



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

May 1, 2014

The Honorable Glenda Ritz
Indiana Superintendent of Public Instruction
Indiana Department of Education
PNC Building, South Tower, Suite 600
115 West Washington Street
Indianapolis, IN 46204

Dear Superintendent Ritz:

Thank you for your efforts over the past two years in implementing local and State-led reforms to support improved teaching and learning for all students, particularly historically disadvantaged student subgroups. As you know, the U.S. Department of Education (ED) offered flexibility from specific requirements of the No Child Left Behind Act of 2001 (NCLB) in exchange for rigorous and comprehensive State-developed plans designed to improve educational outcomes for all students, close achievement gaps, increase equity, and improve the quality of instruction.

I am writing with respect to two very important matters concerning the Indiana Department of Education's (IDOE) implementation of its flexibility request under the Elementary and Secondary Education Act of 1965, as amended (ESEA flexibility). First, I am placing a condition on IDOE's ESEA flexibility request due to the number of significant issues from our Part B monitoring of IDOE's implementation of ESEA flexibility. Second, IDOE must submit a high-quality plan for how it will implement college- and career-ready content standards and aligned assessments consistent with the principles of ESEA flexibility during the 2014–2015 school year. Each of these matters is discussed more fully below.

Condition with respect to ESEA flexibility Part B monitoring

As you know, during early fall, my office monitored IDOE's implementation of ESEA flexibility and determined that IDOE had not demonstrated that its implementation of ESEA flexibility was consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled *ESEA Flexibility*. The report concludes, for example, that IDOE:

- did not ensure that focus schools were implementing interventions to close achievement gaps for their lowest-achieving subgroups;
- did not ensure that all priority schools were implementing all turnaround principles concurrently; and

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- did not have adequate processes to monitor implementation of college- and career-ready standards or teacher and principal evaluation and support systems in its local educational agencies (LEAs).

For these and other areas under review, the monitoring report identifies a number of “next steps” that IDOE must take, or demonstrate that it has taken, to meet the principles of ESEA flexibility and implement reforms to improve student achievement and increase the quality of instruction. I am enclosing a copy of the Part B monitoring report for your information, planning, and action.

Based on the number of significant “next steps” in the monitoring report, I am placing a condition on the approval of IDOE’s ESEA flexibility request. In order to have this condition removed, IDOE must address all “next steps” in the monitoring report and submit evidence that it has done so as part of its extension request. If IDOE is not able to resolve these issues and meet its commitments under ESEA flexibility, ED may take additional enforcement action, including declining to approve an extension of ESEA flexibility for Indiana. The Department stands ready to assist Indiana to sufficiently address the issues detailed below.

Adoption and implementation of college- and career-ready standards and assessments

I understand that the Indiana legislature recently enacted legislation that impacts IDOE’s implementation of its ESEA flexibility request. Specifically, this legislation requires that (1) “before July 1, 2014, the state board shall adopt Indiana college- and career-readiness educational standards, voiding the previously adopted set of standards” and that (2) LEAs administer the Indiana Statewide Testing for Educational Progress Plus (ISTEP+) assessments through the 2014–2015 school year.

To meet the standards requirements of ESEA flexibility, a State educational agency (SEA) must have adopted college- and career-ready standards in at least reading/language arts and mathematics for kindergarten through grade 12 at the time of its request, and must have implemented those standards no later than the 2013–2014 school year. ED provided an SEA with two options for meeting this requirement. An SEA could either (1) adopt college- and career-ready standards that are common to a significant number of States or (2) adopt college- and career-ready standards that are approved by a State network of institutions of higher education (IHEs), which must certify that students who meet the standards will not need remedial course work at the postsecondary level. IDOE met these requirements in its approved ESEA flexibility request through the 2013–2014 school year by adopting and implementing standards common to a significant number of States. Because the IDOE will no longer implement those standards, IDOE must amend its ESEA flexibility request and provide evidence that its new standards are certified by a State network of IHEs that students who meet the standards will not need remedial coursework at the postsecondary level.

To meet the assessment requirements of ESEA flexibility, an SEA must develop annual Statewide, high-quality assessments, and corresponding academic achievement standards, in reading/language arts and mathematics in grades 3 through 8 and once in high school, and fully implement those assessments no later than the 2014–2015 school year. Among other characteristics, a high-quality assessment must be valid, reliable, and fair for its intended purposes, aligned with a State’s college- and career-ready content standards, and provide an accurate measure of student growth over a full academic year or course.

