

**NCDPI EXCERPTS REGARDING 6 INTERVENTION MODELS FROM:**

**GUIDANCE  
ON  
SCHOOL IMPROVEMENT GRANTS  
UNDER SECTION 1003(g) OF THE ELEMENTARY AND SECONDARY EDUCATION ACT OF 1965**



U.S. Department of Education  
Office of Elementary and Secondary Education

March 2015

**LEA / Charter Applicants - PLEASE NOTE**

The NCDPI SIG Coordinator is providing excerpts from this USED document to help LEAs / Charters fully understand the **6 Interventions Models** of which to choose from for the 2016 SIG Competition – Cohort IV.

NOTE: It should be understood that it is the LEA's /Charter's responsibility to become familiar with both the "Guidance on School Improvement Grants" (from which these excerpts are drawn from) dated March 2015 and the document located in the Federal Register "Final Requirements – School Improvement Grants" dated February 9, 2015.

Both documents can be found at The US Department of Education's SIG website:

<http://www2.ed.gov/programs/sif/index.html>

and on the NCStar Weebly website:

<http://ncstar.weebly.com/sig-iv.html>

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**The 6 Models from which NC LEAs / Charters may choose from for the 2016 SIG Competition – Cohort IV are:**

- 1.) Turnaround
- 2.) Restart
- 3.) Closure
- 4.) Transformation
- 5.) Whole-School Reform
- 6.) Early Childhood

**When selecting a Model – EACH\* component of the model must be met within the LEA / Charter SIG Application AND demonstrated throughout the implementation years of the Grant.**

\*See rural flexibility exception at the close of this document

**1.) TURNAROUND Model:**

**B-1. What are the required elements of a turnaround model?**

A turnaround model is one in which an LEA must do the following:

- (1) Replace the principal and grant the principal sufficient operational flexibility (including in staffing, calendars/time, and budgeting) to implement fully a comprehensive approach in order to substantially improve student achievement outcomes and increase high school graduation rates;
- (2) Using locally adopted competencies to measure the effectiveness of staff who can work within the turnaround environment to meet the needs of students,
  - (A) Screen all existing staff and rehire no more than 50 percent; and
  - (B) Select new staff;
- (3) Implement such strategies as financial incentives, increased opportunities for promotion and career growth, and more flexible work conditions that are designed to recruit, place, and retain staff with the skills necessary to meet the needs of the students in the turnaround school;
- (4) Provide staff ongoing, high-quality job-embedded professional development that is aligned with the school's comprehensive instructional program and designed with school staff to ensure that they are equipped to facilitate effective teaching and learning and have the capacity to successfully implement school reform strategies;
- (5) Adopt a new governance structure, which may include, but is not limited to, requiring the school to report to a new "turnaround office" in the LEA or SEA, hire a "turnaround leader" who reports directly to the Superintendent or Chief Academic Officer, or enter into a multi-year contract with the LEA or SEA to obtain added flexibility in exchange for greater accountability;
- (6) Use data to identify and implement an instructional program that is research-based and vertically aligned from one grade to the next as well as aligned with State academic standards;
- (7) Promote the continuous use of student data (such as from formative, interim, and summative assessments) to inform and differentiate instruction in order to meet the academic needs of individual students;
- (8) Establish schedules and implement strategies that provide increased learning time; and
- (9) Provide appropriate social-emotional and community-oriented services and supports for students.

**B-2. In addition to the required elements, what optional elements may also be a part of a turnaround model?**

In addition to the required elements, an LEA implementing a turnaround model may also implement other strategies, such as a new school model or any of the required and permissible activities under the transformation intervention model described in the final requirements. It could also, for example, implement a high-quality preschool program that is designed to improve the health, social-emotional outcomes, and school readiness for high-need young children or replace a comprehensive high school with one that focuses on science, technology, engineering, and mathematics (STEM). The key is that these actions would be taken within the framework of the turnaround model and would be in addition to, not instead of, the actions that are required as part of a turnaround model.

**B-3. What is the definition of “staff” as that term is used in the discussion of a turnaround model?**

As used in the discussion of a turnaround model, “staff” includes all instructional staff, but an LEA has discretion to determine whether or not “staff” also includes non-instructional staff. An LEA may decide that it is appropriate to include non-instructional staff in the definition of “staff,” as all members of a school’s staff contribute to the school environment and are important to the success of a turnaround model.

In determining the number of staff members that may be rehired, an LEA should count the total number of staff positions (however staff is defined) within the school in which the model is being implemented, including any positions that may be vacant at the time of the implementation. For example, if a school has a total of 100 staff positions, only 90 of which are filled at the time the model is implemented, the LEA may rehire 50 staff members; the LEA is not limited to rehiring only 45 individuals (50 percent of the filled staff positions). (See G-1c for additional information on how an LEA should determine the number of staff members that must be replaced when taking advantage of the flexibility to continue or complete interventions that have been implemented within the last two years.)

**B-3a. The response to B-3 states that “staff” includes “all instructional staff.” Does “all instructional staff” mean only teachers of core academic subjects or does it also include physical education teachers and teachers of other non-core academic subjects?**

“All instructional staff” includes teachers of core academic subjects as well as teachers of non-core academic subjects. Section I.A.2(a)(1)(B) of the final requirements requires an LEA to measure the effectiveness of “staff” who work within the turnaround environment. As is stated in B-3, an LEA has discretion to determine whether or not to include non-instructional staff, in addition to instructional staff, in meeting this requirement. An LEA may decide it is appropriate to include non-instructional staff in the definition of “staff” as all members of a school’s staff contribute to the school environment and are important to the success of a turnaround model.

**B-4. What are “locally adopted competencies”?**

A “competency,” which is a skill or consistent pattern of thinking, feeling, acting, or speaking that causes a person to be effective in a particular job or role, is a key predictor of how someone will perform at work. Given that every teacher brings a unique skill set to the classroom, thoughtfully developed assessments of such competencies can be used as part of a rigorous recruitment, screening, and selection process to identify educators with the unique qualities that equip them to succeed in the turnaround environment and can help ensure a strong match between teachers and particular turnaround schools. As part of a rigorous recruitment, screening and selection process, assessments of turnaround teachers’ competencies can be used by the principal or district leader to distinguish between very high performers and more typical or lower-performing teachers in a turnaround setting. Although an LEA may already have and use a set of tools to screen for appropriate competencies as part of its normal hiring practices, it is important to develop a set of competencies specifically designed to identify staff that can be effective in a turnaround situation because, in a turnaround school, failure has become an entrenched way of life for students and staff, and staff members need stronger and more consistent habits in critical areas to transform the school’s wide-scale failure into learning success.

