



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

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Attachment 2
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Honorable Tom Torlakson
Superintendent of Public Instruction
California Department of Education
721 Capitol Mall
Sacramento, California 95814

Dear Superintendent Torlakson:

During the week of March 7 - March 11, 2011, a team from the U.S. Department of Education's (ED) Student Achievement and School Accountability Programs (SASA) office reviewed the California Department of Education's (CDE) administration of Title I, Section 1003(g) (School Improvement Grants (SIG)) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended. As part of its review, the ED team interviewed staff at the State educational agency (SEA) and two local educational agencies (LEAs). The ED team also conducted site visits to two schools implementing the SIG intervention models, where they visited classes and interviewed school leadership, teachers, parents, and students. Enclosed you will find ED's final monitoring report based upon this review.

In February 2011, SASA began its first year of monitoring of the SIG program. The primary purpose of monitoring is to ensure that the SEA carries out the SIG program consistent with the final requirements. Additionally, ED is using its monitoring review to observe how LEAs and schools are implementing the selected intervention models and identify areas where technical assistance may be needed to support effective program implementation.

In line with these aims, the enclosed monitoring report is organized in three sections: (1) *Summary and Observation*, (2) *Technical Assistance Recommendations*, and (3) *Monitoring Findings*. The *Summary and Observations* section describes the SIG implementation occurring in the schools and districts visited, initial indicators of success, and any outstanding challenges relating to implementation. The *Technical Assistance Recommendations* section contains strategies and resources for addressing technical assistance needs identified during ED's visit. Finally, the *Monitoring Findings* section identifies any compliance issues within the six indicator areas reviewed and corrective actions that the SEA is required to take.

The CDE has 30 business days from receipt of this report to respond to all of the compliance issues contained herein. ED staff will review your response for sufficiency and will determine which areas are acceptable and which require further documentation of implementation. ED will allow 30 business days for receipt of this further documentation, if required. ED recognizes that some corrective actions may require longer than the prescribed 30 days, and in these instances, ED will work with the CDE to determine a reasonable timeline. In those instances where additional time is required to implement specific corrective actions, you must submit a request for such an extension in writing to ED, including a timeline for completion for all related actions.

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Our mission is to ensure equal access to education and to promote educational excellence throughout the nation.

Each State that participates in an onsite monitoring review and that has significant compliance findings in one or more of the programs monitored will have a condition placed on that program's grant award specifying that the State must submit (and receive approval of) documentation that all compliance issues identified in the monitoring report have been corrected. When documentation sufficient to address all compliance areas has been submitted and approved, ED will then remove the condition from your grant award.

With regards to the *Technical Assistance Recommendations* provided, we encourage you to employ these strategies to further support the effective implementation of the SIG program. ED staff will follow up with your staff over the next few months to see how the CDE is working to address these issues and make use of this technical assistance.

Please be aware that the observations reported, issues identified, and findings made in the enclosed report are based on written documentation or information provided to ED by SEA, LEA, or school staff during interviews. They also reflect the status of compliance in Indiana at the time and locations of ED's onsite review. The CDE may receive further communication from ED that will require you to address noncompliance occurring prior or subsequent to the onsite visit.

The ED team would like to thank Christine Swenson, Interim Director, District and School Improvement Division, and her staff for their hard work and the assistance they provided prior to and during the review in gathering materials and providing access to information in a timely manner.

We look forward to working further with your staff to resolve the issues contained in this report and to improve the quality of the SIG program in California.

Sincerely,



Patricia A. McKee
Acting Director
Student Achievement and
School Accountability Programs

Enclosure

cc: Christine Swenson

CALIFORNIA
Targeted Monitoring Review of
School Improvement Grants (SIG) under section 1003(g) of the
Elementary and Secondary Education Act of 1965
March 7 - 11, 2011

BACKGROUND

Overview of SIG Schools in California

Tier	Number of FY 2009 Eligible SIG Schools	Number of FY 2009 Served SIG Schools
Tier I	135	66
Tier II	48	25
Tier III	2708	0

Implementation of SIG School Intervention Models

Models	Number of Schools implementing the Model
Turnaround	29
Transformation	56
Restart	5
Closure	1