ED provided an SEA with three options to address how it would meet these requirement: (1) participate in one of the two State assessment consortia — *i.e.*, Partnership for Assessment of Readiness for College

and Careers (PARCC) or the Smarter Balanced Assessment Consortium (SBAC); (2) if the SEA is not in a consortium and has not yet developed high-quality assessments, provide the SEA's plan to develop and administer those assessments no later than the 2014–2015 school year; or (3) if the SEA is not in a consortium but has developed high-quality assessments, provide evidence that the SEA submitted those assessments to ED for peer review or provide a timeline of when the SEA will submit them for peer review. In its approved ESEA flexibility request, IDOE met these requirements through its participation in PARCC.

Because IDOE no longer plans to administer the PARCC assessments in 2014–2015, IDOE must amend its approved request for ESEA flexibility to reflect its new plan to administer high-quality assessments aligned to IDOE's college- and career-ready standards in the 2014–2015 school year. The amendment must include a high-quality plan that details the steps IDOE will take to administer in the 2014–2015 school year high-quality assessments, as defined in the document titled *ESEA Flexibility* (available at: <http://www.ed.gov/esea/flexibility/documents/esea-flexibility-acc.doc>), in reading/language arts and mathematics that are aligned with IDOE's new college- and career-ready standards. As described in the *ESEA Flexibility Review Guidance* (available at: <http://www.ed.gov/esea/flexibility/documents/review-guidance.doc>), such a plan must include, at a minimum, for each key component of the plan, the following elements: (1) key milestones and activities, (2) a detailed timeline, (3) the party or parties responsible, (4) evidence, (5) resources, and (6) significant obstacles. Generally, an SEA's plan to develop and administer high-quality assessments should, at a minimum, address the following key components:

- the process and timeline for development of test blueprints and item specifications;
- the review and selection of items for inclusion in the assessments (including through piloting);
- scaling and scoring procedures to be used;
- test administration procedures, including selection and use of appropriate accommodations;
- data analyses proposed to document validity and reliability of the assessments;
- an independent evaluation of alignment of the assessments with the State's college- and career-ready standards;
- the process and timeline for setting college- and career-ready achievement standards and the method and timeline to validate those achievement standards; and
- meaningful report formats to communicate results to students, parents, and educators.

In its ESEA flexibility request, IDOE also assured that it would develop and administer, no later than the 2014–2015 school year, alternate assessments based on grade-level academic achievement standards or alternate assessments based on alternate academic achievement standards for students with the most significant cognitive disabilities that are consistent with 34 C.F.R. § 200.6(a)(2) and are aligned with the State's college- and career-ready standards. Because IDOE will have new college- and career-ready content standards, IDOE's plan must also address how it will ensure that it will administer an alternate assessment aligned with those standards in the 2014–2015 school year. It is important to note that the IDOE must submit its new assessments for peer review as soon as that process is reinstated by ED.

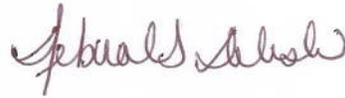
To amend its approved request for ESEA flexibility, IDOE must submit both the amendment request template (available at: <http://www2.ed.gov/policy/elsec/guid/esea-flexibility/index.htm>), and a redlined version of its currently approved request reflecting its changed approach to adopting and implementing college- and career-ready standards and developing and administering high-quality assessments. (The high-quality plan regarding development of new assessments described above may either be inserted

into the redlined request or submitted as an attachment to the redlined request.) IDOE must submit this amendment request **no later than 60 calendar days from the date of this letter** and may submit it as part of an extension request.

In the coming days, a member of my staff will contact Jeff Coyne, your ESEA flexibility lead, to check in regarding your amendment request. In the meantime, please refer to the document titled *ESEA Flexibility Amendment Submission Process* (available at: <http://www2.ed.gov/policy/eseaflex/amendment-submission-process.doc>), which describes the steps that are necessary as part of requesting an amendment. Please do not hesitate to contact Dave English at dave.english@ed.gov or Matthew Stern at matthew.stern@ed.gov if you have any questions.

I appreciate your continued focus on enhancing education for all of Indiana's students.

