

COMPREHENSIVE: YEARS 1 - 3

A. SCHOOL IMPROVEMENT PLAN: DEVELOPMENT, LEA AND SCHOOL IMPROVEMENT PLAN REVIEW

(3 Months after NCLB School Improvement identification)

- 1) Once a school is identified for improvement, a school improvement plan (SIP), per NCLB, must be developed or revised within 3 months.
- 2) The SIP should assess the specific needs of the school. These specific needs shall be determined from an assessment of the following: well-being of students and teachers; mobility; dropout risk; graduation rate (as applicable); attendance rates; suspension rates (disaggregated); expulsion rates (disaggregated).
- 3) The plan should specifically address how the school will meet the needs of students not making AYP for a period of two (2) years.
- 4) The LEA must arrange for a review of the school improvement plan by a peer high-performing school, either within the LEA or in agreement with a neighboring district within 45 days after the plan is completed. The review process should include a team of teachers and administrators from a district or school of similar size and demographics, but with significantly higher academic performance. The LEA will evaluate the quality of the plan and make suggestions for revisions.
- 5) The Local Educational Agency (LEA/district) must develop a formal process for reviewing school improvement plans, which includes consultation with parents, school staff, the local educational agency serving the school, and outside experts not limited to the Indiana Department of Education (IDOE) for approval by the LEA. The LEA must provide assistance to schools in revising the plan or responding to feedback.

(On or before Forty-five days after completion of the plan)

- 6) The LEA must arrange for a review of the school improvement plan by the IDOE. The IDOE will evaluate the quality of the plan and make suggestions for revisions.
- 7) Both the LEA and IDOE must ensure that the NCLB statutory components are included.
- 8) Documentation of meetings, such as sign-in sheets, agendas, notes on the plan, etc. must be kept as evidence in preparation for an IDOE monitoring visit.

Resource Links:

School Improvement Checklist (10 Statutory Components)

http://www.doe.state.in.us/Title/pdf/school_improvement_plan_checklist.pdf

IDOE School Improvement Review Form

Assessment Criteria and Form (resource link forthcoming)

B. NOTIFICATION TO PARENTS

(Following the release of the official School Improvement List)

- 1) The LEA must notify parents of the school's improvement status and their choice to either transfer their child to another school not identified for improvement under No Child Left Behind (NCLB) or participate in Supplemental Educational Services (SES). The letter must be mailed so that evidence of distribution can be presented to IDOE. Students who select the option to transfer must begin the new school year in their "Choice" school. SES should begin early in the school year.
- 2) If more than one school exists as an option for choice, then the LEA must offer at least two options. Schools may not use lack of capacity as a reason to deny Choice.
- 3) An LEA may not be able to offer Choice to students in a school identified for improvement (i.e., if all schools in the grade span are identified for improvement or there is only one school per grade span). If an LEA cannot offer Choice, then the LEA is required to contact a neighboring district to see if they would be willing to accept transfer students. Documentation of this inquiry/conversation must be kept on file (e.g., a signed letter from the other LEA's superintendent declining transfer students).
- 4) The LEA must provide information about Choice and SES options through broader means, including newspapers, posters, and the Internet.

Resource Links:

Differentiated Accountability: Sample Parent Letters (English & Spanish)

<http://www.doe.in.gov/Title/differentiated/sampleletters/index.html>

USDE Non-Regulatory Guidance on Public School Choice

<http://www.ed.gov/policy/elsec/guid/schoolchoiceguid.doc>

USDE Non-Regulatory Guidance on Supplemental Educational Services

<http://www.ed.gov/policy/elsec/guid/suppsvcsguid.doc>

USDE Non-Regulatory Guidance on LEA and School Improvement

<http://www.ed.gov/policy/elsec/guid/schoolimprovementguid.doc>

Giving Parents Options: Strategies for Informing Parents and Implementing Public School Choice and SES Under No Child Left Behind

<http://www.ed.gov/admins/comm/choice/options/index.html>

- 5) The LEA must also send a second mailing with complete SES information, including a list of the names, contact information, and descriptions of all approved providers, to parents. IDOE will send each district their individualized 2011-2012 SES Provider List on or before September 9, 2011.

The letters and information on providers must be approved by IDOE before being sent to parents.

C. WEBSITE INFORMATION ON CHOICE AND SES

- 1) The LEA is required to prominently display the information regarding Choice and SES on its website. Schools that are identified for school improvement for the first year will need to post current year information on Choice and SES, but not post any prior year participation

data. The approved SES Provider list will not be available until early September and districts must have information on their website by the end of September.

