

**Colorado Department of Education  
Allocation of 2009 and ARRA School Improvement Funds  
Guidance for Districts**

**Memorandum**

**To:** District Superintendents  
**From:** Colorado Department of Education  
**Re:** Allocation of 2009 and ARRA School Improvement Funds  
**Date:** March 26, 2010

Through Title I of the Elementary and Secondary Education Act and the American Recovery and Reinvestment Act of 2009, the federal government will make approximately \$37 million available to Colorado to substantially raise the achievement of students in the state's lowest performing schools. Through these "1003(g) funds," districts will be eligible to receive \$50,000 to \$500,000 for each of their eligible schools.

This historic federal investment in school improvement presents an enormous opportunity to turn around our state's persistently lowest-achieving schools and dramatically improve outcomes for our students. The Colorado Department of Education is eager to work with districts, schools and local communities to support rigorous interventions that have great promise for producing rapid improvements in student experiences and learning outcomes.

This memo outlines steps that the CDE will follow in working with districts to allocate 1003(g) funds in districts and schools most in need of improvement, including:

1. Identifying the state's lowest-achieving Title I (and Title I-eligible) schools
2. Conducting intervention selection assessments
3. Developing applications that align with federal and CDE priorities for 1003(g) funds
4. Providing support to district applicants

These steps are based on the final federal requirements (published in the Federal Register December 10, 2009).<sup>1</sup> The requirements are effective February 8, 2010.

**1. CDE identifies schools in most need of assistance**

In awarding 1003(g) School Improvement funds, the state will give priority to LEAs with the lowest-achieving schools that are in improvement status, corrective action or restructuring and show the greatest need for the funds and strongest commitment to carrying out dramatic reform.

"Greatest need" is defined by three tiers:

*Tier I:* The lowest-achieving five percent of Title I schools or the lowest-achieving five Title I schools (whichever is greater) in improvement, corrective action or restructuring, and high schools with graduation rates less than 60% over a number of years.

*Tier II:* Schools providing secondary education that are as low-achieving as Tier I schools and are eligible for, but do not currently receive, Title I funds.

*Tier III:* All Title I schools in improvement, corrective action or restructuring that are not Tier I schools.

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<sup>1</sup> School Improvement Grants; American Recovery and Reinvestment Act of 2009 (ARRA); Title I of the Elementary and Secondary Education Act of 1965, as Amended (ESEA), 74 Fed. Reg. 65,618 (Dec. 10, 2009) (codified at 34 C.F.R. subtit. B, ch. II).

Colorado has identified schools in each tier according to both (1) performance on the CSAP in reading/language arts and mathematics and (2) comparison of student gains on the CSAP with the average gains of schools in the state between 2007 and 2009 using the Colorado Growth Model.

CDE will notify districts in which schools have been identified as belonging to one of these three tiers. Each identified district may then apply for 1003(g) funds on behalf of its eligible schools. In its application, a district must demonstrate its commitment to using these funds to provide adequate resources to each Tier I and Tier II school it commits to serve. Districts must serve Tier I schools first, but CDE will give priority to districts that propose to serve both Tier I and Tier II schools in their applications.

## **2. External partners conduct needs assessments in each eligible school**

Districts that receive 1003(g) funds are required to implement one of four rigorous interventions in each identified school: closure, restart, turnaround or transformation. Districts must begin by analyzing the needs of identified schools to match them with the most appropriate intervention. The CDE will facilitate Expedited Diagnostic Reviews (EDRs) in each Tier I school and Tier II and III schools as capacity and funding allow, to provide the necessary data and findings to help districts and CDE jointly determine each school's specific strengths and needs as well as the feasibility of each option for intervention.

EDRs will be conducted by external partners and overseen by the CDE. These reviews will examine how a school is functioning with respect to six standards of school performance:

- Curriculum
- Assessment
- Instruction
- School culture
- Professional development
- Leadership / planning

EDR teams will be comprised of experienced educators trained in observation and assessment of school processes. An EDR team will spend two or three days in a school, conducting interviews and observing classrooms. After this on-site review, and based on document analysis, interviews, and observations, the EDR team will create and submit an EDR Report to the CDE. These EDR Reports will reveal school-level patterns and trends (not individual assessments), and include aggregated data. These reports will be based on observations and facts and not opinion.

The CDE will schedule meetings with the district superintendent to review the findings of the EDR. Once the results have been turned over to the district, the superintendent will have the option of sharing the findings with members of the school staff.

## **3. Districts and CDE co-develop applications that align with federal and CDE priorities for 1003(g) funds**

In addition to prioritizing areas of greatest need and working to match schools with the most appropriate intervention option, CDE will co-develop applications with identified districts that demonstrate the district's commitment and capacity to carry out rigorous interventions in identified schools. CDE will evaluate each district's commitment according to several criteria, outlined below. Specific guidance about the required content of written applications is forthcoming.