Sincerely,



Deborah S. Delisle
Assistant Secretary

Enclosure



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The Honorable Glenda Ritz
Indiana Superintendent of Public Instruction
Indiana Department of Education
PNC Building, South Tower, Suite 600
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Indianapolis, IN 46204

MAY 1 2014

Dear Superintendent Ritz:

During August 21-22, 2013, a team from the U. S. Department of Education's (ED) Office of Elementary and Secondary Education conducted Part B monitoring of the Indiana Department of Education's (IDOE) implementation of its approved ESEA flexibility request. Part B monitoring aims to continue the collaborative relationship begun during the request approval process, provide ED with a deeper understanding of each State educational agency's (SEA) goals and approaches to implementing ESEA flexibility, and ensure that the SEA has the critical elements of ESEA flexibility in place to continue implementation of its plan.

The review focused on the following ESEA flexibility elements:

- SEA Systems and Processes, including Monitoring, Technical Assistance, Data Collection and Use, and Family & Community Engagement and Outreach
- Transitioning to and Implementing College- and Career-ready Standards
- Adopting English Language Proficiency Standards
- Developing and Administering High-Quality Assessments
- Developing and Administering Alternate Assessments
- Developing and Administering English Language Proficiency Assessments
- Annually Reporting College-going and College-credit Accumulation Rates
- Developing and Implementing a State-Based System of Differentiated Recognition, Accountability, and Support
- Reward, Priority, Focus, and Other Title I Schools
- State and Local Report Cards
- Teacher and Principal Evaluation and Support Systems.

Enclosed is a report based upon this review. The report includes highlights of IDOE's implementation of ESEA flexibility and, for each indicator, a snapshot of IDOE's progress in implementing ESEA flexibility. If appropriate, the report also includes "next steps" that were discussed with the SEA during an exit conference conducted on September 19, 2013 to ensure that IDOE implements flexibility consistent with its approved request and the timelines and principles of ESEA flexibility. IDOE should respond to the "next steps" within 60 days after receipt of this report, as part of its ESEA flexibility

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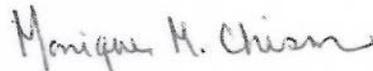
extension request, or as otherwise indicated in the Part B report. This report will be posted on the ESEA flexibility website.

In the coming months ED will issue a comprehensive summary of each SEA's implementation of ESEA flexibility that includes information gathered through the Part B monitoring process and provides more detail about the innovative practices and common challenges that States are facing as they engage in the effective implementation of ESEA flexibility.

If you have any questions or there are ways that ED staff can provide you additional support as you move forward in implementing your ESEA flexibility request, please feel free to reach out to your ESEA flexibility contact.

I look forward to continuing our work with you as you implement your ESEA flexibility request. Thank you for your commitment to Indiana's children.

Sincerely,



Monique M. Chism, Ph.D.
Director
Student Achievement and School
Accountability Programs

Enclosure

cc: Jeffrey Coyne

ESEA FLEXIBILITY PART B MONITORING REPORT

MONITORING VISIT INFORMATION	
State Educational Agency (SEA)	<i>Indiana Department of Education (IDOE)</i>
Request Approved	<i>February 9, 2012</i>
Request Amended	<i>N/A</i>
ESEA Flex Monitoring Activity	<i>Part B Onsite Monitoring</i>
Monitoring Review Date(s)	<i>August 21-22, 2013</i>
Exit Conference	<i>September 19, 2013</i>
Interviews Conducted	<p><i>IDOE Staff:</i> <i>Heather Baker, Becky Bowman, Teresa Brown, Wes Bruce, Jeff Coyne, Rachel Davidson, Leslie Fatum, Charlie Geier, Debbie Goodblood-Dailey, Amy Horton, Cindy Hurst, Laura Naughton, Kristin Reed, Risa Regnier, Scott Reske, Superintendent Glenda Ritz, Leroy Robinson, Danielle Shockey, Kristan Sievers-Coffer, Joshua Towns, Michele Walker, Peggy Wild</i></p> <p><i>Fort Wayne Community Schools Staff:</i> <i>Ann Barnes-Smith, Tim Bobay, Jack Byrd, Laura Cain, Jeff King, Wendy Robinson, Emily Schwartz Keirns</i></p>
U.S. Department of Education (ED) Monitors	<i>Dave English, Melissa Turner</i>

OVERVIEW OF ESEA FLEXIBILITY MONITORING

The U.S. Department of Education (ED) is committed to supporting State educational agencies (SEAs) as they implement ambitious reform agendas through their approved ESEA flexibility requests. Consistent with this commitment, ED has designed a monitoring process to assess an SEA's implementation of the principles of ESEA flexibility and the State-level systems and processes needed to support that implementation.