MONITORING TRIP INFORMATION

Monitoring Visits

LEA Visited	San Francisco Unified School LEA (SFUSD), Los Angeles Unified School LEA (LAUSD), San Bernadino City School LEA (SBCSD)
School Visited	San Gorgonia (SBUSD); Gompers Middle Schools (LAUSD); Everett Middle School (SFUSD)
Model Implemented	San Gorgonio High School: Transformation Model Gompers Middle School: Restart Model Everett Middle School: Turnaround Model
FY 2009 Funding Awarded (over three years)	Los Angeles Unified School LEA (for 9 Tier I and II SIG schools): \$52 million Gompers Middle School: \$5.6 million over 3 years San Francisco Unified School LEA (for 10 Tier I and II SIG schools): \$52 million Everett Middle School: \$5.6 million over 3 years San Bernadino City School LEA (for 11 Tier I and II SIG schools): \$58 million San Gorgonio High School: \$6 million over 3 years
SEA Visited	California Department of Education
FY 2009 SIG Award	\$412,732,454

Staff Interviewed

- **California Department of Education Staff**
- **San Francisco Unified School LEA Staff**
- **Everett Middle School Staff:** Principal, School Leadership Team, 4 Teachers, 10 Parents, Students, and 3 Classroom Visits
- **Los Angeles Unified School LEA Staff**
- **Gompers Middle School Staff:** Principal, School Leadership Team, 4 Teachers, 3 Parents, Students,

and 4 Classroom Visits

- **San Bernardino City School LEA Staff**
- **San Geronio High School Staff:** Principal, School Leadership Team, 5 Teachers, 8 Parents, and 4 Classrooms Visits

U.S. Department of Education Staff

Team Leader

Susan Wilhelm

Staff Onsite

Carlas McCauley, Nola Cromer, Zahreen Ghaznavi and Todd Stephenson

OVERVIEW OF MONITORING REPORT

The following report is based on U.S. Department of Education's (ED) on-site monitoring visit to California from March 7 – 11, 2011 and review of documentation provided by the State educational agency (SEA), local educational agencies (LEAs), and schools. The report consists of three sections: *Summary and Observations*, *Technical Assistance Recommendations*, and *Monitoring Findings*. The *Summary and Observations* section describes the implementation of the SIG program by the SEA, LEAs, and schools visited, initial indicators of success, and outstanding challenges being faced in implementation. This section focuses on how the SEA, LEAs, and schools visited are implementing the SIG program with respect to the following five areas: school climate, staffing, teaching and learning, use of data, and technical assistance. The *Technical Assistance Recommendations* section identifies strategies and resources for addressing technical assistance needs. The *Monitoring Findings* section identifies areas where the SEA is not in compliance with the final requirements of the SIG program and indicates required actions that the SEA must take to resolve the findings.

Please Note: The observations and descriptions included in this report reflect the specific context of the limited number of classrooms visited and interviews conducted at a small number of schools and LEAs within the State. As such, they are a snapshot of what was occurring at the LEA and school levels, and are not meant to represent a school's, LEA's, or State's entire SIG program. Nor are we approving or endorsing any particular practices or approaches by citing them.

SUMMARY AND OBSERVATIONS

Climate

San Francisco Unified School District

San Francisco Unified School District (SFUSD) selected the Turnaround Model for Everett Middle school, the site visited by the U.S. Department of Education staff. According to the needs analysis, SFUSD selected the turnaround model hoping that the implementation would encourage teachers to collectively adopt and fully commit to the necessary reform activities. As part of the LEA application, SFUSD reported in its needs analysis that during the 2009-10 school year (the year prior to SIG implementation), Everett staff focused their attention on developing consistent classroom management routines. The analysis reported that a small number of students who brought knives or other dangerous objects to school disrupted the collectively enforced tone of safety and order. The needs analysis reported 79 suspensions and 1 expulsion for the year prior to SIG implementation. In its application, SFUSD reported that the time the Everett school principal should spend on instructional improvement was often spent dealing with discipline challenges or managing the campus. Truancy was a major concern, and according to the LEA's application, 182 of the 427 students were identified as truant (3 or more days of unexcused absence during the 2008-09 school year.) The LEA's application also reported that students at Everett Middle school have a high need for social and emotional supports as students were the subject of 42 Child Protective Services reports in 2008 – 09 school year and over 100

students seek out the services of the school's Learning Support professional, who provides mental health services to support academic success and social/emotional well being.