Website information on Choice should include:

(As soon as NCLB School Improvement letters are mailed, as applicable)

- **Beginning with data from the 2007-2008 school year**, and for each subsequent school year the LEA has schools in improvement, **the number of students who were eligible for and who participated in Choice.**
- For the current school year, **a list of available schools to which students eligible to participate in Choice may transfer.**
- An LEA should also consider including other information on its Web site that will help parents make informed choices. For instance, an LEA might wish to include the list of schools with students eligible for public school choice. An LEA might also include information on the academic achievement of the schools from which parents may choose, as well as other information on these schools, such as any special programs or facilities, the availability of before- or after-school programs, the professional qualifications of teachers, and parent involvement opportunities. LEAs should also include other information, such as the procedures and timelines that parents must follow in selecting a school for their child, how transportation will be paid for by the LEA or provided by the LEA, and the amount equal to 20% of the LEA's Title I, Part A allocation, which is the amount the LEA must spend for choice-related transportation and SES (referred to as the 20% obligation). An LEA might also include LEA and school contact information for parents to use if they have additional questions or seek more information. Finally, an LEA might also include a link to a downloadable form for parents to use to request to transfer their child to another school.
- The LEA must continue posting historical data on public school choice participation and eligibility, and its current list of transfer options, in subsequent school years accordingly.

Website Information on Supplemental Educational Services should include:

(As soon as NCLB School Improvement letters are mailed, as applicable)

- **Beginning with data from the 2007-2008 school year**, and for each subsequent school year the LEA has schools in improvement, **the number of students who were eligible for and who participated in SES.**
- For the current school year, **a list of available providers (and their descriptions) from which parents may select for SES.** Each district will receive a list of providers from IDOE.
- An LEA should display this information on its (i.e. the LEA's) Web site in a place that is visible and easy for parents to locate. Note that an LEA must list on its Web site all SES providers approved by the State to serve the LEA. This includes SES providers approved by the State that are located within the LEA, as well as in its general geographic location, and providers accessible through distance learning technology [34 C.F.R. §§200.37(b)(5)(ii)(A); 200.39(c)(1)(iii)].

- An LEA must post the information in a timely manner to ensure that parents have current information on their options [34 C.F.R. §200.39(c)(1)]. An LEA must post information on approved providers as early in the school year as possible so that parents can access this information when making decisions about their child's participation in SES, and update this information periodically throughout the school year, as updates become necessary.
- Regarding the number of students who were eligible for and who participated in the *current* school year, an LEA should display this information as soon as it becomes available.
- The LEA must also post data on the number of students who were eligible for and participated in SES during the 2007-2008, 2008-2009, 2009-2010, and 2010-2011 school years, and must post the list of providers for the 2011-2012 school year. An LEA must continue posting historical data on SES participation and eligibility, and its current list of providers, in subsequent school years accordingly.
- An LEA's Web site should include information on which providers are able to serve students with disabilities or LEP students, and other information, such as the LEA's SES timeline and procedures for student enrollment, to help parents make informed decisions about their SES options.
- Additionally, an LEA could include information, obtained from the SEA's Web site, on the LEA's 20% obligation and per-pupil allocation.

D. ADDITIONAL INFORMATION REGARDING SUPPLEMENTAL EDUCATIONAL SERVICES

- 1) LEAs must determine who is eligible to receive SES. Eligible students must qualify for free/reduced lunch and be academically non-proficient. Non-proficiency can be determined by ISTEP+ and LEA or other school assessments (see IDOE's SES Policies Section 14.0).
- 2) LEAs must develop a standard SES Contract using IDOE's sample SES Contract (http://mustang.doe.in.gov/dg/ses/docs/2011-2012_sample_ses_contract.doc) as a framework. Some districts may need to have the SES Contract approved by the school board and/or the district's attorney after IDOE approval has been granted.
- 3) LEAs must also develop a standard SES Agreement form (includes student goals for the SES program) using IDOE's sample SES Agreement (http://mustang.doe.in.gov/dg/ses/docs/sample_ses_agreement_2009-2010.doc) as a framework.
- 4) LEAs must offer multiple enrollment periods throughout the school year (separated by different periods during the school year). At a minimum, LEAs must offer at least two enrollment periods of sufficient length (i.e., at least 14 business days) for SES at different periods during the school year.
- 5) SES providers must be allowed to provide tutoring onsite, at the school. In addition, transportation, in accordance to the guidelines described below, must be provided to students participating in SES. Transportation should also be provided if tutoring is offered during the summer months.

