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MEMORANDUM

DATE: December 7, 2011
TO: TechMIS Subscribers
FROM: Charles Blaschke and Blair Curry
SUBJ: SEA Waiver Request Highlights

On November 29, we sent subscribers our preliminary analysis of five SEA waiver requests submitted to USED in the middle of November. Enclosed in this TechMIS Special Report are the remaining six states of the 11 states that have submitted SEA waiver requests thus far. Between 20 and 30 states are expected to submit their waiver requests during the second round in mid-February. The peer review process began last week and is expected to make recommendations for negotiations between USED and individual SEAs over the next several weeks, after which time the Secretary of Education will decide which SEA requests will be approved and any conditions that will be imposed (e.g., passage of state legislation early next year where necessary). When each approved SEA is posted, we will provide updates.

The reader is cautioned that some of the waiver requests made thus far go beyond the Secretary's authority or otherwise do not follow the "Flexibility" guidance published in October. It is also very important to note that on November 10th (4 days before the submission date), an addendum to the October "Flexibility" waiver guidance was published by USED which is likely responsible for some of the confusion which we noted in certain states description of the process for selecting Priority and Focus Schools and dates of implementation. Our analysis of the addendum will be included in our next TechMIS issue next week.

Enclosed are the preliminary analyses of waiver requests from Georgia, Indiana, Massachusetts, New Jersey, New Mexico, and Oklahoma. Please call if you have any questions.

Special Report: State Waiver Request Updates

A Technology Monitoring and Information Service (TechMIS)
SPECIAL REPORT

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Georgia

The Georgia application follows USED waiver Flexibility guidelines very carefully in terms of selection of Priority Schools which will be the State's Title I and Title I-eligible schools which fall into the category of the lowest 5% based on: (a) state assessments; or (b) high schools with graduation rates less than 60 percent over several years. The School Improvement Division of the Georgia Department of Education (GaDOE) will assign a specialist to work with each Priority School to coordinate funds/services under SIG and Race to the Top for that school. A non-negotiable "set of actions and interventions" will be included in the Memorandum of Agreement. Those between GaDOE and the Priority School to implement the seven turnaround principles. Those of particular interest are:

- hiring coaches to engage teachers in job-embedded professional learning;
- providing additional learning time for students and for teacher collaboration;
- participating in a State-led Georgia Assessment of Performance on School Standards (GAPSS analysis); and
- implementing a plan for student, family and community engagement.

Under "use of time" to ensure opportunities to learn and collaborate, a data analysis using School Keys will be conducted to determine which processes need to be changed, eliminated, or expanded. A School Improvement Specialist working with the Regional Education Service Agencies (RESAs) with responsibility for Priority Schools/districts will select/influence research-based action strategies and interventions for incorporation into school improvement plans and provide support for implementation. SES and choice set-asides (20%) would be waived (with freed-up funds used for the Flexible Learning Program (FLP) 5% set-aside), but the current 10% set-aside for professional development will remain. Georgia is also requesting that SES/choice requirements be waived because data indicate that (1) less than 5% of eligible students take advantage of the choice option; and (2) results from SES analyses show that students receiving SES have not outperformed matched controls on State tests of achievement in any area for the duration of the program.

In lieu of SES, GaDOE is proposing a Flexible Learning Program that allows LEAs flexibility in

designing programming tailored to the needs of their school and with the capacity to serve more students in need of similar support. The FLP would be initially funded through the minimum 5% Title I set-aside for the same schools currently mandated to implement SES. By 2013-14, all Priority and Focus Schools will be included.

High priority will be placed on the State-led GAPSS analysis which will drive the selection of interventions and other subsequent initiatives. Summer Leadership Academies will be held for Priority School staff, among other things, to select research-based strategies, actions, and interventions that will be incorporated into the school improvement plan. The Memorandum of Agreement will also include requirements for collaborative planning time being provided during the school day for teachers.

The anticipated timeline for implementation includes:

- January-June 2012 -- professional learning for School Improvement Specialists
- September 2012 -- release of reports for all Georgia schools, including plans for interventions which will be “driven by areas of need...with a focus on the subgroup data.”
- July 2013 -- identification of Priority and Focus Schools with implementation to begin during the 2013-14 school year.