Part B Monitoring

In Part B monitoring, SEA implementation of ESEA flexibility was reviewed across several key areas: State-level Systems and Processes, Principle 1, Principle 2, and Principle 3, as outlined in the *ESEA Flexibility Part B Monitoring Protocol*. In each broad area, ED identified key elements that are required under ESEA flexibility and are likely to lead to increased achievement for students. Through examination of documentation submitted by the SEA and interviews with SEA staff, ED assessed the effectiveness of implementation of ESEA flexibility by identifying the extent to which an SEA:

1. Is ensuring that implementation is occurring consistent with the SEA's approved request and the principles and timelines of ESEA flexibility.
2. Is continuing to review and make adjustments to support implementation.

3. Is establishing systems and process to sustain implementation and improvements.

The report contains the following sections:

- *Highlights of the SEA's Implementation.* This section identifies key accomplishments in the SEA's implementation of ESEA flexibility.
- *Status of Implementation of ESEA Flexibility.* This section indicates whether or not the SEA has met expectations for each element of ESEA flexibility.
- *Elements Requiring Next Steps.* When appropriate, this section identifies any elements where the SEA is not meeting expectations and includes "Next Steps" that the SEA must take to meet expectations.
- *Recommendations to Strengthen Implementation.* This section provides recommendations to support the SEA in continuing to meet the principles and timelines of ESEA flexibility and strengthening implementation.
- *Additional Comments.* When appropriate, this section includes any additional information related to the SEA's implementation of ESEA flexibility not included elsewhere.

HIGHLIGHTS OF IMPLEMENTATION OF ESEA FLEXIBILITY

The SEA's work includes the following key accomplishments relating to the implementation of ESEA flexibility and/or efforts to engage in a process of continuous review and analysis, particularly for those elements receiving a comprehensive review:

- IDOE has developed and posted to its website a robust series of tutorial videos to build the capacity of all teachers to successfully write and implement Student Learning Objectives (SLOs), one of three measures of student growth under IDOE's new teacher evaluation system (including individual student growth and school-wide growth based on annual standardized assessment results).

STATUS OF IMPLEMENTATION OF ESEA FLEXIBILITY

SEA Systems & Processes

Element	Status
Monitoring (EDGAR 80.40 and 2.G)	Not Meeting Expectations
Technical Assistance (2.G)	Not Meeting Expectations
Data Collection & Use (§9304(a)(6))	Meeting Expectations
Family & Community Engagement and Outreach (Implementation Letter)	Not Meeting Expectations

Principle 1

Element	Status
Transition to and Implement College- and Career-ready Standards (1.B)	Not Meeting Expectations
Adopt English Language Proficiency Standards (Assurance 2)	Meeting Expectations
Develop and Administer High-Quality Assessments (Assurance 3)	Not Meeting Expectations
Develop and Administer Alternate Assessments (Assurance 3)	Meeting Expectations

Develop and Administer English Language Proficiency Assessments (Assurance 4)	Meeting Expectations
Annually Reports College-going and College-credit Accumulation Rates (Assurance 5)	Meeting Expectations

Principle 2

Element	Status
Develop and Implement a State-Based System of Differentiated Recognition, Accountability, and Support (2.A)	Meeting Expectations
Reward Schools (2.C)	Meeting Expectations
Priority Schools (2.D)	Not Meeting Expectations
Focus Schools (2.E)	Not Meeting Expectations
Other Title I Schools (2.F)	Meeting Expectations
State and Local Report Cards (§1111 of the ESEA; 2.B and Assurance 14)	Meeting Expectations

Principle 3

Element	Status
Teacher Evaluation and Support Systems (3.B)	Not Meeting Expectations
Principal Evaluation and Support Systems (3.B)	Not Meeting Expectations