While each LEA should identify the skills and expertise needed for its local context, in addition to reviewing evidence of effectiveness in previous teaching positions (or other pre-service experience) in the form of recommendations, portfolios, or student outcomes, examples of locally adopted competencies might include acting with initiative and persistence, planning ahead, flexibility, respect for and sensitivity to norms of interaction in

different situations, self-confidence, team leadership, developing others, analytical thinking, and conceptual thinking.

The value and utility of turnaround competencies for selection are dependent on the process by which an LEA or school leader or team uses them. In addition to assessing a candidate's subject knowledge and mastery of specific instructional practices that the turnaround school uses, using a robust and multi-tiered selection process that includes interviews that ask about past practice in the classroom or situational scenarios, reviewing writing samples, observing teachers in their classrooms, and asking teachers to perform job-related tasks such as presenting information to a group of parents, are all common techniques used to screen candidates against turnaround competencies.

Note that these are merely examples of a process and set of competencies an LEA might measure and use in screening and selecting staff to meet the unique needs of the schools in which it will implement a turnaround model.

**B-5. Is an LEA implementing the turnaround model required to use financial incentives, increased opportunities for promotion and career growth, and more flexible conditions as strategies to recruit, place, and retain staff with the skills necessary to meet the needs of the students in a turnaround model?**

No. The specific strategies mentioned in this requirement (see B-1(3)) are merely examples of the types of strategies an LEA might use to recruit, place, and retain staff with the skills necessary to meet the needs of the students in a school implementing the turnaround model. An LEA is not obligated to use these particular strategies, so long as it implements some strategies that are designed to recruit, place, and retain the appropriate staff.

**B-6. What is job-embedded professional development?**

Job-embedded professional development is professional learning that occurs at a school as educators engage in their daily work activities. It is closely connected to what teachers are asked to do in the classroom so that the skills and knowledge gained from such learning can be immediately transferred to classroom instructional practices. Job-embedded professional development is usually characterized by the following:

- It occurs on a regular basis (*e.g.*, daily or weekly);
- It is aligned with academic standards, school curricula, and school improvement goals;
- It involves educators working together collaboratively and is often facilitated by school instructional leaders or school-based professional development coaches or mentors;
- It requires active engagement rather than passive learning by participants; and
- It focuses on understanding what and how students are learning and on how to address students' learning needs, including reviewing student work and achievement data and collaboratively planning, testing, and adjusting instructional strategies, formative assessments, and materials based on such data.

Job-embedded professional development can take many forms, including, but not limited to, classroom coaching, structured common planning time, meetings with mentors, consultation with outside experts, and observations of classroom practice.

When implemented as part of a turnaround model, job-embedded professional development must be designed with school staff.

**B-7. Does the requirement to implement an instructional program that is research-based and aligned (vertically and with State standards) require adoption of a new or revised instructional program?**

Not necessarily. In implementing a turnaround model, an LEA must use data to identify an instructional program that is research-based and vertically aligned as well as aligned with State academic standards. If an LEA determines, based on a careful review of appropriate data, that the instructional program currently being implemented in a particular school is research-based and properly aligned, it may continue to implement that instructional program. However, the Department expects that most LEAs with Tier I, Tier II, priority, or focus schools will need to make at least minor adjustments to the instructional programs in those schools to ensure that

those programs are, in fact, research-based and properly aligned.

**B-8. What are examples of social-emotional and community-oriented services that may be supported with SIG funds in a school implementing a turnaround model?**

Social-emotional and community-oriented services that may be offered to students in a school implementing a turnaround model may include, but are not limited to: (a) safety programs; (b) community stability programs that reduce the mobility rate of students in the school; or (c) family and community engagement programs that support a range of activities designed to build the capacity of parents and school staff to work together to improve student academic achievement, such as a family literacy program for parents who need to improve their literacy skills in order to support their children’s learning.

If funds are not reasonably available from other public or private sources to support the planning and implementation of the services and the LEA has engaged in a comprehensive needs assessment, SIG funds might be used to hire a coordinator or to contract with an organization to facilitate the delivery of health, nutrition, and social services to the school’s students in partnership with local service providers. SIG funds also might be used for (1) professional development necessary to assist teachers, pupil services personnel, other staff, and parents in identifying and meeting the comprehensive needs of students, and (2) as a last resort when funds are not reasonably available from other public or private sources, the provision of basic medical equipment, such as eyeglasses and hearing aids.

An LEA should examine the needs of students in the turnaround school to determine which social-emotional and community-oriented services will be appropriate and useful under the circumstances. Further, like all other activities supported with SIG funds, any services provided must address the needs identified by the needs assessment the LEA conducted prior to selecting the turnaround model for the school and must be reasonable and necessary. (See I-30.)

**B-9. May an LEA omit any of the actions outlined in the final requirements and implement its own version of a turnaround model?**

No. An LEA implementing a turnaround model in one or more of its schools must take all of the actions required by the final requirements. As discussed in B-2, an LEA may take additional actions to supplement those that are required as part of a turnaround model, but it may not implement its own version of a turnaround model that does not include all of the elements required by the final requirements. Thus, an LEA could not, for example, convert a turnaround school to a magnet school without also taking the other actions specifically required as part of a turnaround model.

**2.) RESTART Model:**

**C-1. What is the definition of a restart model?**

A restart model is one in which an LEA converts a school or closes and reopens a school under a charter school operator, a charter management organization (CMO), or an education management organization (EMO) that has been selected through a rigorous review process (see C-5). A restart model must enroll, within the grades it serves, any former student who wishes to attend the school (see C-6).

**C-2. What is a CMO?**

A CMO is a non-profit organization that operates or manages charter schools by centralizing or sharing certain functions and resources among schools.

**C-3. What is an EMO?**

An EMO is a for-profit or non-profit organization that provides “whole-school operation” services to an LEA.