The Focus School is “a school, that based upon the most recent data available, is contributing to the achievement gap in Georgia.” The number of Focus Schools will be equal to the lowest achieving 10% of all schools in the State. A Memorandum of Agreement between districts and the State will have non-negotiable actions and interventions required of each Focus School, similar to the Priority Schools, with an emphasis on providing additional learning time for students and additional time for professional development and teacher collaboration, with a particular emphasis on collaboration between regular education teachers and special education teachers/English language learner specialists. Like Priority Schools, Focus Schools will be required to offer Flexible Learning Programs under the assumption that five percent of Title I funds must be so allocated.

In addition to GaDOE specialists which will be provided in the areas of English language learners, students with disabilities, and at-risk students, “the GaDOE will broker services from other support agencies (e.g., Regional Educational Service Agencies (RESAs), Georgia Learning Resource Services (GLRS), etc.) to meet the specific needs of the focus schools.”

The additional learning time provided by Focus Schools must be in core academic areas (e.g., science, social studies, and writing), enrichment activities, or teacher collaborative and professional development time. The primary goal of Focus Schools is to “promote achievement based on underperforming subgroups and high needs students.” All Focus Schools will receive newly-developed tools and resources from the State. Districts are expected to provide additional resources to Focus Schools.

The projected timeline for Focus Schools includes:

- January-June 2012 -- professional learning for School Improvement Specialists, followed by release of reports on all Georgia schools

- final identification of Priority and Focus Schools will occur in July 2013, with full implementation in the 2013-14 school year.
- Focus Schools that exit the lowest 10% will continue to receive RESA services for two additional years.

Georgia is dedicated to a RTI process to identify students in need of small group or individualized supplemental instruction. Key components of the State's RTI process include a 4-Tier delivery model providing support aligned to student need through the implementation of standards-based classrooms, evidence-based instruction, evidence-based interventions with increasing levels of intensity based on progress monitoring and the use of ongoing assessment data to determine academic and behavioral needs. Each school will have a Data Team to serve as the "driving force for instructional decision making in the building."

To implement the plan some components will likely require some state legislature action.

Indiana

The Indiana waiver request reflects the philosophy of State Superintendent Tony Bennett which has three tenets -- competition, freedom to choose, and accountability. His vision of an accountability framework uses "easy-to-understand (A-F) categories for school performance, includes measures of both pass/fail and growth, and puts a strong focus on closing the achievement gap by targeting growth for the lowest 25 percent of students."

Priority Schools would be those that receive an "F" or are otherwise persistently low-achieving schools, defined as a school receives a "D" or an "F" for two or more consecutive years. Approximately 16 percent (154) of Title I schools would be identified as Priority Schools. The Indiana growth model will be used to monitor progress toward the State Superintendent's goal that 90 percent of students pass math and English language arts state assessment, 25 percent of high school graduates pass AP or IB exams or earn college credit in high school, and 90 percent of students graduate with a meaningful diploma.

State law calls for a six-year plan under which interventions are implemented for identified schools; the goal of the waiver initiative is to accelerate this to a four-year process beginning in 2012-13. Both Priority and Focus Schools have to submit annual intervention plans which include progress reports that are reviewed to determine changes in interventions.

The selection of interventions is grounded in the Mass Insight Readiness Framework; Indiana is one of several states using the Mass Insight model. The State Board of Education appoints a Turnaround School Operator (TSO) that runs all or part of the school. Only the lowest-performing schools are assigned TSOs, while other low-performing schools are assigned Lead Partners following the Mass Insight model. Each TSO signs a one-year contract with the State which includes performance targets the TSO must meet to remain in good standing. Lead Partners engage stakeholders to establish buy-in and are often embedded into the schools. The State Superintendent is hoping to accelerate the turnaround deadlines and will ask the legislature to take up the issue during the next legislative session which begins in January 2012. The goal is

to commence implementation during the 2012-13 school year, far ahead of the 2014-15 required timeline.

The Mass Insight Readiness model includes three types of interventions -- readiness to learn, readiness to teach, and readiness to act. Interventions are tied to “rigor tiers” with Tier I designed for all students or staff; Tier II targeted on a core curriculum, data-driven instruction, and community partnerships; and Tier III highly targeted to meet individual or subgroup needs including ELL, exceptional learners and other at-risk populations.

In Year 1, Focus Schools must select at least three interventions, one from each of the three readiness domains. In Year 2, Focus Schools must make necessary modifications to the interventions or the “fidelity of implementation.” In Year 3, Focus Schools must make further modifications, if necessary, increasing the rigor tier or fidelity of implementation and report to the State on progress being made. In Year 4, Focus Schools must implement interventions with rigor as stipulated by the Indiana Department of Education and, if LEAs do not comply, school improvement funding will cease. The same year-to-year iterative process is to be used for Priority Schools.