Furthermore, the needs analysis identified that the expectations for learners were not clearly defined on a consistent basis across the Everett Middle school campus. A significant proportion of the classrooms demonstrated low expectations and routines of instruction are not consistently implemented. The needs analysis indicated a general lack of rigor in instruction and there were wide variations in student engagement.

In interviews the teachers, school administrators and students reported that the school felt safer since SIG implementation. During interviews, teachers spoke about the order that now exists in the school, the administration's actions to curb the inappropriate language used by students, and its focus on changing the culture of the school.

San Bernardino City Unified School District

San Gorgonio High School's (San Gorgonio) needs assessment indicated that student behavior and student attendance needed to be improved and that there needed to be greater home school connections. The leadership team and teachers interviewed reported that, prior to the implementation of the transformation model, many students did not come to class, or were locked out of the portable classrooms that house much of the campus when they were late to class. San Gorgonio's principal and leadership team also reported that, before the 2010-2011 school year, most students and parents did not know who the principal was.

During interviews, the Leadership Team indicated that the new principal has set the goal and the vision for the school, which everyone knows and is expected to work towards achieving. The principal reported that he has met with all students and provided them information about their test scores in language they can understand, as well as shared with them the goal for the school. In every classroom observed, the school goal for state exams was posted, and students could recite the goal in unison. Teachers reported that, now, there is one goal for the school, and that goal drives what programs are implemented as well as what materials and other resources are purchased. The San Gorgonio principal, leadership, and teachers also reported that all staff are now expected to ensure that students are in class. The school has also hired additional security guards to make sure that students are in class.

When parents were asked about changes at the school, they generally reported feeling that the principal was available to speak to them at all times about any questions or concerns. San Gorgonio has implemented the Parent Portal system. Through this system, parents can view their student's information, demographics, student class schedule, student course requests (next term classes), attendance data, grades, class assignments, and unofficial transcripts. The school has also used SIG funds to hire Community Resource Workers who conduct home visits and focus on students who are failing or who are not in class.

Los Angeles Unified School District

Los Angeles Unified School District's (LAUSD) needs assessment narrative described Gompers Middle School (Gompers) as a failing school located in one of the most difficult neighborhoods in Los Angeles. The students are amongst the poorest in the city, with an overrepresentation of foster care children, students with special education needs, and a significant population of English Language Learners. Prior to the restart model being implemented, the school staff and parents all described the daily battles waged and lost against the neighborhood gang violence that was spilling into the school. The teachers and parents all described Gompers' facilities as being unclean and unsafe. In 2008, the Mayor's Partnership (the Partnership) became Gompers's Educational Management Organization (EMO), and one of the core areas that the EMO focused its school improvement efforts was in school culture. The Partnership provided professional development to help improve discipline and classroom management through the program *Capturing Kids Hearts*. The Partnership also used SIG funds to hire two social workers, two psychologists, and a crisis response team to improve campus safety.

In interviews with the teachers, they reported that the professional development they received through *Capturing Kids Hearts* improved their classroom management and reduced the number of discipline incidents in the classroom. Teachers stated that there was a reduction in the number of fights in the hallways and school lockdowns from previous years, in large part because of the crisis response team. Both school leadership and staff reported that the social workers and psychologists have helped provide much of the counseling and personalized attention that students needed, leaving teachers to focus more on instruction. Students acknowledged that they saw more teacher control of the classroom and that they felt safe coming to school. All the parents emphasized how much cleaner and safer the school was since the Partnership had taken over.

Staffing

San Francisco Unified School District

Changes in Leadership

The principal at Everett Middle School was a recent hire and was retained as part of the implementation of the SIG model. The four teachers interviewed indicated that the principal and the recently-hired assistant principals provided a vision for the school. However, while the principal was hired within the previous two years, he stated that he was not hired as part of a reform.