**C-4. Prior to submitting its application for SIG funds, must an LEA know the particular EMO or CMO with which it would contract to restart a school?**

No. Prior to submitting its application, an LEA need not know the particular EMO or CMO with which it would contract to restart a school, but it should at least have a pool of potential partners that have expressed an interest in and have exhibited an ability to restart the school in which the LEA proposes to implement the restart model. An LEA does not need to enter into a contract prior to receiving its SIG funds, but it must be able to provide enough information in its application for the SEA to be confident that, if awarded SIG funds, the LEA would in fact enter into a contract with a CMO or EMO to implement the restart model.

**C-5. What must the “rigorous review process” used for selecting a charter school operator, a CMO, or an EMO include?**

The rigorous review process must include a determination by the LEA that the selected charter school operator, CMO, or EMO is likely to produce strong results for the school. In making this determination, the LEA must consider the extent to which the schools currently operated or managed by the selected charter school operator, CMO, or EMO, if any, have produced strong results over the past three years (or over the life of the school, if the school has been open for fewer than three years), including:

- (1) Significant improvement in academic achievement for all of the groups of students described in section 1111(b)(2)(C)(v) of the ESEA;
- (2) Success in closing achievement gaps, either within schools or relative to all public elementary school and secondary school students statewide, for all of the groups of students described in section 1111(b)(2)(C)(v)(II) of the ESEA;
- (3) High school graduation rates, where applicable, that are above the average rates in the State for the groups of students described in section 1111(b)(2)(C)(v) of the ESEA; and
- (4) No significant compliance issues, including in the areas of civil rights, financial management, and student safety.

The purpose of the rigorous review process is to provide an LEA with an opportunity to ensure that the operator will use this model to make meaningful changes in a school. Through the rigorous review process, an LEA might also, for example, require a prospective operator to demonstrate that its strategies are evidence-based and that it has the capacity to implement the strategies it is proposing. In determining whether a charter school or CMO has significant compliance issues, through the rigorous review process, an LEA should ensure that the charter school or CMO has sufficient internal controls and oversight to properly administer Federal education funds.

**C-6. Which students must be permitted to enroll in a school implementing a restart model?**

A restart school must enroll, within the grades it serves, all former students who wish to attend the school. The purpose of this requirement is to ensure that restarting the school benefits the population of students who would be served by the school in the absence of “restarting” the school. Accordingly, the obligation to enroll any former student who wishes to attend the school includes the obligation to enroll a student who did not actually previously attend the school — for example, because the student was previously enrolled in grade 3 but the school serves only grades 4 through 6 — but who would now be able to enroll in the school were it not implementing the restart model. If the restart school no longer serves a particular grade or grades that previously had been served by the school, the restart school is not obligated to enroll a student in the grade or grades that are no longer served.

**C-6a. May an EMO or CMO with which an LEA contracts to implement a restart model require students or parents to agree to certain conditions in order to attend the school?**

Yes, under the restart model, a provider may require all former students who wish to attend the restart school to sign student or parent/student agreements covering student behavior, attendance, or other commitments related to academic performance. In other words, a decision by a student or parent not to sign such an agreement amounts to an indication that the student does not wish to attend the school implementing the restart model. A provider may not, however, require students to meet, for example, certain academic standards prior to enrolling in the school.

**C-7. May a restart school serve fewer grades than were previously served by the school in which the model is being implemented?**

Yes. An LEA has flexibility to work with providers to develop the appropriate sequence and timetable for a restart partnership. Thus, for example, an LEA could allow a restart operator to take over one grade in the school at a time.

If an LEA allows a restart operator to serve only some of the grades that were previously served by the school in which the model is being implemented, the LEA must ensure that the SIG funds it receives for the school are used only for the grades being served by the restart operator, unless the LEA is implementing one of the other SIG models with respect to the other grades served by the school. For example, if the school in question previously served grades K-6 and the LEA allows a restart operator to take over the school only with respect to grades K-3, the LEA could use SIG funds to serve the students in grades 4-6 if it implements a turnaround model or school closure, consistent with the final requirements, with respect to those grades.

Note that, similarly, an LEA has the flexibility to develop the appropriate sequence and timetable for implementing a turnaround, transformation, or closure, such that, for example, an LEA may implement any of those models in one grade in a school at a time. Just as with the restart model, if an LEA implements a turnaround, transformation, or closure for only some of the grades that were previously served by the school in which the model is being implemented, the LEA must ensure that the SIG funds it receives for the school are used only for the grades in which the model is being implemented, unless the LEA is implementing one of the other SIG models with respect to the other grades served by the school. The Department strongly encourages LEAs to provide those students in grades not implementing a SIG model the opportunity to transfer to a higher-performing school.

**C-8. May a school implementing a restart model implement any of the required or permissible activities of one of the other SIG models?**

Yes. A school implementing a restart model may implement activities described in the final requirements with respect to other models. Indeed, a restart operator has considerable flexibility not only with respect to the school improvement activities it will undertake, but also with respect to the type of school program it will offer. The restart model is specifically intended to give operators flexibility and freedom to implement their own reform plans and strategies.

**C-9. If an LEA implements a restart model, must its contract with the charter school operator, CMO, or EMO hold the charter school operator, CMO, or EMO accountable for meeting the final requirements?**

Yes. If an LEA implements a restart model in a Tier I, Tier II, priority, or focus school, the LEA must include in its contract or agreement terms and provisions to hold the charter school operator, CMO, or EMO accountable for complying with the final requirements. An LEA should bear this accountability requirement in mind at the time of contracting with the charter school operator, CMO, or EMO, and should consider how best to reflect it in the contract or agreement.