Criteria	Description
Commitment to dramatic change	<p>In awarding 1003(g) School Improvement funds, CDE will evaluate each district's commitment according to its dedication to implementing one of four specific interventions in each Tier I and Tier II school that it commits to serve. These interventions include:</p> <ul style="list-style-type: none"> <li>▪ <i>Restart</i>: Close and reopen the school under the management of a charter school operator, charter management organization, or educational management organization.</li> <li>▪ <i>Turnaround</i>: Replace the principal and at least 50 percent of staff, adopt a new governance structure and implement comprehensive, research-based instructional programs.</li> <li>▪ <i>Transformation</i>: Replace the principal, implement comprehensive instructional reform strategies, extend learning and teacher planning time, and provide operating flexibility.</li> <li>▪ <i>Closure</i>: Close the school and enroll students in high-achieving schools in the district.</li> </ul> <p>More details about the specific elements of each of these interventions appear in Appendix I. These elements include those identified by the Federal Department of Education in 1003(g) guidance as well as specific CO priorities established in SB09-163.</p>
Demonstrated capacity	<p>CDE will also consider a district's capacity to carry out proposed interventions in targeted schools, including supply of leaders, teachers and school providers; detailed dissolution and dispersal plan for school closures; capacity to administer and track interim assessments; capacity to engage in significant mid-course corrections (including by replacing key staff, leadership or external providers) if data do not indicate significant progress toward achievement benchmarks within the first year; and quality of instructional programs and standards-based curriculum.</p>
Governance reform	<p>CDE will consider a district's commitment and capacity to establish oversight structures for identified schools outside of normal district constraints that will ensure necessary freedom and support, such as a separate district office, staffed by a person that has been given significant autonomy to make critical decisions that impact student achievement, reports to the district superintendent and has contracting and other authorities, or a contract with a Lead Turnaround Partner.</p>
Ensuring flexibility	<p>CDE will consider a district's commitment to ensure necessary flexibility for identified schools. Many of these flexibilities are required elements of the intervention models outlined above. For all schools, they will include flexibility over scheduling of school day and year; principal autonomy over staff hiring, firing and placement; and greater authority over budgeting at the school level. Districts may provide these flexibilities by obtaining innovation school/zone status, converting a school to charter status, or obtaining specific waivers from district policy or negotiated agreements as necessary.</p>
Aligned resources	<p>CDE will consider a district's commitment to align current and future funding sources in support of improvement goals, including its commitment to identify and reallocate existing district funds for the purpose of sustaining the improvement work after federal funds expire.</p>

Performance monitoring	CDE will consider a district’s commitment and capacity to hold schools accountable for results. Specifically, districts must include in their application three year student achievement goals in reading/language arts and mathematics. Each Tier I and Tier II school the district commits to serve must be held accountable for meeting or being on track to meet those goals for all students and in each student subgroup. In addition, districts must hold schools accountable for making progress on leading indicators (see step #4 below). In schools where the district proposes a “restart” model, it must also describe how it will hold the charter school operator, CMO or EMO accountable for meeting or being on track to meet student achievement goals and making progress on leading indicators.
District and community support	CDE will consider a district’s demonstrated backing for necessary changes to accompany dramatic reform, as evidenced through support from the school board, superintendent, and/or the local teachers’ union.
Sustainability	Finally, CDE will consider evidence of the district’s plan to sustain gains in student achievement beyond three years; and to commit one-time funds strategically to enable future interventions in other low-performing schools.

**4. CDE provides support to district applicants**

CDE will provide several types of support to districts to assist them in developing their applications, planning for the proposed intervention in each school and carrying out dramatic change. These include:

- A list of state-approved providers from which the district will select to manage or assist schools that implement the “turnaround,” “transformation” or “restart” options;
- Principles to guide school closure and student reassignment;
- Guiding principles for districts to align current and future resources with the goals of their targeted improvement efforts;
- A list of approved student assessments that are aligned to state standards, for districts to put in place in each identified school; and
- Performance monitoring tools, including a defined set of leading indicators to monitor in the first few months and weeks of the intervention; interim student performance targets; and overall performance targets for identified schools over the 3-year grant period.

**Overview of timeline and process**

In September, CDE notified leaders in districts where identified schools are located of their eligibility to apply for 1003(g) funds on behalf of their schools.

Throughout late 2009 and early 2010, CDE is working with districts in which identified schools are located to co-develop plans for intervention and district capacity and supports.

CDE will release formal RFPs based on the criteria outlined above as soon as the state is authorized to do so.

## Appendix I: Required Elements of Each Intervention Option

The elements outlined in the table below include those required by the Federal Department of Education in 1003(g) guidance as well as specific Colorado priorities established in SB09-163.