Massachusetts

The State proposes to integrate the current State system for identifying and intervening in lowest-performing schools and districts into the waiver initiative. Approximately 40 Level 4 (i.e., “level” is an SEA designation) and Level 5 schools will be designated as Priority Schools; however, the Commissioner has discretion in final selection. In their District Improvement Plans for Priority Schools, districts must describe the “theory of action” of the selected school-level interventions and detail how the district will select external providers and the district will monitor implementation to determine if interventions are working. Examples of meaningful interventions include:

- the use of individualized professional learning plans for principals and teacher leaders;
- building on procedures and competencies used by groups such as Teach for America, New Teacher Project, and the Boston Teacher Residency Program;
- redesign of the school day to facilitate implementation of school-based Learning Communities for teachers;
- use of tiered intervention supports, especially for ELLs and students with disabilities;
- use of English learner coaches to provide “on demand” coaching;
- use of Universal Design for Learning Principles as part of tiered systems of support (RTI); and
- use of the State’s *Galileo* Instructional Data System to help teachers use assessment data to inform instruction.

For districts with Priority Schools, “meaningful interventions” have to be implemented no later than the 2014-15 school year.

The number of Focus Schools will be the 10% of the State’s Title I schools with persistently low subgroup achievement levels and graduation rates. The selection process will initially focus on

high schools that have had graduation rates below 60 percent over the last four years. Focus Schools will be the State's Level 3 schools.

Within 90 days of having a school designated as a Level 3/Focus School, the district will have to submit a plan which will include an intervention that meets the SEA's "interpretation of the needs assessment or other information, such as findings from a review of the district and its schools" by the State's accountability office. Implementation will begin immediately after planning is completed, preferably in the school year in which the school was identified as a Focus School, but no later than the start of the following year. A district with one or more Level 3/Focus Schools will be required to reserve up to 25 percent of its Title I funds to support implementation which will be set aside at the district level. As the application notes, "This will enable the district to address needs in multiple Title I schools or to use Title I funding for district-wide support (e.g., instructional coaches or school networking activities). We anticipate that by giving districts some degree of flexibility in how to use these resources, they will be able to maximize the benefit based on the unique needs of their Level 3/Focus Schools." Districts will be able to amend their Title I grant application to reallocate unspent funds for interventions on a case-by-case basis. The SEA may require a district to carry over unspent funds for an intervention in a given year to fund the intervention in the following year.

The SEA waiver application requires a detailed approach to be used by districts to implement a tiered system of support for an entire Focus School, or "across a network of Title I schools to meet the academic and non-academic needs of all students, including students with disabilities, English language learners, and students who are academically advanced."

Extended learning time through redesigns of school days or years -- after-school, before-school, weekends, summers -- would be very focused on individuals or subsets of students at all levels. Another priority being emphasized is Coordinated Early Childhood Education programs which can "employ an intergenerational component to help parents develop a home environment that supports their children's learning needs, provides opportunities to monitor the progress of their child and communicate with school personnel, and provides assistance to parents to tutor their children at home to reinforce work done in school."

External partners will be selected through the use of a rigorous review and approval process and could include technical assistance organizations, community-based organizations, or "Commendation" schools. The "Conditions for School Effectiveness Research Guide," developed by the Regional Education Laboratory -- Northeast and the Islands, will be made available for use in selecting external partners where appropriate and research-based interventions with evidence of effectiveness. Examples of interventions which are "encouraged" include the Massachusetts Tiered System of Support (MTSS) through use of instruments such as DIBELS, GRADE, and the SEA Expanded Learning Time Initiative (ELT) which is in the sixth year of implementation in 19 schools. The SEA has a database, developed through its review of district programs, of interventions used with English language learners (and former ELLs) and other at-risk students which will likely also be encouraged for use. It will also make available the SEA's "Guidance and Promising Practices and Exploring Best Practices in Redesign" documents.