**C-10. May an LEA use SIG funds to pay a fee to a CMO or EMO to operate a restart model?**

Yes, but only to the extent the fee is reasonable and necessary to implement the restart model and to the extent it provides a benefit to improve the academic achievement of students. An LEA, thus, has the responsibility, in entering into a contract with a CMO or EMO, to ensure that any fee that is part of the contract is reasonable and necessary. *See* 2 C.F.R. § 200.403 (to be allowable under a Federal grant, costs must be “necessary and reasonable for the performance of the Federal award”). *See also* 2 C.F.R. § 200.405 (“a cost [may only be charged to a Federal program] in accordance with relative benefits received”). In making this determination, the LEA must ensure that there is a direct relationship between the fee and the services that the CMO or EMO will provide using SIG funds and that those services are necessary to implement the SIG model in the school being restarted. It may not be reasonable, for example, for a CMO or EMO to charge a flat percentage of the SIG funds available, irrespective of the services to be provided, particularly in light of the significant amount of SIG funds that would be available to a school for five years. For example, if a CMO or EMO normally charges a fee of five percent of gross receipts to operate a school, it may not be reasonable to calculate that percentage on the additional \$10 million in SIG funds

that could be available, absent a very strong demonstration that its costs for providing services increase commensurately with the amount of SIG funds available. Moreover, the LEA must be able to demonstrate, as part of its commitment to obtain SIG funds, that it can sustain the services of the CMO or EMO and any attendant fee after the SIG funds are no longer available (Sections I.A.4(a)(12) and II.A.2(c)) and include a budget for each school it intends to serve that identifies any fee (Section II.A.2(e)).

In addition, an SEA has the responsibility, in reviewing and approving an LEA's application to implement the restart model in one or more of its Tier I, Tier II, priority, or focus schools, to consider the LEA's capacity to implement the model, including the reasonableness of its SIG budget and its ability to sustain the model after SIG funds are no longer available, and may approve the LEA's application only if the SEA determines that the LEA can implement fully and effectively the model. See Sections I.A.4(b) and II.B.2(b).

### **3.) SCHOOL CLOSURE Model:**

#### **D-1. What is the definition of "school closure"?**

School closure occurs when an LEA closes a school and enrolls the students who attended that school in other schools in the LEA that are higher achieving. These other schools should be within reasonable proximity to the closed school and may include, but are not limited to, charter schools or new schools for which achievement data are not yet available.

#### **D-1a. How important is it for an LEA to engage families and the community in the LEA's decision to close a school under the school closure intervention model?**

It is extremely important to engage families and the school community early in the process of selecting the appropriate school improvement model to implement in a school (see H-4a), but doing so is particularly important when considering school closure.

It is critical that LEA officials engage in an open dialogue with families and the school community early in the closure process to ensure that they understand the data and reasons supporting the decision to close, have a voice in exploring quality options, and help plan a smooth transition for students and their families at the receiving schools.

#### **D-2. What costs associated with closing a school can be paid for with SIG funds?**

An LEA may use SIG funds to pay certain reasonable and necessary costs associated with closing a Tier I, Tier II, priority, or focus school, such as costs related to parent and community outreach, including, but not limited to, press releases, newsletters, newspaper announcements, hotlines, direct mail notices, or meetings regarding the school closure; services to help parents and students transition to a new school; or orientation activities, including open houses, that are specifically designed for students attending a new school after their prior school closes. Other costs, such as revising transportation routes, transporting students to their new school, or making class assignments in a new school, are regular responsibilities an LEA carries out for all students and generally may not be paid for with SIG funds. However, an LEA may use SIG funds to cover these types of costs associated with its general responsibilities if the costs are directly attributable to the school closure and exceed the costs the LEA would have incurred in the absence of the closure.

#### **D-3. May SIG funds be used in the school that is receiving students who previously attended a school that is subject to closure in order to cover the costs associated with accommodating those students?**

No. In general, the costs a receiving school will incur to accommodate students who are moved from a closed school are costs that an LEA is expected to cover, and may not be paid for with SIG funds. However, to the extent a receiving school is a Title I school that increases its population of children from low-income families, the school should receive additional Title I, Part A funds through the Title I, Part A funding formula, and those Title I, Part A funds could be used to cover the educational costs for these new students. If the school is not currently a Title I school, the addition of children from low-income families from a closed school might make it an eligible school.

#### **D-4. Is the portion of an LEA's SIG subgrant that is to be used to implement a school closure renewable?**



Generally, no. The portion of an LEA’s SIG subgrant for a school that is subject to closure is limited to the time necessary to close the school — usually one year or less. As such, the funds allocated for a school closure would not be subject to renewal.

**D-5. How can an LEA determine whether a higher-achieving school is within reasonable proximity to a closed school?**

The school to which students who previously attended a closed school are sent should be located “within reasonable proximity” to the closed school. An LEA has discretion to determine which schools are located within a reasonable proximity to a closed school. A distance that is considered to be within a “reasonable proximity” in one LEA may not be within a “reasonable proximity” in another LEA, depending on the nature of the community. In making this determination, an LEA should consider whether students who would be required to attend a new school because of a closure would be unduly inconvenienced by having to travel to the new location. An LEA should also consider whether the burden on students could be eased by designating multiple schools as receiving schools.

An LEA should not eliminate school closure as an option simply because the higher-achieving schools that could be receiving schools are located at some distance from the closed school, so long as the distance is not unreasonable. Indeed, it is preferable for an LEA to send students who previously attended a closed school to a higher-achieving school that is located at some distance from, but still within reasonable proximity to, the closed school than to send those students to a lower-performing school that is geographically closer to the closed school. Moreover, an LEA should consider allowing parents to choose from among multiple higher-achieving schools, at least one of which is located within reasonable proximity to the closed school. By providing multiple school options, a parent could decide, for example, that it is worth having his or her child travel a longer distance in order to attend a higher-achieving school. Ultimately, the LEA’s goal should be to ensure that students who previously attended a closed school are able to enroll in the highest-performing school that can reasonably be offered as an alternative to the closed school.

**D-6. In what kinds of schools may students who previously attended a closed school enroll?**

The higher-achieving schools in which students from a closed school may enroll may include any public school with the appropriate grade ranges, including public charter schools and new schools for which achievement data are not yet available. Note that a new school for which achievement data are not yet available may be a receiving school even though, as a new school, it lacks a history of being a “higher-achieving” school.

**4.) TRANSFORMATION Model:**

**E-1. With respect to elements of the transformation model that are the same as elements of the turnaround model, do the definitions and other guidance that apply to those elements as they relate to the turnaround model also apply to those elements as they relate to the transformation model?**

Yes. Thus, for example, the strategies that are used to recruit, place, and retain staff with the skills necessary to meet the needs of students in a turnaround model may be the same strategies that are used to recruit, place, and retain staff with the skills necessary to meet the needs of students in a transformation model. For questions about any terms or strategies that appear in both the transformation model and the turnaround model, refer to the turnaround model section of this guidance.