Changes in Staff

In interviews with LEA leadership and teachers reported that the SFUSD did not replace staff in schools implementing the turnaround model before the start of the 2010 – 2011 school year. According to these interviews, in January 2011, the school notified staff who would be returning for the 2011 – 2012 school. Neither the LEA nor the school developed or used locally adopted competencies to make these decisions those teachers who would not be returning are continuing to teach at Everett for the remainder of the school year before transferring to another school or

retiring. The other schools implementing the Turnaround model also did not replace the staff before the start of the 2010 – 2011 school year.

San Bernardino City Unified School District

Changes in Leadership

San Bernardino City School District (SBCSD) began the process of replacing the principal at San Gorgonio by examining extensive school and district level data and then determining which person was the best match for the school. SBCSD staff also considered candidates that had a proven track record for improving student achievement. During interviews, SBCSD staff indicated that the new principal for San Gorgonio came from a high-performing school in the LEA with similar demographics. San Gorgonio's new principal was able to work with both SBCSD and school staff to develop the transformation plan. SBCSD staff also explained that all of the principals hired for the LEA's SIG schools came from higher achieving schools within the LEA or from neighboring LEAs. Each principal of the eleven schools implementing SIG models has a record of effectiveness. Many of them had led school reform at similar schools in the LEA. In all hiring, SBCSD examined a wide-range of data and looked for the best match between the data and experiences of candidates when hiring a new principal.

Changes in Staff

The new principal at San Gorgonio was appointed in July 2010. San Gorgonio teachers were required to sign a letter of commitment. Teachers who elected not to sign the letter of commitment were involuntarily transferred. In addition, San Gorgonio's plan indicates that the school will implement a process beginning in August 2011 to identify and remove staff who have not improved professional practice after ample opportunities have been provided for them to do so.

SBCSD staff indicated that on May 15, 2010, principal assignments were made for its eleven Tier I and Tier II schools. Central level district staff met with the transformation and turnaround principals to ensure that their vision for implementing the designated model was clearly articulated and focused. SBCSD staff indicated that they have a good relationship with the labor union. They have already worked jointly on the compensation issues as well as the involuntary transfer issue.

Los Angeles Unified School District

Changes in Leadership

The Mayor's Partnership assumed management and control of Gompers in July 2008. When recruiting and screening the EMO, LAUSD looked at the business, personnel and financial qualifications of the EMO as well as its previous experience. Prior to being taken over by the Partnership, the school leadership and staff at Gompers indicated that the school had gone through several leadership changes, which contributed to a culture that lacked both accountability and high expectations for student behavior and achievement.

At the time the Partnership took control, the EMO hired the current principal. The school leadership team, teachers, and parents all praised the principal, noting her openness and willingness to listen and implement new ideas. Staff also spoke of how the Partnership cut through the bureaucracy of the LEA, making it easier for them to obtain the staff and supplies they had needed for years. However, responses to interview questions suggested that the Partnership had not provided an overall vision for reform. LAUSD officials indicated that the Partnership has faced a few difficulties that may have affected the cohesiveness of the organization's academic mission. They stated that the Partnership's Superintendent of Instruction, whose experience and leadership was one of the main reasons the LEA signed the original MOU with the EMO, had left recently along with some of the main instructional staff. The LEA also explained that within the Partnership's higher management, there are few with educational backgrounds or experience. In order to compensate for this, LAUSD staff explained that they have worked at the school level to provide Gompers instructional support and professional development.

Changes in Staff

In Gompers' needs analysis, LAUSD reported that prior to SIG implementation, key stakeholders lacked a sense of shared values and beliefs about student academic and behavioral expectations. Teachers were frequently late for class or absent; teacher attendance, prior to the Partnership assuming control, was 86%. In interviews, teachers reported that there had been a high turnover in the teaching staff. Therefore, much of Gompers' staff was new to the LEA. For example, during the 2008-2009 LAUSD budget crisis, school leadership stated that because of LAUSD's layoff policies, over 50% of its staff was laid off at the end of that school year. The school leadership indicated that the high numbers of layoffs adversely affected their ability to re-staff the school. New staff reported that in order to be hired at Gompers, they went through an initial resume screening, then were interviewed by a team comprised of Gompers' school leadership, Partnership staff, a union representative, and some current teaching staff. However, the school leadership team did not provide evidence of using any particular criteria to screen applicants. Both new and returning staff reported that they felt that the teaching culture has changed for the better as a result of the increased professional development and change in leadership. They felt that the work culture now promoted collaboration and professional growth. Parents reported that they felt the staff was easier to communicate with and that their students feel respected and cared for by the staff.