Minimum transportation guidelines for SES offered on-site at a school:

- Transportation will be provided from school to the student's home OR district designated drop-off location.
- Transportation will be provided by district bus/van to the student's home or the district-designated drop-off location or the district will reimburse parents for mileage for transportation from school to home.

Minimum transportation guidelines for SES offered off-site:

- Transportation will be provided by district bus/van or the district will reimburse parents for mileage to transport students either from school or the student's home to the provider's approved tutoring location (within district boundaries).
- Transportation will only be provided to tutoring locations within district boundaries.
- Transportation from the provider to student homes will be the parent's responsibility.

Resource Links:

[School Space Use Guidance](#)
[2011-2012 IDOE's SES Policies \(To be released online later this fall\)](#)

E. MANDATORY SET-ASIDES

20% Choice Transportation and Supplemental Educational Services (SES)

- 1) The LEA must set aside 20% of its new Title I, Part A allocation to provide Choice transportation and SES.
- 2) 1% of the 20% can be used for parent notification and outreach expenditures regarding Choice and SES.
- 3) Unless an LEA meets the criteria below (Good Faith Effort), if an LEA does not meet its 20% obligation in a given school year, then it must spend the unexpended amount in the subsequent school year on choice-related transportation, SES, or parent outreach and assistance (up to 1%). This amount would be in addition to the 20% obligation in the new school year.
 - Partner, to the extent practicable, with outside groups, such as faith-based organizations, other community-based organizations, and business groups, to help inform eligible students and their families of the opportunities to transfer or to receive SES. (See L-4 through L-6 in USDE's SES Non-Regulatory Guidance.)
 - Ensure that eligible students and their parents have a genuine opportunity to sign up to transfer or to obtain SES, including by: (a) providing timely, accurate notice to parents (see L-7 in USDE's SES Non-Regulatory Guidance); (b) ensuring that sign-up forms for SES are distributed directly to all eligible students and their parents and are made widely available and accessible through broad means of dissemination, such as the Internet, other media, and communications through public agencies serving eligible students

and their families (see G-7 and G-8 in USDE's SES Non-Regulatory Guidance); and (c) providing a minimum of two enrollment windows, at separate points in the school year, that are of sufficient length to enable parents of eligible students to make informed decisions about requesting SES and selecting a provider. (See L-8 through L-10 in USDE's SES Non-Regulatory Guidance.)

- Ensure that eligible SES providers are given access to school facilities, using a fair, open, and objective process, on the same basis and terms as are available to other groups that seek access to school facilities. (See L-11 through L-14 in USDE's SES Non-Regulatory Guidance.)
 - If the LEA would like to spend the remainder of its 20% obligation on other allowable activities (i.e., submit an amendment to the Title I grant), the LEA must: 1) maintain records that demonstrate it has met the criteria above and 2) submit an IDOE Good Faith Verification form and supporting evidence to IDOE before it requests to spend the remainder of its 20% obligation on other allowable activities to IDOE.
- 4) If other funds are used (instead of Title I), a letter must accompany the Title I grant application. The letter must state the LEA's 20% obligation (dollar amount) and what other federal, state, or local funds will be used.
 - 5) The LEA must monitor expenditures for Choice and SES, including tracking funds from a non-Title I source (if other funds are used for Choice related transportation or SES).
 - 6) Unless a lesser amount is needed for Choice and to satisfy all requests for SES, the district must spend 5% for Choice, 5% for SES and 10% for either, as the LEA determines.
 - 7) The LEA must monitor student enrollment in SES and track Choice and SES expenditures on a regular basis to ensure that the LEA does not exceed its Choice and SES funds.
 - 8) Verification on final expenditures for Choice transportation and SES will be done via desktop and/or onsite monitoring, as well as through required expenditure reporting.

Resource Links:

[2011-2012 Choice & SES Set-Asides \(To be released online later this fall\)](#)

[2011-2012 Choice & SES PPEs \(To be released online later this fall\)](#)

[2011-2012 Good Faith Verification Form \(To be released online later this fall\)](#)

10% School Improvement Professional Development

- 1) The school identified for improvement must set aside 10% of its allocation to provide high quality, focused professional development aligned to supports required under the Differentiated Accountability Model. The Title I grant application should clearly reflect a plan that addresses the school's need, specifically the subgroup(s) and content area(s) for which the school did not make AYP. The 10% set-aside for school improvement professional

development must be expended by the end of the fiscal year. Any amount not expended must be carried over into the same line item in the next year.