**E-2. Which activities related to developing and increasing teacher and school leader effectiveness are required for an LEA implementing a transformation model?**

An LEA implementing a transformation model must:

- (1) Replace the principal who led the school prior to commencement of the transformation model;
- (2) Implement rigorous, transparent, and equitable evaluation and support systems for teachers and principals, designed and developed with teacher and principal involvement, that —
  - (a) Will be used for continual improvement of instruction;

- (b) Meaningfully differentiate performance using at least three performance levels;
- (c) Use multiple valid measures in determining performance levels, including as a significant factor data on student growth (see A-33) for all students (including ELs and students with disabilities), and other measures of professional practice (which may be gathered through multiple formats and sources), such as observations based on rigorous teacher performance standards, teacher portfolios, and student and parent surveys;
- (d) Evaluate teachers and principals on a regular basis;
- (e) Provide clear, timely, and useful feedback, including feedback that identifies needs and guides professional development; and
- (f) Will be used to inform personnel decisions.

(3) Use the teacher and principal evaluation and support system described above to identify and reward school leaders, teachers, and other staff who, in implementing the transformation model, have increased student achievement and high school graduation rates and identify and remove those who, after ample opportunities have been provided for them to improve their professional practice, have not done so; and

(4) Implement such strategies as financial incentives, increased opportunities for promotion and career growth, and more flexible work conditions that are designed to recruit, place, and retain staff with the skills necessary to meet the needs of the students in the school, taking into consideration the results from the teacher and principal evaluation and support system, if applicable.

**E-3. Must the principal and teachers involved in the development and design of the evaluation system be the principal and teachers in the school in which the transformation model is being implemented?**

No. The requirement for teacher and principal evaluation and support systems that “are designed and developed with teacher and principal involvement” refers more generally to involvement by teachers and principals within the LEA using such systems, and may or may not include teachers and principals in a school implementing the transformation model.

**E-4. Under the final requirements, an LEA implementing the transformation model must remove staff “who, after ample opportunities have been provided for them to improve their professional practice, have not done so.” Does an LEA have discretion to determine the appropriate number of such opportunities that must be provided and what are some examples of such “opportunities” to improve?**

In general, LEAs have flexibility to determine both the type and number of opportunities for staff to improve their professional practice before they are removed from a school implementing the transformation model. Examples of such opportunities include professional development in such areas as differentiated instruction and using data to improve instruction, mentoring or partnering with a master teacher, or increased time for collaboration designed to improve instruction.

**E-5. In addition to the required activities, what other activities related to developing and increasing teacher and school leader effectiveness may an LEA undertake as part of its implementation of a transformation model?**

In addition to the required activities for a transformation model, an LEA may also implement other strategies to develop teachers’ and school leaders’ effectiveness, such as:

- (1) Providing additional compensation to attract and retain staff with the skills necessary to meet the needs of students in a transformation school;
- (2) Instituting a system for measuring changes in instructional practices resulting from professional development; or
- (3) Ensuring that the school is not required to accept a teacher without the mutual consent of the teacher and principal, regardless of the teacher’s seniority.

LEAs also have flexibility to develop and implement their own strategies, as part of their efforts to successfully implement the transformation model, to increase the effectiveness of teachers and school leaders. Any such strategies must be in addition to those that are required as part of this model.

**E-6. How does the optional activity of “providing additional compensation to attract and retain” certain staff differ from the requirement to implement strategies designed to recruit, place, and retain certain staff?**

There are a wide range of compensation-based incentives that an LEA might use as part of a transformation model. Such incentives are just one example of strategies that might be adopted to recruit, place, and retain staff with the skills needed to implement the transformation model. The more specific emphasis on additional compensation in the permissible strategies was intended to encourage LEAs to think more broadly about how additional compensation can contribute to teacher effectiveness.

**E-7. Which activities related to comprehensive instructional reform strategies are required as part of the implementation of a transformation model?**

An LEA implementing a transformation model must:

- (1) Use data to identify and implement an instructional program that is research-based and vertically aligned from one grade to the next as well as aligned with State academic standards;
- (2) Promote the continuous use of student data (such as from formative, interim, and summative assessments) in order to inform and differentiate instruction to meet the academic needs of individual students; and
- (3) Provide staff ongoing, high-quality, job-embedded professional development (for example, regarding subject-specific pedagogy, instruction that reflects a deeper understanding of the community served by the school, or differentiated instruction) that is aligned with the school’s comprehensive instructional program and designed with school staff to ensure they are equipped to facilitate effective teaching and learning and have the capacity to implement successfully school reform strategies.

**E-8. In addition to the required activities, what other activities related to comprehensive instructional reform strategies may an LEA undertake as part of its implementation of a transformation model?**

In addition to the required activities for a transformation model, an LEA may also implement other comprehensive instructional reform strategies, such as:

- (1) Conducting periodic reviews to ensure that the curriculum is being implemented with fidelity, is having the intended impact on student achievement, and is modified if ineffective;
- (2) Implementing a schoolwide “response-to-intervention” model;
- (3) Providing additional supports and professional development to teachers and principals in order to implement effective strategies to support students with disabilities in the least restrictive environment and to ensure that limited English proficient students acquire language skills to master academic content;
- (4) Using and integrating technology-based supports and interventions as part of the instructional program; and
- (5) In secondary schools—
  - (a) Increasing rigor by offering opportunities for students to enroll in advanced coursework, early-college high schools, dual enrollment programs, or thematic learning academies that prepare students for college and careers, including by providing appropriate supports designed to ensure that low-achieving students can take advantage of these programs and coursework;
  - (b) Improving student transition from middle to high school through summer transition programs or freshman academies;
  - (c) Increasing graduation rates through, for example, credit recovery programs, re-engagement strategies, smaller learning communities, competency-based instruction and performance-based assessments, and acceleration of basic reading and mathematics skills; or
  - (d) Establishing early-warning systems to identify students who may be at risk of failing to

achieve to high standards or to graduate.

**E-9. What activities related to increasing learning time and creating community-oriented schools are required for implementation of a transformation model?**

An LEA implementing a transformation model must:

- (1) Establish schedules and strategies that provide increased learning time; and
- (2) Provide ongoing mechanisms for family and community engagement.