ELEMENTS REQUIRING NEXT STEPS

Element	Monitoring
Summary and Status of Implementation	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i> and the Education Department General Administrative Regulations (EDGAR) 80.40.</p> <p>IDOE does not have a process in place to monitor implementation of college- and career-ready standards.</p> <p>Similarly, IDOE does not have a process in place to review local educational agency (LEA) teacher and principal evaluation systems nor monitor implementation of these systems, which were required by Indiana law to be implemented by the 2012-2013 school year. IDOE does require each LEA to submit its evaluation plan and provide an assurance that it aligns with the requirements of ESEA flexibility; however, the SEA does not have a process in place to review the evaluation plans or implementation at the LEA level.</p>
Next Steps	<p>As part of its ESEA flexibility extension request, IDOE must amend its ESEA flexibility request to include a high-quality plan (see pp. 2-3 of “ESEA Flexibility Review Guidance” at: http://www2.ed.gov/policy/elsec/guid/esca-flexibility/index.html for elements of a high-quality plan) for the process it will use to (see next page):</p>

Element	Monitoring
	<ul style="list-style-type: none"> • Monitor the status of implementation of CCR standards for all students during the 2013-2014 school year and beyond; and • Review teacher and principal evaluation systems submitted by LEAs and monitor their implementation, including ensuring that systems meet all ESEA flexibility requirements, beginning in the 2014-2015 school year.

Element	Technical Assistance
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i> and sections 1111(b)(8) and 1117 of the Elementary and Secondary Education Act of 1965, as amended (ESEA). SEAs are required, for all ESEA flexibility principles to “establish a statewide system of intensive and sustained support and improvement for local educational agencies” including assisting LEAs to develop the capacity to comply with ESEA flexibility requirements.</p> <p>To support its transition to college- and career-ready (CCR) standards, IDOE “...committed to ensuring that English language learners and students with disabilities have equal access to the College-and-Career ready Standards...” However, IDOE has not carried out its plan.</p> <p>Additionally, with regard to Principle 3, the SEA described, in its approved ESEA flexibility request, a system of ongoing targeted assistance supported by two representatives of the Office of Educator and Effectiveness Leadership (EEL) per region (eight total); however, during the monitoring event, IDOE indicated that ongoing technical assistance was being provided to LEAs on a request basis only, by one EEL staff member. Additionally, due to capacity issues, the SEA is not providing ongoing technical assistance to LEAs based on the review of educator evaluation systems.</p>
<p>Next Steps</p>	<p>As part of its ESEA flexibility extension request, IDOE will amend its ESEA flexibility request to include a high-quality plan to:</p> <ul style="list-style-type: none"> • Provide technical assistance and support to LEAs to support all students, including students with disabilities and English Learners, in the transition to CCR standards as described below in the next steps for “Transition to and Implement College- and Career-Ready Standards”; and • Provide technical assistance to LEAs regarding the design and implementation of teacher and principal evaluation systems based on reviews of LEA evaluation systems and results of monitoring activities as described above in “Monitoring”, including steps for developing SEA capacity to provide such support.

Element	Family & Community Engagement and Outreach
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>.</p> <p>Through the calendar year 2012, IDOE regularly assembled a formal teacher advisory group that informed the development of the ESEA flexibility request submission and ongoing implementation issues; however, since 2012, IDOE has not conducted formal outreach through stakeholder groups representing teachers or parents, to ensure that teacher, parents and other stakeholders understand the implications of ESEA flexibility, for LEAs, schools, parents and students, and to help to inform the implementation of the SEA's approved ESEA flexibility request on an ongoing basis.</p>
<p>Next Steps</p>	<p>As part of its ESEA flexibility extension request, the SEA will submit an amendment including a high-quality plan to:</p> <ul style="list-style-type: none"> • Meaningfully engage and solicit input from teachers and their representatives and other diverse stakeholders on an ongoing basis to inform SEA implementation of its ESEA flexibility request; and • Ensure that teachers, parents, including parents of students with disabilities and English Learners, and other diverse stakeholders understand the implications of the SEA's ESEA flexibility plan for LEAs, schools, teachers, and students.