Teaching and Learning

San Francisco Unified School District

Everett Middle School's need assessment indicated that there was a general lack of rigor in instruction and wide variations in student engagement. Moreover, the analysis indicated that the curriculum was not rigorous across all academic areas, there was little coherence among grade levels about the content to be taught, and teachers rarely evaluated their practice in light of the curriculum. The analysis also highlighted that the lack of instructional leadership contributed to poor choices in the use of materials within the classroom. Further, while some teachers are

exceptionally motivated and work to improve their practice, they do so out of their own motivation and receive no support from the school community.

In interviews, the school leadership indicated that it was focusing its efforts on instruction. Everett Middle School staff indicated it had hired additional teachers to implement the Read 180 program and other instructional programs designed to address the needs of English Language Learners.

San Bernardino City Unified School District

SBCSD identified alignment of federal, state, and private resources as an area of need for all of its SIG schools. As one of the first actions, each new principal was to work with the newly-established Turnaround Office, school site councils, and district staff to align all budgets to support a unified vision of the school transformation or turnaround.

The San Gorgonio needs assessment indicated the following specific needs:

- More students need to pass Algebra I and other core classes in the ninth grade;
- Professional development needs to focus on engaging, student-centered instructional strategies, including checking for understanding and higher-level questioning;
- Student access to higher-level curriculum must be increased, especially for poor and minority children.
- More and targeted support with increased instructional minutes for students in need of support, and strategies for enrichment, and accelerated curriculum.
- A fully-aligned and articulated curriculum, featuring rigor and appropriate student support, particularly in English and math; and
- Active learning strategies.

San Gorgonio's staff stated during interviews that, prior to the implementation of the transformation model during the 2010-2011 school year, there was a great disparity among teachers in following the pacing guide. Teachers reported that the pace of instruction was generally regulated by the ability of individual groups of students to comprehend the material. San Gorgonio implemented a revised daily schedule in the 2008-2009 school year. This schedule allowed for two hours per week of professional development, collaboration, and instructional support. The leadership team reported that, prior to the 2010-2011 school year, this time seemed to be spent primarily on individual lesson planning, rather than on focused professional development, collaboration and instructional support activities.

In response to these needs, San Gorgonio's SIG application indicated the school would implement several key strategies. School staff indicated that the school has ensured that, during late-start Thursdays, opportunities for communication have been improved including staff

meetings for all staff, meetings between school and LEA staff, and structured department meetings. The school has now instituted professional learning communities (PLCs) which meet during the allotted time on Thursdays. The PLC's are grade-specific and content area-focused and are structured to enable teachers to collaborate through sharing curriculum, best practices, and standards-based instructional strategies. Each PLC also develops and implements a curriculum-aligned set of tests to measure and inform timely decisions including when to continue instruction and when to re-teach. All staff mentioned that the PLC process encourages them to be more data focused. During interviews, the leadership team described how the new structure for its PLCs allows teachers to meet by grade level to analyze student data and collaboratively develop standards based lessons. Teachers indicated that having structured PLCs has helped direct everyone towards a clear goal. Teachers noted that there is much more focus on finding strategies that work and, consequently, the conversations begun during the PLC time extend into lunch time and after school.

San Geronio staff also stated that implementation coaches work with teachers to align pacing guides with the curriculum, and ensure that an accurate reading assessment is conducted for every ninth and tenth grade student in order to ensure placement in targeted interventions.

San Geronio's SIG plan also indicates that additional teachers have been hired to provide reduced class size for reading and Algebra intervention classes and individualized support in the credit recovery/reengagement classes. A ninth grade academy has been created to ensure that all ninth graders have the study skills and habits, academic support, and social support necessary to be successful. San Geronio has also implemented a mandatory seventh period for all ninth graders. Additionally, the school eliminated ability tracks in order to provide opportunities for students to enroll in advanced coursework and added an optional seventh period for tenth, eleventh, and twelfth graders to provide them with interventions, enrichment, core, and study-skills electives options. San Geronio had also identified a credit recovery program that is provided to all credit-deficient eleventh and twelfth graders.