**E-10. What is meant by the phrase “family and community engagement” and what are some examples of ongoing mechanisms for family and community engagement?**

In general, family and community engagement means strategies to increase the involvement and contributions, in both school-based and home-based settings, of parents and community partners that are designed to support classroom instruction and increase student achievement. Examples of mechanisms that can encourage family and community engagement include the establishment of organized parent groups, holding public meetings involving parents and community members to review school performance and help develop school improvement plans, using surveys to gauge parent and community satisfaction and support for local public schools, implementing complaint procedures for families, coordinating with local social and health service providers to help meet family needs, and parent education classes (including GED, adult literacy, and ESL programs).

**E-10a. How should an LEA design mechanisms to support family and community engagement?**

To develop mechanisms to support family and community engagement, an LEA may conduct a community-wide assessment to identify the major factors that significantly affect the academic achievement of students in the school, including an inventory of the resources in the community and the school that could be aligned, integrated, and coordinated to address these challenges. An LEA should try to ensure that it aligns the family and community engagement programs it implements in the elementary and secondary schools in which it is implementing the transformation model to support common goals for students over time and for the community as a whole.

**E-11. In addition to the required activities, what other activities related to increasing learning time and creating community-oriented schools may an LEA undertake as part of its implementation of a transformation model?**

In addition to the required activities for a transformation model, an LEA may also implement other strategies to extend learning time and create community-oriented schools, such as:

- (1) Partnering with parents and parent organizations, faith- and community-based organizations, health clinics, other State or local agencies, and others to create safe school environments that meet students’ social, emotional, and health needs;
- (2) Extending or restructuring the school day so as to add time for such strategies as advisory periods that build relationships between students, faculty, and other school staff;
- (3) Implementing approaches to improve school climate and discipline, such as implementing a system of positive behavioral supports or taking steps to eliminate bullying and student harassment; or
- (4) Expanding the school program to offer full-day kindergarten or pre-kindergarten.

**E-11a. What are examples of services an LEA might provide to create safe school environments that meet students’ social, emotional, and health needs?**

Services that help provide a safe school environment that meets students’ social, emotional, and health needs may include, but are not limited to: (a) safety programs; (b) community stability programs that reduce the mobility rate of students in the school; or (c) family and community engagement programs that support a range of activities designed to build the capacity of parents and school staff to work together to improve student academic achievement, such as a family literacy program for parents who need to improve their literacy skills in order to support their children’s learning.

**E-12. How does the optional activity of extending or restructuring the school day to add time for strategies that build relationships between students, faculty, and other school staff differ from the requirement to provide increased learning time?**

Extra time or opportunities for teachers and other school staff to create and build relationships with students can provide the encouragement and incentive that many students need to work hard and stay in school. Such opportunities may be created through a wide variety of extra-curricular activities as well as structural changes, such as dividing large incoming classes into smaller theme-based teams with individual advisers. However, such activities do not directly lead to increased learning time, which is more closely focused on increasing the number of instructional minutes in the school day or days in the school year.

**E-13. What activities related to providing operational flexibility and sustained support are required for implementation of a transformation model?**

An LEA implementing a transformation model must:

- (1) Give the school sufficient operational flexibility (such as staffing, calendars/time, and budgeting) to implement fully a comprehensive approach to substantially improve student achievement outcomes and increase high school graduation rates; and
- (2) Ensure that the school receives ongoing, intensive technical assistance and related support from the LEA, the SEA, or a designated external lead partner organization (such as a school turnaround organization or an EMO).

**E-14. Must an LEA implementing the transformation model in a school give the school operational flexibility in the specific areas of staffing, calendars/time, and budgeting?**

No. The areas of operational flexibility mentioned in this requirement are merely examples of the types of operational flexibility an LEA might give to a school implementing the transformation model. An LEA is not obligated to give a school implementing the transformation model operational flexibility in these particular areas, so long as it provides the school sufficient operational flexibility to implement fully a comprehensive approach to substantially improve student achievement outcomes and increase high school graduation rates.

**E-15. In addition to the required activities, what other activities related to providing operational flexibility and sustained support may an LEA undertake as part of its implementation of a transformation model?**

In addition to the required activities for a transformation model, an LEA may also implement other strategies to provide operational flexibility and sustained support, such as:

- (1) Allowing the school to be run under a new governance arrangement, such as a turnaround division within the LEA or SEA; or
- (2) Implementing a per-pupil school-based budget formula that is weighted based on student needs.

**E-16. In implementing the transformation model in an eligible school, may an LEA gather data during the first year of SIG funding on student growth, multiple observation-based assessments of performance, and ongoing collections of professional practice reflective of student achievement, and then remove staff members who have not improved their professional practice at the end of that first year?**

Yes. Although we expect an LEA that receives SIG funds and decides to implement the transformation model in a SIG school to implement that model fully on the first day of the school year (except for an LEA that has applied for and received SIG funds for a planning year), we recognize that certain components of the model may need to be implemented later in that process. For example, because an LEA must implement rigorous, transparent, and equitable evaluation and support systems for teachers and principals, designed and developed with teacher and principal involvement, and then provide staff with ample opportunities to improve their practices, the LEA may not be able to remove staff members who have not improved their professional practices until later in the

implementation process. (See E-3, E-4, and F-2.)

**E-17. May an LEA implement the transformation model in a high school that has grades 9-12 by assigning the current principal to grades 10-12 and hiring a new principal to lead a 9th-grade academy?**

No. The final requirements for the SIG program are intended to support interventions designed to turn around an entire school (or, in the case of the school closure model, provide better educational options to all students in a school). Removing a single grade from a high school to create a new school for that grade as part of a strategy to improve the performance of feeder schools would not meet this requirement for whole-school intervention. Similarly, to meet the requirement that a principal be replaced, the new principal must serve all grades in a school, not just one particular grade.

**E-18. How have the requirements for teacher and principal evaluation and support systems changed in the final requirements?**

Under both the 2010 SIG requirements and the final requirements, an LEA implementing the transformation model in a school must implement an educator evaluation system that incorporates student growth and is used to drive professional development and guide personnel decisions. The final requirements do not fundamentally change these requirements. Rather, the final requirements clarify that the Department's expectations for high-quality teacher and principal evaluation and support systems are consistent across Department programs and initiatives and that an LEA in an SEA with ESEA flexibility would ideally develop one system to meet both the SIG requirements and the ESEA flexibility requirements.