Element	Transition to and Implement College- and Career-Ready Standards
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>, which states that "...an SEA must demonstrate that it has college- and career-ready expectations for all students [including English Learners and students with disabilities] in the State by adopting college- and career-ready standards in at least reading/language arts and mathematics, [and] transitioning to and implementing such standards statewide for all students and schools..." by the 2013-2014 school year.</p> <p>To support the transition of English Learners to CCR standards in 2013-2014, IDOE committed, in its approved ESEA flexibility request to adopt English language proficiency (ELP) standards and "formalize and provide additional technical assistance and supports statewide" including guidance regarding aligning new ELP standards with English/language arts standards; however, at the time of the monitoring event, IDOE had not adopted ELP standards and was in the process of developing a formal plan for the provision of training and support materials to educators, for delivery beginning the second semester of the 2013-2014 school year. <i>Subsequent to the monitoring event, on October 30, 2013,</i></p>

Element	Transition to and Implement College- and Career-Ready Standards
	<p data-bbox="414 262 1323 336"><i>IDOE adopted the World-Class Instructional Design and Assessment (WIDA) ELP standards and provided a timeline for the delivery of training and support materials.</i></p> <p data-bbox="414 367 1380 714">To support students with disabilities in their transition to CCR standards, IDOE committed to utilizing its technical assistance centers to provide a series of training activities to prepare all teachers to instruct students with disabilities in the context of new CCR standards beginning in the 2013-2014 school year. IDOE provided targeted professional development to only a limited number of LEAs that applied for its “Project Success” program. IDOE indicated during the monitoring event that it had partnered with a contractor to commence a series of train-the-trainer regional meetings in the future and to facilitate the development and delivery of professional development modules supporting the transition of students with disabilities to CCR standards.</p> <p data-bbox="414 745 1380 1092">The SEA has not developed or delivered to educators various support materials described in its approved request. For students with disabilities assessed against grade level standards, IDOE committed to developing guidance materials to assist LEAs in selecting and administering instructional and assessment accommodations in the context of the new standards. For students with severe cognitive disabilities tested against alternate achievement standards, the SEA indicated it would utilize materials developed by the National Center and State Collaborative — for math, these guidance materials were delivered to a small group of LEAs via the SEA’s “Project Success” program, though not distributed to IDOE’s educators in general, and ELA guidance is still under development.</p> <p data-bbox="414 1123 1380 1333">To further support students with disabilities, IDOE described a strong commitment to Response to Intervention (RtI) in its approved ESEA flexibility request, including an emphasis on progress monitoring of students with disabilities in the context of CCR standards; however, during the monitoring event, IDOE indicated progress monitoring supports and tools were still under development and that RtI is “not sufficiently embedded” throughout Indiana.</p> <p data-bbox="414 1365 1380 1470">Additionally, IDOE has not conducted monitoring activities to help ensure the successful implementation of CCR standards for all students beginning in the 2013-2014 school year.</p>

<p>Next Steps</p>	<p>As part of its ESEA flexibility extension request, the SEA must submit amendments to its approved ESEA flexibility request to:</p> <ul style="list-style-type: none"> • Provide technical assistance and supports to educators of students with disabilities for the transition to CCR standards in the 2013-2014 school year and beyond; • Provide technical assistance and supports to educators of ELs for the transition to CCR standards in the 2013-2014 school year and beyond; and • Develop appropriate monitoring supports for the transition of all students to college- and career-ready standards as described above in “Monitoring”. <p><i>Note: While Indiana implemented CCR standards in the 2013-2014 school year, the Indiana legislature, in spring of 2013, approved legislation requiring that “before July 1, 2014, the state board shall adopt Indiana college and career readiness educational standards, voiding the previously adopted set of standards.” As a result, Indiana must amend its ESEA flexibility request to demonstrate how it will meet the requirements to have CCR standards in at least reading/ language arts and mathematics for kindergarten through grade 12 in the 2014-15 school year and beyond consistent with the requirements of ESEA flexibility. ED will send IDOE a separate letter with additional information regarding this amendment.</i></p>
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Element	Develop and Administer High-Quality Assessments
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>.</p> <p>IDOE was approved for ESEA flexibility as a governing member of the Partnership for Assessment of Readiness for College and Careers (PARCC) testing consortium; however, the Indiana General Assembly enacted a state law that requires the utilization, by all LEAs, of the Indiana Statewide Testing for Educational Progress Plus (ISTEP+) assessment, instead of the PARCC assessment, through the 2014-2015 school year.</p> <p>Additionally, the SEA indicated it had not yet developed a plan to transition students from the Indiana Modified Achievement Standards Test to the standardized tests that all non-disabled students will take beginning in the 2014-2015 school year.</p>
<p>Next Steps</p>	