SBCSD's SIG application indicated it would create a Turnaround office to provide the conditions for school improvement, effectively build parent and community support, contract with external partners, monitor fidelity of plan implementation and progress, build leadership capacity, problem solve, and maintain communication and coordination. The Turnaround Office was to have a Turnaround Leader who had a record of effectiveness improving outcomes for schools and an ability to navigate the LEA system and ensure resources and support for schools. Rather than hiring staff for the Turnaround Office, the SBCUSD has utilized existing staff members who are already assigned various duties in the Title I office. These staff members reported that they have provided assistance to the SIG schools specific to monitoring the fidelity of plan implementation and progress, building leadership capacity, problem solving, and maintaining communication and coordination

Los Angeles Unified School District

According to its needs assessment, student achievement at Gompers has been stagnant; the school has been in program improvement for 10 years. In 2009, only 12% of students were proficient in Math and 14% were proficient in English/Language Arts (ELA). The needs

assessment also indicated that Gompers had challenges serving its special education and ELL students, with both groups achieving below 3% proficiency in ELA and Math. The Partnership staff reported that in their initial assessment of instructional practices, they believed there was a great variance in classroom environments, instructional planning and delivery, and student academic and behavioral expectations. Common planning time was not a regular practice and professional development was not job-embedded.

In response, the Partnership planned to use its SIG funds for various types of professional development. In its SIG plan, the EMO describes summer planning time, where Gompers was partnered with the University of California – Los Angeles (UCLA) to conduct a 2-week summer institute to improve instruction, culminating in a complete professional development plan for the year. The Partnership also planned to bring in six content coaches from UCLA to support teachers across all the core subject areas. School leadership also explained that they had instituted a balanced literacy approach for all ELA classes, and that much of the professional development at the school has revolved around it. Gompers leadership and staff explained that City Year tutors were placed in many of the classes to provide additional individualized attention to students and instructional support for teachers.

In interviews, teachers explained how the amount of professional development they received has increased. All the teachers explained how useful the UCLA instructional coaches have been in improving the quality of their instruction. They stated that the professional development the UCLA coaches provided is relevant to their job and specific to current lessons and identified student needs. ELA teachers interviewed expressed that the balanced literacy program and professional development surrounding that has been helpful in improving their literacy instruction. However, the teachers provided conflicting explanations about the content of their balanced literacy training. All teachers said how helpful the City Year tutors have been, because they provided the extra attention that students needed and helped with classroom management.

In classroom observations, students appeared engaged and all ELA classrooms visited were implementing aspects of balanced literacy. City Year tutors were present, providing one-on-one assistance to students as requested. Unlike the ELA teachers, math teachers stated that they had not been provided a similar program or any specific professional development for their subject outside of the UCLA coaches. When staff and school leadership were asked about the student impact of these changes in instruction, they stated that they saw improvements in student behavior and engagement. However, they could not articulate whether they had seen a difference in student achievement as measured by the periodic assessments or their own teacher created assessments.

Use of Data

San Francisco Unified School District

The needs analysis for Everett Middle School indicated that due to the lack of direction in terms of clear goals and objectives, lack of benchmark assessments and use of data for planning instruction, it has been difficult to plan appropriately targeted professional development based on clearly identified instructional needs.

In interviews, LEA and school staff indicated that teachers and administrators are meeting to analyze the data that are being accumulated by Partners in Innovation. The staff at Everett Middle reported that the school is now analyzing benchmark data to evaluate the progress of each student.

San Bernardino City Unified School District

San Gorgonio's needs assessment indicated that teachers had improved access to student data as a result of the schoolwide implementation of DataDirector. However, the use of student data varied greatly from department to department.