In addition to quantitative and qualitative tools to support leadership, meaningful interventions identified in the waiver request include school-based learning communities for peer-led support and accountability; a tiered instruction system of support focused on system-level change in classrooms, across a Level 4 school, or across a network of Title I schools to meet academic and non-academic needs for all; adequate learning time (by redesigning school day); school-based services dedicated to students' social emotional and health needs; family-school partnerships; analysis of strategic uses of resources and budget; aligned curriculum supported in professional learning communities through a six-stage process; effective instruction within the tiered system of support particularly for ELL; and a balanced system of formative and benchmark assessments guided by Universal Design for Learning (UDL), valid research, MCAS result analysis and input from professional staff.

In feedback gathered to prepare the State's waiver, educators voiced strong support for flexibility from public school choice and supplemental education services (SES) requirements. Massachusetts will no longer mandate NCLB school choice and supplemental educational services (SES) as currently required under NCLB. Supports and interventions will instead include: expanded learning opportunities for struggling students, which may include tutoring and other supports offered through strategic partnerships; professional development that is embedded, sustained, and connected to educators' needs; and other supports aligned to ESE's 11 Conditions for School Effectiveness, including those that address students' social-emotional needs and family—school engagement. Specific focus will be placed on the particular needs of students with disabilities and English language learners (and former ELLs). Districts will be required to reserve up to 25 percent of their Title I, Part A funds to address identified needs.

New Jersey

The 5% lowest-performing Priority Schools include three subcategories:

- Title I schools with the lowest absolute proficiency levels;
- High schools among the lowest performing ones that also have low schoolwide graduation rates; and
- Previously identified Tier I or Tier II schools under the SIG initiative.

The preliminary count of Priority Schools is 72 Title I schools and two non-Title I schools.

Primary responsibility for identifying interventions will be turnaround experts located in seven Regional Area Centers. Priority School interventions will include CCSS-aligned curriculum and assessments, professional development to improve instruction, data systems, guidelines for identifying and using extended learning opportunities, and innovative strategies to support low-performing students. The turnaround experts in the RACs can also select resources, materials, or programs they feel will best meet the needs of students in specific Priority Schools under their direction. All turnaround experts will be trained for operations beginning in the Spring of 2012. The types of interventions selected will generally be aligned with SIG model intervention components, including school climate and family and community engagement. The RACs will be responsible for helping each Priority School develop an Individualized School Improvement Plan. If districts refuse to implement their Priority School plan, the NJDOE will be able to withhold Title I monies until the district comes into compliance. In non-Title I districts, the State

will use State regulatory policies to do the same. Some of the unique conditions/characteristics of interventions include:

- In each Priority School funded with Title I funds, a full-time climate and cultural specialist will be assigned.
- NJDOE model curriculum unit assessments and quality interventions will be used for all students two or more grade levels behind in reading and math.
- Interventions must be supported by 100% of a Priority School staff.

Regarding use of time, “this intervention may include extended learning time during the day..... it may also include extended learning opportunities in the form of either before school or afterschool programs consistent with CCSS. The NJDOE may partner with organizations, either for-profit or not-for-profit, and school-based entities to identify best practices and strategies for effective extended learning opportunities.” Schools may provide these services directly or contract with appropriate providers.

It appears that a high priority is being placed on increasing effective family and community engagement in Priority Schools, especially through extensive professional development for families and community engagement staff. Measures will include those on a school climate survey.

Beginning in the Fall of 2013, all Priority Schools will receive “targeted interventions,” as determined by the RACs and as agreed to by the LEA, for a two-year period which will provide schools “the time needed to implement required changes and demonstrate improvement in student achievement.” That period may be extended to three years if the NJDOE determines, in its sole discretion, that a Priority School is making substantial progress. Priority Schools that fail to implement the required interventions or fail to demonstrate required improvement in student academic achievement may become subject to state-ordered closure or other action.

During the Winter/Spring of 2013, the RACs will determine appropriate interventions and levels of interventions required for each Focus School, which have to develop school improvement plans for implementation during the 2013-14 school year.

Priority and Focus Schools fall into two categories -- those that have had an extensive review in the last 24 months, considered “quality-reviewed schools,” and those which are not considered “non-quality reviewed schools.” For quality-reviewed schools, identified interventions “will be implemented by the districts beginning in September 2012.” For non-quality reviewed schools, reviews will take three to six weeks to complete and, at the end, a list of targeted interventions will be completed. Planned execution of targeted interventions for non-quality reviewed Priority Schools should begin in the Fall 2012. For non-quality reviewed Focus Schools, implementation must occur no later than the Fall of 2013.

The process for identifying Focus Schools which totals 144 thus far, has resulted in 125 Title I schools and 19 non-Title I schools.