Intervention	Required Elements
Restart	<ul style="list-style-type: none"> <li>▪ Convert the school or close the school and reopen it under the management of a charter school operator, a charter management organization (CMO) or an educational management organization (EMO) that has been selected through a rigorous review process</li> <li>▪ A CMO is a non-profit organization that operates or manages charter schools by centralizing or sharing certain functions and resources among schools. An EMO is a for-profit or non-profit organization that provides “whole-school operation” services to an LEA</li> <li>▪ Enroll, within the grades the school serves, any former student who wishes to attend</li> </ul>
Turnaround	<ul style="list-style-type: none"> <li>▪ Replace the principal</li> <li>▪ Obtain Innovation School status or otherwise provide the new principal sufficient operational flexibility (including in staffing, calendars/time and budgeting) to implement fully a comprehensive approach to improving student achievement and increasing graduation rates</li> <li>▪ Use locally adopted competencies to screen all staff and replace at least 50 percent of the staff</li> <li>▪ Incorporate strategies designed to recruit, place and retain effective staff</li> <li>▪ Provide ongoing, high-quality job-embedded professional development designed to ensure that staff members are equipped to facilitate effective teaching and learning</li> <li>▪ Adopt a new governance structure, such as reporting to a new “turnaround office” in the LEA or SEA, allowing a turnaround leader to report directly to the Superintendent, or enter into a contract with Lead Turnaround Partner to oversee the school</li> <li>▪ Use data to identify and implement comprehensive, research-based instructional programs that are vertically aligned from one grade to the next, and that align with the state’s academic standards</li> <li>▪ Promote the continuous use of student data (such as formative, interim and summative student assessments) to inform and differentiate instruction to meet the academic needs of individual students</li> <li>▪ Use evaluations that are based in significant measure on student growth to improve teachers’ and school leaders’ performance</li> <li>▪ Establish schedules and strategies that use a longer school day, week, or year to increase time for (a) instruction in core academic subjects, (b) instruction in other subjects and enrichment activities, and (c) teacher collaboration, planning, and professional development within and across grades and subjects</li> <li>▪ Provide appropriate social-emotional and community-oriented services and supports for students</li> <li>▪ A turnaround model may include any of the required and permissible activities under the transformation model and may be a new school model</li> </ul>

Transformation	<ul style="list-style-type: none"> <li>▪ <b>Develop teacher and school leader effectiveness by:</b> <ul style="list-style-type: none"> <li>- Replacing the principal who led the school prior to commencement of the transformation model</li> <li>- Using rigorous, transparent, and equitable evaluation systems for teachers and principals that take into account data on student growth as a significant factor and that are designed and developed with teacher and principal involvement</li> <li>- Identifying and rewarding school leaders, teachers, and other staff who increase student achievement and high school graduation rates and identify and remove those who, after ample opportunities have been provided to improve their professional practice, have not done so</li> <li>- Providing ongoing, high-quality job-embedded professional development designed to ensure that staff members are equipped to facilitate effective teaching and learning</li> <li>- Implementing strategies designed to recruit, place, and retain effective staff</li> </ul> </li> <li>▪ <b>Implement comprehensive instructional reform strategies by:</b> <ul style="list-style-type: none"> <li>- Using data to identify and implement comprehensive, evidence-based, instructional programs that are vertically aligned from one grade to the next as well as aligned with State academic standards</li> <li>- Promoting the continuous use of student data (such as from formative, interim, and summative assessments) to inform and differentiate instruction to meet the academic needs of individual students</li> </ul> </li> <li>▪ <b>Extend learning time and create community-oriented schools by:</b> <ul style="list-style-type: none"> <li>- Providing more time for students to learn core academic content by expanding the school day, the school week or the school year, and increasing instructional time for core academic subjects during the school day</li> <li>- Providing more time for students to learn other subjects and participate in enrichment activities</li> <li>- Providing more time for teachers to collaborate, plan, and engage in professional development within and across grades and subjects</li> <li>- Providing ongoing mechanisms for family and community engagement</li> </ul> </li> <li>▪ <b>Provide operating flexibility and sustained support by:</b> <ul style="list-style-type: none"> <li>- Obtaining Innovation School status or otherwise ensuring sufficient operating flexibility (including in staffing, calendars/time, and budgeting) to implement fully a comprehensive approach to substantially improve student achievement outcomes</li> <li>- Ensuring that the school receives ongoing, intensive technical assistance and related support from the LEA, the SEA, or a designated external lead partner organization.</li> </ul> </li> </ul>
Closure	<ul style="list-style-type: none"> <li>▪ Close the school and enroll the students who attended the school in other, higher-achieving schools within reasonable proximity to the closed school.</li> <li>▪ Schools enrolling students from closed schools may include, but are not limited to, new schools and charter schools.</li> </ul>