The school staff reported that the school has contracted with a company to introduce the Classroom Diagnostic Assessment System (CDAS) to each PLC. These data-driven assessments allow for each PLC to develop a standards-based and curriculum-aligned series of tests to measure and inform timely decisions regarding students' mastery of standards, including when to continue instruction and when to re-teach. Some teachers indicated that they believe that the flexibility of this assessment model allows for the kind of immediate response and attunement to student needs that is necessary in order to raise individual student achievement and understand the type and kind of individualized support necessary to deliver effective instruction. School staff stated that approximately 90 percent of staff in each department has begun to develop and implement the CDAS model. Those remaining PLCs which have not are following an iterative process of common assessment based on S.M.A.R.T. goals.

San Gorgonio staff reported during interviews that the school's staff is focused in terms of test data. A universal screening process is used with all ninth graders in order to ensure correct placement as well as to determine which students may need additional interventions.

SBCSD staff indicated that, as part of the needs assessment, the deputy superintendent hired eleven site managers to work at the SIG schools. These new site managers conducted cabinet meetings at the school sites, and public meetings with the community. Site managers also spoke with school staff. They looked at many different kinds of data, including data indicating achievement gaps, grades versus California Standardized Test (CST). The data also were used to determine who the best principal/leader for each school would be.

Los Angeles Unified School District

Gompers' needs analysis did not address the use of data at the school prior to receiving the SIG award. The school leadership indicated that the use of data to drive instructional decisions was not the norm amongst Gompers' staff prior to the Partnership assuming control. In Gompers' SIG proposal, the school was going to implement instructional rounds, where teachers would use focused observation and data analysis to drive instructional choices and student interventions. However, at the time of the visit, these instructional rounds had not been occurring on a regular basis. ELA teachers stated that they used their running records and number of informal reading assessments to judge where their students were, but could not convey how these multiple

measures were used to guide interventions used with students or change course with their instruction. In staff interviews, teachers of subjects other than ELA, stated that the UCLA instructional coaches occasionally provided them assistance with analyzing student achievement data. Yet, the school leadership and teachers did not indicate that they analyzed and used student achievement data for other subjects on a regular basis.

When asked how the LEA's periodic assessment was used, the teachers interviewed said they felt that the assessment did not correlate with what they were teaching in their classrooms. The teachers also indicated that they did not believe that the periodic assessment data collected was representative of their students' learning or academic growth. They also indicated that they could suggest to the principal professional development activities or strategies that they felt were "good ideas" and that, if funds were available, these activities and strategies were then provided. However, the teachers did not indicate that these activities were based on needs identified by the student achievement data.

Technical Assistance

San Francisco Unified School District

In interviews, SFUSD staff reported that it received technical assistance support from the California Department of Education (CDE). The support included webinars on the rules and regulations of the School Improvement Grant, the State's application process and timeline, and budget preparation.

San Bernardino City Unified School District

In interviews, SBCSD staff reported that they received a lot of feedback and technical assistance from the CDE which was very helpful in completing the LEA application. Staff also indicated that they have direct access to CDE staff and have found them very helpful in answering all questions. They also reported that the CDE had webinars, phone conferences and a SIG handbook as part of its technical assistance.

SBCSD conducts monthly SIG principal meetings at the LEA office to talk about SIG implementation and any issues those schools are facing. These meetings also provide an opportunity for principals to receive assistance and share ideas about making things work. SBCSD has provided training on PLC and technology. The school principal mentioned that he received a lot of support from central office staff.

SBCSD staff indicated that they are still working on the teacher evaluation component of the transformation model with the union. However, until that evaluation system is developed and operating, they are trying to understand whether the measures are valid and reliable as well as determining how to measure a student's achievement using standardized test scores.

Los Angeles Unified School District

In its SIG application LAUSD proposed that it would provide technical assistance in the following areas: teacher evaluation, providing performance incentives for teachers, and using local school site councils to provide professional development. For implementation of a teacher evaluation system, LAUSD created a SIG ad-hoc committee composed of LEA staff, union representatives, and staff from each of the SIG schools. The Ad-hoc committee is charged with learning about different teaching and leadership models and to create and pilot a teacher evaluation system in the SIG schools.