**E-19. Some SEAs with ESEA flexibility have received additional flexibility from the Department to delay full implementation of teacher and principal evaluation and support systems. In such an SEA, is an LEA that is implementing the transformation or early learning model required to implement the teacher and principal evaluation and support system in its first full year of implementation of the SIG model?**

Yes. An LEA may select among up to seven SIG models and should consider, in making its selection, whether it will be able to implement fully each requirement of that model. An LEA that chooses to implement the transformation or early learning model will receive up to two million dollars a year for up to five years and the Department expects and requires that the LEA will use those funds to meet each requirement of its selected model.

However, the Department recognizes the potential challenges an LEA may face in fully implementing a teacher and principal evaluation and support system under the transformation and early learning models in a case where an SEA has received flexibility from the Department to delay full implementation under ESEA flexibility. If, under this scenario, an LEA determines that implementing its evaluation and support system on a slightly different timeline than the SEA's timeline is unduly burdensome or unfeasible, then the Department would work with the SEA and LEA to determine the timeline for implementing the educator evaluation system requirements under the transformation and early learning models.

**5.) EVIDENCE-BASED WHOLE-SCHOOL REFORM Model (NEW - 2016):**

**L-1. For purposes of the SIG program, what is a whole-school reform model?**

Section I.A.3 of the final requirements defines "whole-school reform model" as a model that is designed to:

- (1) Improve student academic achievement or attainment;
- (2) Be implemented for all students in a school; and
- (3) Address, at a minimum and in a comprehensive and coordinated manner, each of the following:
  - o School leadership;
  - o Teaching and learning in at least one full academic content area (including professional learning for educators);
  - o Student non-academic support; and

- Family and community engagement.

**L-2. What are the evidence requirements for an evidence-based whole-school reform model?**

An evidence-based whole-school reform model must be supported by evidence of effectiveness including at least one study of the model that:

- (1) Meets What Works Clearinghouse evidence standards with or without reservations (*i.e.*, is a qualifying experimental or quasi-experimental study);\*
- (2) Found a statistically significant favorable impact on a student academic achievement or attainment outcome, with no statistically significant and overriding unfavorable impacts on that outcome for relevant populations in the study or in other studies of the intervention reviewed by and reported on by the What Works Clearinghouse; and
- (3) If meeting What Works Clearinghouse evidence standards with reservations, includes a large sample and a multi-site sample as defined in 34 C.F.R. § 77.1.

Multiple studies can cumulatively meet the large and multi-site sample requirements so long as each study meets the other requirements above.

**L-3. Which evidence-based whole-school reform models may LEAs implement?**

An LEA seeking to use SIG funds to implement an evidence-based whole-school reform model in a school must choose from among the models reviewed and identified by the Department as meeting applicable requirements. The Department intends to publish a list of such models and will notify SEAs when that list is available. (For more information on the review and identification process, see <http://www2.ed.gov/programs/sif/npr-wholeschreform.html>.)

Prior to approving the application of an LEA seeking to implement a selected evidence-based whole-school reform model, an SEA must ensure the appropriateness of the model by considering the extent to which the evidence supporting the model includes a sample population or setting similar to the population or setting of the school to be served (see I-2).

**L-4. With whom must an LEA partner to implement an evidence-based whole-school reform model?**

An LEA must implement an evidence-based whole-school reform model in partnership with a model developer. Section I.A.3 of the final requirements defines “whole-school reform model developer” as an entity or individual that:

- (1) Maintains proprietary rights for the model; or
- (2) If no entity or individual maintains proprietary rights for the model, has a demonstrated record of success in implementing a whole-school reform model (as defined in the final requirements) and is selected through a rigorous review process that includes a determination that the entity or individual is likely to produce strong results for the school.

Prior to approving the application of an LEA seeking to implement a selected evidence-based whole-school reform model, an SEA must consider the extent to which the model developer with whom the LEA proposes to partner meets the above definition (see I-2).

## **6.) EARLY LEARNING Model (NEW - 2016):**

### **M-1. What are the required elements of an early learning model?**

An early learning model is one in which an LEA does each of the following in an elementary school:

- (1) Offers full-day kindergarten;
- (2) Establishes or expands a high-quality preschool program;
- (3) Provides educators, including preschool teachers, with time for joint planning across grades to facilitate effective teaching and learning and positive teacher-student interactions;
- (4) Replaces the principal who led the school prior to commencement of the early learning model;
- (5) Implements a rigorous, transparent, and equitable evaluation and support system for teachers and principals, designed and developed with teacher and principal involvement;
- (6) Uses the teacher and principal evaluation and support system to identify and reward school leaders, teachers, and other staff who have increased student achievement and identify and remove those who, after ample opportunities, have been provided for them to improve their professional practice, have not done so;
- (7) Implements such strategies as financial incentives, increased opportunities for promotion and career growth, and more flexible work conditions that are designed to recruit, place, and retain staff with the skills necessary to meet the needs of students in the school, taking into consideration the results from the teacher and principal evaluation and support system;
- (8) Uses data to identify and implement an instructional program that—
  - a. Is research-based, developmentally appropriate, and vertically aligned from one grade to the next as well as aligned with State early learning and development standards and State academic standards; and
  - b. In the early grades, promotes the full range of academic content across domains of development, including math and science, language and literacy, socio-emotional skills, self-regulation, and executive functions;
- (9) Promotes the continuous use of student data (such as from formative, interim, and summative assessments) to inform and differentiate instruction in order to meet the educational and developmental needs of individual students; and
- (10) Provides staff ongoing, high-quality, job-embedded professional development such as coaching and mentoring (e.g., regarding subject-specific pedagogy, instruction that reflects a deeper understanding of the community served by the school, or differentiated instruction) that is aligned with the school's comprehensive instructional program and designed with school staff to ensure they are equipped to facilitate effective teaching and learning and have the capacity to implement successfully school reform strategies.

### **M-2. With respect to elements of the early learning model that are the same as elements of the turnaround or transformation models, do the definitions and other guidance that apply to those elements as they relate to the turnaround or transformation models also apply to those elements as they relate to the early learning model?**

Yes. Thus, for example, the strategies that are used to recruit, place, and retain staff with the skills necessary to meet the needs of students in a turnaround model may be the same strategies that are used to recruit, place, and retain staff with the skills necessary to meet the needs of students in an early learning model. For questions about any terms or strategies that appear in both the early learning model and the turnaround model, refer to the turnaround model section of this guidance. For questions about any terms or strategies that appear in both the early learning model and the transformation model, refer to the transformation model section of this guidance.