Element	Develop and Administer High-Quality Assessments
	<p>As part of its ESEA flexibility renewal request, IDOE must submit an amendment to its ESEA flexibility request consisting of a high-quality plan to administer a high-quality assessment aligned with CCR standards, in reading/language arts and mathematics by the 2014–2015 school year. The components this plan must include are detailed in a separate letter to Superintendent Ritz.</p>

Element	Priority Schools
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>, which states that SEAs must effect change in priority schools by “ensuring that each LEA with one or more of these schools implements, for three years, meaningful interventions aligned with the turnaround principles.” Three years of concurrent implementation of improvement activities across all turnaround principles are required in non-School Improvement Grant (SIG) priority schools regardless of when they exit priority status. IDOE committed, in its approved ESEA flexibility request, to full implementation in all priority schools beginning in the 2012-2013 school year.</p> <p>The IDOE school improvement planning tools used to select interventions for non-SIG priority schools do not accurately reflect the ESEA flexibility turnaround principles. For example, the second ESEA flexibility turnaround principle requires that interventions are “ensuring that teachers are effective and able to improve instruction by: (1) reviewing the quality of all staff and retaining only those who are determined to be effective and have the ability to be successful in the turnaround effort; (2) preventing the ineffective teachers from transferring to these schools; and (3) providing job-embedded, ongoing professional development informed by the teacher evaluation and supports systems and tied to the teacher and student needs” (italics added). However, a planning template provided by IDOE and currently posted to the SEA website indicates that a school may fulfill this turnaround principle by implementing any one of the three components of this turnaround principle, not all of them, as required. Related training materials for SEA and LEA staff provided by IDOE do not appear to accurately or consistently define the ESEA flexibility turnaround principles.</p> <p>Second, school improvement planning tools and monitoring reports are not sufficiently aligned to facilitate evaluation of concurrent implementation of all ESEA flexibility turnaround principles in non-SIG priority schools. Sample monitoring report findings provided by IDOE are not aligned with</p>

Element	Priority Schools
	<p>implementation goals described in improvement plans and do not evaluate the implementation status of improvement activities across all ESEA flexibility turnaround principles. The SEA did not, provide evidence that each of its non-SIG priority schools reviewed the performance and qualifications of the principal, made a determination regarding whether to keep or replace the principal, and either demonstrated to the SEA that the current principal has a track record of improving achievement and has the ability to lead the turnaround effort or replaced the principal as appropriate. An LEA must review the performance and qualifications of the current principal and make a determination regarding whether it will keep the principal before the school can be considered to be fully implementing interventions aligned with the turnaround principles.</p>
<p>Next Steps</p>	<p>As part of its request for ESEA flexibility extension, IDOE will submit an amendment to begin full implementation in of interventions in non-SIG priority schools in the 2014-15 school year, including a high quality plan to adjust its school improvement planning and monitoring processes by:</p> <ul style="list-style-type: none"> • Accurately describing the ESEA flexibility turnaround principles within related tools, documents, training materials and other supports; and • Aligning planning and monitoring tools to facilitate the determination of whether each school is concurrently implementing all ESEA flexibility turnaround principles for three years.

Element	Focus Schools
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>, which states that SEAs must work to close achievement gaps by “ensuring that each LEA implements interventions...in each of these [focus] schools based on reviews of the specific academic needs of the school and its students.” LEAs are expected to identify those subgroups which led to a focus school’s identification and ensure that the selection and implementation of one or more interventions is based on data and other information on the academic and non-academic needs of those identified student subgroups, including English Learners, students with disabilities and low-achieving students.</p> <p>IDOE has not implemented a school improvement process of sufficient quality to ensure that interventions selected to address reasons for identification of focus schools are implemented. A sample of LEA accountability plans and implementation status reports submitted by IDOE are not adequately aligned with each other. Specifically, implementation status notes do not consistently address the status of those action steps identified in accountability plans as constituting the actual intervention. Additionally, documentation of</p>

Element	Focus Schools
	<p>implementation status does not include feedback regarding adjustments needed to accountability plans (e.g., adjustments to timelines) based on monitoring results.</p> <p>While IDOE committed to full implementation in all focus schools by the first semester of the 2012-2013 school year, per ESEA flexibility requirements, but did not provide evidence confirming implementation meeting the requirements for focus schools according to this timeline.</p>
Next Steps	<p>As part of its ESEA flexibility extension request, IDOE will submit a high-quality plan for adjusting and aligning its SIP and monitoring processes to facilitate the determination of whether its focus schools are implementing those interventions selected based on the performance of its lowest-performing ESEA subgroup(s).</p>

