d)(3) – (d)(6) is in **Appendix B** of this commenting document.

APPENDIX A

Recommended Reporting Form for Indicator (b)(1):

Indicator (b)(1).

To reduce the reporting burden, the table below contains State answers to questions from the Data Quality Campaign’s 2008 survey on data system elements aligned with America COMPETES elements 1-10. If a “NO” has changed to a “YES” for any question, first circle the “X” in the NO” box and then check the “YES” box.

Additional questions have been asked to assess State status on America COMPETES elements 11 and 12.

	NO	YES
<u>ELEMENT 1: A unique statewide student identifier that connects student data across key databases across years</u>		
1) The state uses a unique statewide student identifier that connects student data across key databases across years.		
<u>ELEMENT 2: Student-level enrollment, demographic, and program participation information</u>		
2) The state collects student-level enrollment data in the fall.		
3) The enrollment data is stored permanently by the state so that it can be used in subsequent years to determine continuous enrollment.		
<u>ELEMENT 3: Student-level data about the points at which students exit, transfer in, transfer out, drop out, or complete P-16 education programs.</u>		
4) The state collects student-level graduation data.		
5) The state collects student-level dropout data.		
6) The state collects student-level transfer data.		
<u>ELEMENT 4: The capacity to communicate with higher education data systems</u>		
7) Student-level K-12 records can be matched with the records of the same students in all of the state's public colleges and universities.		
<u>ELEMENT 5: An audit system assessing data quality, validity, and reliability</u>		
8) A state data audit system exists to review the accuracy of data submitted.		
9) Statistical checks are performed on data submitted by school		

districts.		
<u>ELEMENT 6: Yearly State assessment records of individual students</u>		
10) The state collects and maintains student-level test data.		
11) The test data is stored permanently by the state so that it can be used in subsequent years to determine students' prior achievement and academic progress.		
<u>ELEMENT 7: Information on students not tested by grade and subject</u>		
12) The state collects and maintains individual records on each untested student in a tested grade.		
13) There are specific explanations why each untested student was not tested.		
<u>ELEMENT 8: A teacher identifier system with the ability to match teachers to students</u>		
14) Each teacher has a unique identifier.		
15) The state can match records across teachers and students by course and/or subject in <i>elementary</i> school.		
16) The state can match records across teachers and students by course and/or subject in <i>middle</i> school.		
17) The state can match records across teachers and students by course and/or subject in <i>high</i> school.		
<u>ELEMENT 9: Student-level transcript information, including information on courses completed and grades earned</u>		
18) The state collects and maintains student-level course completion data.		
<u>ELEMENT 10: Student-level college readiness test scores</u>		
19) The state collects and permanently stores student-level AP exam results.		
20) The state collects and permanently stores student-level SAT exam results.		
21) The state collects and permanently stores student-level ACT exam results.		
<u>ELEMENT 11: Information regarding the extent to which students transition</u>		

successfully from secondary school to postsecondary education, including whether students enroll in remedial coursework		
22) The state colleges and universities collect student-level post-secondary enrollment data that can be matched with the records of the same students in K-12.		
23) The state colleges and universities collect student-level post-secondary data on remediation enrollment and completion that can be matched with the records of the same students in K-12.		
<u>ELEMENT 12</u>: Other information determined necessary to address alignment and adequate preparation for success in post-secondary education.		
24) The state colleges and universities collect student-level post-secondary data on credit accumulation that can be matched with the records of the same students in K-12.		
25) The state colleges and universities collect student-level post-secondary data on degree attainment by type that can be matched with the records of the same students in K-12.		

APPENDIX B

Recommended Reporting Form for New Indicators (d)(3), (d)(4), (d)(5), and (d)(6):

Indicator (d)(3).

Report the average Statewide gains in the “overall students” category used to determine whether schools meet the definition of making progress in a) reading and b) mathematics, respectively.

	Reading/language arts		Mathematics	
	Average gains on state assessment between SY 2008 and SY 2009	Units (% proficient, scale score, state index*)	Average gains on state assessment between SY 2008 and SY 2009	Units (% proficient, scale score, state index*)
Elementary/middle				
High school				

*If using an index, provide detailed explanation of formula used to derive the index.

Indicator (d)(4).

Identify each school in School Improvement, Corrective Action, or Restructuring that has made progress (as defined in this notice) on the State reading/language arts and/or mathematics assessment.

School ID	School Name	This school made progress in (Check all that apply)	
		Reading/ Language Arts	Mathematics

Indicator (d)(5).

For each LEA in the State, report the number of Title I schools in restructuring in each of the last 5 years, and of this total number of schools,

- a) The number each year that have been turned around with new leadership and a majority of new staff.
- b) The number that have been turned around through conversion to charter schools, CMO-operated schools, or EMO-operated schools; and
- c) The number that have been closed at and the students placed in high-performing schools.

LEA ID	LEA Name	School Year	Number of schools in Restructuring	Of the schools in restructuring in each school year		
				Number turned around (A)	Number closed and re-opened as charters (B)	Number that were closed (C)

Indicator (d)(6).

For each school that has been turned around or converted to charter (schools in (A) and (B) above) report as many years of math and reading/language arts test results (and graduation rates for high schools) as are available. For example, for a school that was turned around in SY 2006, report these data for SY 2006, SY2007, SY2008 and SY2009. For a school that was turned around in SY 2008, report data for SY2008 and SY2009.

				Year schools was turned around/closed and re-opened	Percent of students proficient in Math					Percent of students proficient in Reading/ Language Arts					Graduation Rate (High schools only)				
Old LEA ID	Old School ID	New LEA ID	New School ID		SY 2005	SY 2006	SY 2007	SY 2008	SY 2009	SY 2005	SY 2006	SY 2007	SY 2008	SY 2009	SY 2005	SY 2006	SY 2007	SY 2008	SY 2009