### **M-3. Must the required elements of the early learning model be implemented across all grades in an elementary school implementing the model?**

Yes, with two limited exceptions. The requirements that an LEA implementing an early learning model in a school offer full-day kindergarten and establish or expand a high-quality preschool program are limited in scope. All other requirements apply to all grades served by the elementary school implementing the early learning model, including the requirements to: implement rigorous, transparent, and equitable evaluation and support systems for teachers and



principals; implement such strategies as financial incentives, increased opportunities for promotion and career growth, and more flexible work conditions; and use data to identify and implement an instructional program that is research-based, developmentally appropriate, and vertically aligned from one grade to the next. The Department encourages LEAs implementing the early learning model to coordinate services across all grades in the school.

**M-4. What is the definition of “high-quality preschool program” as that term is used in the discussion of an early learning model?**

A “high-quality preschool program” means an early learning program that includes structural elements that are evidence-based and nationally recognized as important for ensuring program quality, including at a minimum:

- (1) High staff qualifications, including a teacher with a bachelor’s degree in early childhood education or a bachelor’s degree in any field with a State-approved alternate pathway, which may include coursework, clinical practice, and evidence of knowledge of content and pedagogy relating to early childhood, and teaching assistants with appropriate credentials;
- (2) High-quality professional development for all staff;
- (3) A child-to-instructional staff ratio of no more than 10 to 1;
- (4) A class size of no more than 20 with, at a minimum, one teacher with high staff qualifications;
- (5) A full-day program;
- (6) Inclusion of children with disabilities to ensure access to and full participation in all opportunities;
- (7) Developmentally appropriate, culturally and linguistically responsive instruction and evidence-based curricula, and learning environments that are aligned with the State early learning and development standards, for at least the year prior to kindergarten entry;
- (8) Individualized accommodations and supports so that all children can access and participate fully in learning activities;
- (9) Instructional staff salaries that are comparable to the salaries of local K-12 instructional staff;
- (10) Program evaluation to ensure continuous improvement;
- (11) On-site or accessible comprehensive services for children and community partnerships that promote families’ access to services that support their children’s learning and development; and
- (12) Evidence-based health and safety standards.

**M-5. What is the definition of “full-day” as that term is used in the early learning model?**

An LEA has discretion to determine how “full-day” is defined. However, in other Department programs, a “full day” is defined as a day that is equivalent to a full school day at the public elementary schools in the State and not fewer than five hours a day. The Department encourages an LEA implementing the early learning model in a school to adopt this definition.

**M-6. In addition to the required elements, what optional elements may also be a part of an early learning model?**

In addition to the required elements, an LEA implementing an early learning model may also implement other strategies, such as a high-quality, evidence-based literacy intervention or any of the permissible activities under one of the other models described in the final requirements. It could, for example, implement a literacy intervention using a reliable and valid screener to identify students who, after at least one year in school, are identified as being at risk of literacy failure. The key is that these actions would be taken within the framework of the early learning model and would be in addition to, and not instead of, the actions that are required of an early learning model.

**M-7. May an LEA provide home visiting services as part of its implementation of the early learning model in an elementary school?**

Yes. While it is not required to do so, an LEA may use SIG funds to provide evidence-based home visiting services under any of the SIG models, including the early learning model. Home visiting must be in addition to the strategies required as part of the early learning model.

**M-8. Is an LEA implementing the early learning model required to ensure adequate family and community engagement?**

Yes. In implementing any of the seven SIG models, including the early learning model, an LEA must engage families and the community in the selection of the SIG model and also meaningfully engage families and the community on a continuous basis throughout implementation. LEAs and schools may do this in a variety of ways, including, but not limited to: using surveys analyzing parent and community satisfaction, providing professional development to teachers about how to actively engage parents, and establishing organized parent and community groups.

**M-9. May a high-quality, community-based provider provide high-quality preschool services as part of the early learning model?**

Yes. As part of its implementation of the early learning model, an LEA may contract with a community-based provider to provide high-quality preschool programs for students enrolled in an elementary school implementing the model. Any SIG school working with a community-based provider should ensure coordination across all grades in the elementary school, including preschool, to ensure continuity of high-quality early learning and appropriateness of transitions into the elementary grades. An LEA may choose to use an external provider in implementing its early learning model, or enter into a partnership with various entities, such as an existing high-quality child care or Head Start program within the LEA or nearby community.

**M-10. Must a high-quality preschool program funded through SIG be physically located in the elementary school implementing the early learning model?**

No. A preschool is not required to be physically located in the implementing elementary school. However, all students participating in the preschool program must be enrolled in the SIG school that is implementing the early learning model to receive preschool services funded through the SIG program. Therefore, a preschool program that intends to send some, but not all, of its students to the SIG-participating elementary school implementing the early learning model may not be funded by SIG.

**M-11. May an LEA omit any of the actions outlined in the final requirements and implement its own version of an early learning model?**

No. An LEA implementing the early learning model in one or more of its schools must take all of the actions required by the final requirements. As discussed in M-6, an LEA may take additional actions to supplement, but not counteract, those that are required as part of the early learning model, but it may not implement its own version of an early learning model that does not include all of the elements required by the final requirements. Thus, an LEA could not, for example, only implement a preschool program without also taking the other actions specifically required as part of the early learning model.

**\*NOTE: RURAL FLEXIBILITY for Models:**

**G-11. Must a rural LEA implement each element of its selected model?**

Under certain circumstances, no. An LEA eligible for services under subpart 1 or 2 of part B of title VI of the ESEA (rural LEA) may choose to modify one element of the turnaround or transformation model so long as the modification still results in the LEA's meeting the intent and purpose of the original element. For example, if a rural LEA applying to implement a turnaround model seeks to modify the element of the model that requires the LEA to replace the principal, the LEA must demonstrate in its application how it will ensure strong leadership in the school. The LEA could do this by demonstrating to the SEA that the current principal has a track record in improving student achievement and has the experience and skills needed to implement the intervention.