Resource Link:

Title I Application, Quarterly Monitoring Reports and Expenditure Reports (School Improvement Grant Application)

<http://www.doe.in.gov/TitleI/reporting.html>

F. SCHOOL IMPROVEMENT GRANT

- Additional funds are available to schools identified for comprehensive improvement. These funds must be used to support school improvement requirements, such as Choice or SES transportation, assessments, professional development training, and additional staff (i.e., an instructional coach). Funds should be available in September.

Resource Links:

Title I Application, Quarterly Monitoring Reports and Expenditure Reports (School Improvement Grant Application)

<http://www.doe.in.gov/TitleI/reporting.html>

Differentiated Accountability: Frequently Asked Questions

To be released later this fall

G. WIRELESS GENERATION AND ACUITY

- 1) The school identified for improvement must participate in school-wide use of reading and mathematics diagnostic tools, Wireless Generation and Acuity.
- 2) The Instructional Coach will be required to participate in all IDOE-sponsored training.

Resource Link:

Differentiated Accountability: Frequently Asked Questions

To be released later this fall

H. INSTRUCTIONAL COACH

- 1) A full-time instructional coach must be hired to support teachers in the specific subject area that is not making AYP. The coach will be required to participate in IDOE training.

Resource Link:

Differentiated Accountability: Instructional Coach Job Description

http://www.doe.in.gov/TitleI/pdf/differentiated_accountability_instructional_coach.pdf

COMPREHENSIVE: YEAR 3

Corrective action to take at least one of the following:

- replace staff responsible for continued failure to make AYP
- replace principal or appoint outside mentor (.5 FTE minimum)
- hire ELL specialist (.5 FTE minimum) to coach classroom teachers & ensure appropriate interventions are provided
- extend school day or school year.

The corrective action plan must be submitted to IDOE and reviewed by a multidisciplinary panel.

COMPREHENSIVE: YEAR 4

A. ALL CONTENTS FROM “COMPREHENSIVE: YEAR 1 – 3”

A. CORRECTIVE ACTION

- As appropriate, the LEA must sustain the corrective action.

B. RESTRUCTURING

- All K-3 teachers and principals must participate in the Indiana Reading Academy training provided by IDOE (based on Reading First Strategies)
- An LEA must begin planning to carry out one of the following restructuring options for the following school year:
 - replace principal if leader has remained the same during sustained failure to make AYP and replace all staff responsible for the failure to make AYP
 - close the school
 - reopen school as a charter school
 - contract with private management company with demonstrated effectiveness to run school.

Note: "Other" category of restructuring is eliminated.

Resource Links:

Planning for School Restructuring Presentation

http://www.doe.in.gov/Title/pdf/planning_school_restructuring.ppt

Restructuring Plan Template

http://www.doe.in.gov/Title/pdf/restructuring_plan_template.doc

COMPREHENSIVE: YEARS 5 and BEYOND

B. ALL CONTENTS FROM “COMPREHENSIVE: YEAR 1 – 4”

C. CORRECTIVE ACTION

- As appropriate, the LEA must sustain the corrective action.

D. RESTRUCTURING

- An LEA must implement one of the following restructuring options no later than the first day of school following Year 4.
 1. Replace the principal, if the leader has remained the same during sustained failure to make AYP AND replace all staff responsible for the failure to make AYP;
 2. Close the school;
 3. Re-open the school as a charter school; or
 4. Contract with a private management company with demonstrated effectiveness to run the school.

Resource Links:

Planning for School Restructuring Presentation

http://www.doe.in.gov/Title/pdf/planning_school_restructuring.ppt

Restructuring Plan Template

http://www.doe.in.gov/Title/pdf/restructuring_plan_template.doc

COMPREHENSIVE: YEARS 8 AND BEYOND

- ❑ The superintendent must resubmit and publicly defend the school's restructuring plan before an IDOE panel. The plan must include analysis of previous restructuring actions and outcomes and delineate more substantive actions for improving student achievement.

COMPREHENSIVE-INTENSIVE

- ❑ Comprehensive-intensive schools will be required to implement all required actions pertaining to their year of improvement. In addition, the state will provide support to the school through either a school support team or participation in the Indiana Institute for School Leadership teams.
- ❑ Comprehensive-intensive schools are the top 20 schools identified as Comprehensive and scoring farthest away from AYP targets.

COMPREHENSIVE-SUPPORT

- ❑ An additional category of Comprehensive-support schools has been identified. These are schools that had a Comprehensive status in 2010-2011 but made measurable progress 2011. This group will remain in the Comprehensive category to receive support provided for the schools in this status.
- ❑ Comprehensive support schools will not have to implement a corrective action or restructuring.