There appear to be some unique assets of the State’s waiver application. As noted in the Wall Street Journal (November 17th), “It’s the state’s strongest proposal yet to tie student performance

to funding.” The state’s largest education association said it “supported much of what was in the waiver.” According to the Journal, “If approved, the waiver would free up funding that is currently used for tutoring programs in failing districts to be used for other fixes. For example, money could be used for extra instruction on Saturdays or after-hours,” State Education Department spokesman Justin Barra said. He also noted that, the state “already has the authority to make changes included in the waiver application, but that power hasn’t been used.”

The only description of SES in the application was a description of how it currently exists under NCLB. The Department received many comments from parents and LEA staff on the elimination of the 20 percent set-aside for SES and choice-related transportation. Comments included the idea that perhaps providers should be more strictly approved and evaluated and that the public does not want students to lose access to these tutoring services. It is unclear as to what the State is proposing with regards to SES at this time.

Though it was not addressed in the draft outline, the NJDOE provided additional guidance in the waiver application on the use of Title I funds to make clear that under the new accountability system, RACs would work with LEAs to spend funds in a number of possible ways to extend learning time, as deemed necessary. These options could include, among others, tutoring, Saturday school, or extending the length of the school day. The RACs may identify any of the following interventions in any Priority School that fails to utilize instructional time and time for teacher collaboration to prepare all students including English Learners, students with disabilities and low-achieving students to be college- and career-ready. Intervention may include extended learning time during the school day or it may also include extended learning opportunities in the form of either before school or afterschool programs consistent with CCSS. The NJDOE may partner with organizations, either for-profit or not-for-profit, and school-based entities to identify best practices and strategies for effective extended learning opportunities. To the extent the RACs identify before school or afterschool is not mentioned.

New Jersey is proposing some legislative/regulatory changes regarding teacher evaluations and professional development. Rather than the current focus on clock hours and seat-time, the goal would be to drive outputs that encourage innovation with approaches to improving academic achievement via PD, such as devoting increased time to expanding Professional Learning Communities (PLCs). PLCs are referenced in several other places in the waiver application as a means to support teachers.

New Mexico

New Mexico will be using an “A to F” grading system (similar to Florida) which is based on three general factors: current performance, achievement growth, and other factors that contribute “meaningfully” to overall goals. School growth considers performance of both the school and individual students. Currently about 770 schools are designated as in need of improvement. Priority Schools will be those with “F/F,” “F/D,” or “D/F” ratings for two consecutive years and which are part of the lowest five percent of all Title I schools.

Priority Schools have to implement all seven State-defined Turnaround Principles, while Focus

Schools have to implement four of the seven. The Priority School Bureau within the State's Public Education Department (PED) will align existing tools and State law to each of the seven Turnaround Principles for both Priority and Focus Schools. "Fidelity implementation" of interventions, including RTI, is emphasized heavily in a manner similar to other states such as Minnesota. As the application states, "To ensure that interventions being used in Priority Schools are effective, PED will place a command focus on the fidelity of implementation. As schools implement tools such as formative assessments, instructional coaching, or response to intervention, the state expects to see data that reinforces the school's selection of such tools, as well as data to support their continued use. If over time student achievement is not increasing, the expectation is that schools, with the support of their district and the state, will shift funding to tools that do yield a return on investment." New Mexico's waiver request also emphasizes that the PED will also ensure that specific interventions selected by Priority Schools are aligned to the needs of the students. As an example, if Hispanic students are struggling more than other groups, the school will be required to implement an intervention program that addresses the unique needs of that student group. Continuous evaluation will occur and, through an iterative process, additional interventions will be used until student progress is achieved.

The document identifies, in Attachments 18 and 19, specific tools and professional development activities which are aligned to each of the Turnaround Principles. The SEA/PED will partner with districts with both Priority and Focus Schools to align and select interventions and prepare individual school budgets.

Funding for interventions in both Priority and Focus Schools will come primarily from the 20% set-aside for SES which will be freed up as well, to the extent guidance allows, School Improvement Grant funding and other allowable Federal funding sources, including general Title I Part A funds.

Extended learning time -- longer school days or years -- is referred to as one of several strategies principals can implement, particularly principals in School Improvement Grant sites.