Element	Teacher Evaluation and Support Systems
Summary and Status of Implementation	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>.</p> <p>The SEA's approved ESEA flexibility request committed to a State model of teacher evaluation that weights the overall growth component (sum of individual student growth, student learning objectives and school-wide learning measures), for teachers of tested subjects, between 40-50 percent of the teacher's overall evaluation score. On July 12, 2013, IDOE issued guidance to LEAs that it had revised its State model, due to disruptions in its annual ISTEP+ administration, for teacher evaluation data for the 2012-2013 school year only, allowing LEAs to adjust the weight of the overall growth component to mitigate the impact of test disruptions but still significantly inform the summative evaluation ratings at 25 percent for all teachers. The State model weightings for growth would be returned to levels approved in the SEA's ESEA flexibility request for the 2013-2014 school year data.</p> <p>IDOE has not provided sufficient monitoring and technical assistance, based on the needs of LEAs and schools, to ensure effective implementation of teacher evaluation systems (see "Monitoring" and "Technical Assistance" above for summary).</p>
Next Steps	<p>As part of its ESEA flexibility extension request, IDOE will submit an amendment to its request to:</p>

Element	Teacher Evaluation and Support Systems
	<ul style="list-style-type: none"> • Reduce the weight of student growth in its State model for teacher evaluations for evaluations based on 2012-2013 school year data only; and • Provide monitoring and technical assistance supports around teacher evaluation systems consistent with the “next steps” described above in the “Monitoring” and “Technical Assistance” sections.

Element	Principal Evaluation and Support Systems
<p>Summary and Status of Implementation</p>	<p>The SEA has not demonstrated that this element is carried out consistent with its approved ESEA flexibility request and the principles and timelines outlined in the document titled <i>ESEA Flexibility</i>, which states that SEAs must use the results of new evaluation systems for principals to inform personnel decisions regarding principals, beginning with 2015-2016 school year evaluation data.</p> <p>The SEA’s approved ESEA flexibility request indicates that principal evaluations will mirror the requirements of IDOE’s teacher evaluation systems, which require personnel decisions connected to the results of teacher evaluation systems. IDOE indicated during the monitoring event, however, that the agency does not have authority to require the use of new evaluation system results to inform personnel decisions for principals and that legislative action would be necessary because, per statute, principal staffing decisions are at the discretion of LEAs (legislative action was necessary to connect teacher evaluation systems to personnel decisions).</p> <p>IDOE has not provided sufficient monitoring and technical assistance, based on the needs of LEAs and schools, to ensure effective implementation of principal evaluation systems (see “Monitoring” and “Technical Assistance” above for summary).</p>
<p>Next Steps</p>	<p>As part of its ESEA flexibility extension request, the IDOE will submit an amendment to its request including:</p> <ul style="list-style-type: none"> • A high-quality plan for how it will ensure that its principal evaluation system will be used to inform personnel decisions based on 2015-2016 ratings; and • The provision of monitoring and technical assistance supports around principal evaluation systems consistent with the next steps described in above “Monitoring” and “Technical Assistance” sections.

RECOMMENDATIONS TO STRENGTHEN IMPLEMENTATION

The following recommendations are provided to support the SEA in continuing to meet the principles and timelines of ESEA flexibility and strengthening implementation through continuous improvement and the establishment of systems and processes to sustain implementation and improvement.

- IDOE should provide ongoing clarification to LEAs regarding required timelines for the implementation of CCR standards, English-language proficiency standards and high-quality assessments to support them
- IDOE should continue development of the migrant resource center to provide support to migrant students in their transition to CCR standards
- IDOE should develop and maintain centralized tracking documents for managing the timely and successful implementation of interventions in priority and focus schools
- IDOE should develop and provide guidance to LEAs, schools and teachers that include steps for generating user-friendly reports of student assessment data from the “Learning Connection” platform, to facilitate teacher use of data to drive instruction
- Given the great challenges most SEAs have had in implementing growth measures for students of untested grades and subjects, IDOE should augment guidance materials regarding the development and implementation of SLOs with embedded training, including targeted training for teachers of students with disabilities and English Learners.