Oklahoma

The State will identify 60 Title I schools as Priority Schools, along with similar non-Title I schools comparable to the Title I schools. All Tier I schools receiving SIG funds will be identified as Priority Schools, as well as any school with a grade "F" defined by State law. As part of the waiver request, the State will be using a grade "A-F" system along with the differentiated accountability and support system already in State law. Individual school grades, both Title I and non-Title I, will be based 33 percent on student test scores, 17 percent on student learning gains, 17 percent on improvement of the lowest 25 percentile of students, and 33 percent on whole school improvement. The criteria will include such factors as attendance, graduation rates, parent involvement, school culture, etc. Districts must demonstrate the capacity to implement turnaround principles beginning in the 2012-13 school year for at least two years for each Priority School. If not, control is relinquished to the SEA. Funds for Priority Schools would include all Federal formula and competitive grants, including SIG funds. The SEA can reserve up to 20 percent of a district's Title I allocation to allow the SEA to begin or continue

implementing turnaround principles in Priority Schools. Priority Schools can be designated as schoolwide programs.

To implement turnaround principles in Priority Schools, the State Board of Education may choose to contract with an education management organization (EMO). All Priority Schools are encouraged to implement positive behavioral interventions and support (PBIS) models, along with response-to-intervention (RTI) models to help achieve environments conducive to safety, discipline, and instructional improvement. Family and community engagement components operated by an EMO or "appointed leadership" will be audited using tools such as the Family Engagement Tool provided by the Center for Innovation and Improvement. All Priority Schools will be required to use the *Ways to Improve School Effectiveness* (WISE) online planning tool developed by the State. A modified version will be used in planning reforms in alternative schools or Focus Schools discussed later.

Priority Schools can amend existing 21st Century Community Learning Center grants and, if approved by the State, can use 21st CCLC funds for the following:

- school community partnerships, including alignment between schools and community-based faith-based organizations;
- expanded learning activities;
- engaged learning, including hands-on student-centered learning and meaningful experiences in science, math, physical activity, music, arts, and other subjects; activities must compliment, not replicate the traditional school day and provide opportunities for mentoring and tutoring, apprenticeships and college and career exploration, and family engagement focusing on the most at-risk students;
- professional development in both content areas and youth development to form "healthy" relationships between the staff and students;
- "intentional programming," among other things, to develop specific sets of social skills, and align instruction with school activities to help students catch up with their classmates.

Extended learning opportunities will not only target Priority and Focus Schools, but other schools in the lowest 25 percent performing schools in the State. These schools, referred to as Targeted Intervention Schools, must implement interventions and strategies consistent with the research-based Menu of Interventions and Supports for School Improvement which includes:

- public school choice and supplemental educational services;
- job-embedded professional development;
- extended school day, week, or year;
- instructional and graduation coaches;
- partnerships with businesses and industry; and
- high-quality alternatives to suspension;

Both RTI and PBIS were singled out. Districts with Priority and Focus Schools are encouraged to use RTI models currently being developed under a State Personal Development grant (IDEA funds) delivered as a blended model. Oklahoma has adopted the Digital Learning Council model and includes distance learning in its "roadmap for reform" which supports, not only well-implemented RTI approaches for at-risk students, particularly English language learners and

students with disabilities, but also teacher professional development and collaboration as part of the professional learning communities components.

Focus Schools are identified based on the achievement of subgroups and closing gaps between subgroups. As the request notes, “Because Focus Schools will have vastly different intervention needs based on the subgroups that are underperforming or graduating at lower rates, it is imperative that Focus School interventions be designed to target the specific needs of the school, its educators, and its students.” Not only will every Focus School be required to use WISE, but all staff in a Focus School must participate in State-provided training in the use of the Oklahoma Data Review Model. Each district with at least one Focus School will be required to set aside a percentage, not to exceed 20 percent of its Title I allocation, to implement rigorous interventions, including tutoring, and to provide school choice options for parents. The actual percentage will take into account the number of Priority and Focus Schools in a district, the progress they have made, and other subgroup gap measures. At least five percent must be provided for parent choice. The remainder of the Title I set-aside in Priority and Focus Schools must be spent on the Menu of Interventions and Supports for School Improvement (in Attachment 12 of the State's waiver request).

Some of the key timelines for Priority and Focus Schools include:

- determination of funding amounts for Priority and Focus Schools -- before June 1, 2012;
- contract with an EMO or appoint a C3S (State-controlled schools) leadership group -- no later than March 1, 2012;
- begin implementation of turnaround principles in all Priority Schools -- August 1, 2012.