As of the date of the monitoring visit, the Ad-hoc committee met once to discuss an initial framework for the evaluation system and decided to contract with a company for professional development on teacher evaluation. LAUSD staff stated that they expect to have a full teacher evaluation system to implement in the SIG schools by next school year. However, LAUSD staff reported that the planned technical assistance had not yet been implemented due to the fact that the LEA did not actually receive its SIG funds until December 2010, preventing them from staffing the Office of Turnaround Schools, the unit which was to carry out the technical assistance.

TECHNICAL ASSISTANCE RECOMMENDATIONS

Issue 1: SBCSD staff indicated that they are trying to understand how to determine whether the measures are valid and reliable as well as determining how to measure a student's achievement using standardized test scores.

Technical Assistance Strategies:

- Provide focused technical assistance to the LEA to assist it with developing multiple measurable standards of student achievement, as part of the teacher evaluation process.

Issue 2: SBCSD staff indicated that they need guidance from the CDE regarding when budget amendments are necessary as well as information on whether schools may: move funds within an object code; move funds from one object code to another; and when SEA and/or school board approval is needed.

Technical Assistance Strategies:

- Provide guidance to LEA program and fiscal staff on the processes for moving funds within an object code, moving funds from one object code to another, and when amendments are necessary. (CDE)

Issue 3: SBCSD staff indicated that they underestimated how much they would need in terms of Human Resources and how many new teachers they would need. The SBCSD's commission is not letting the LEA hire classified positions.

Technical Assistance Strategies:

- Provide information/technical assistance to commissions/boards regarding requirements of the SIG grant.

Issue 4: The CDE has not monitored schools implementing SIG.

Technical Assistance Strategies:

- Because the State legislature has not allowed CDE staff to travel, the Department recommends technical assistance for the SEA to develop off site monitoring techniques.

MONITORING FINDINGS

Summary of Monitoring Indicators

Critical Element	Requirement	Status	Page
1. Application Process	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	
2. Implementation	The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	
3. Fiscal	The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87]	Finding	
4. Technical Assistance	The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Met Requirements	
5. Monitoring	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	
6. Data Collection	The SEA ensures that data are being collected consistent with the final requirements of the SIG program. [Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Met Requirements	

Monitoring Area: School Improvement Grant

Critical Element 1: The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program.

Finding (1): The SEA did not ensure that its application process was carried out consistent with its approved SIG application. The CDE conducted the application review and identified schools to be funded. The SEA directed the CDE to prepare a request for waiver not to carry over the required 25 percent of 2009 SIG funds and to impose a school size funding cap for each school. This allowed all approvable priority one and priority two LEAs to be funded, regardless of application score. The CDE then asked all LEAs with approvable applications to reduce their budgets, not to exceed the school size maximum allocation amount.

Citation: Sections II.B. of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), requires a State to submit to ED for approval an application that contains such information as the Secretary may reasonably require. The FY 2009 SIG application required States to describe their process for reviewing LEA applications.

Further action required: Prior to taking its FY 2010 slate to the California State Board of Education for approval, the CDE must provide to ED evidence that it administered its competition consistent with its approved FY 2010 SIG application. The evidence must include the number of reviews conducted and the specific criteria used to determine individual school budgets. (Also see Further Action Required for finding 2.)

Findings (2): The CDE did not ensure that award amounts were made consistent with the SIG requirements. In SFUSD, Mission High School was awarded \$2,014,668.00 which exceeds the amount permitted by the final requirements.

Citation: Section II.B.5 of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), requires that an LEA's total grant may be not less than \$50,000 or more than \$2,000,000 per year for each Tier I, Tier II and Tier III school the LEA commits to serve.

Further action required: Prior to taking its FY 2010 slate to the California State Board of Education for approval, the CDE must provide to ED evidence that it administered its competition consistent with its approved FY 2010 SIG application. The evidence must include the number of reviews conducted and the specific criteria used to determine individual school budgets. (Also see Further Action Required for Finding 1.)

Critical Element 2: The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program.

Finding (1): The CDE did not ensure that schools implementing the turnaround model rehire no more than 50 percent of the staff. SFUSD did not replace staff in schools implementing the turnaround model before the start of the 2010 – 2011 school year as required.

Citation: Section I.A.2(a)(ii)(A) of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) requires that an LEA implementing the turnaround model, using locally developed competencies to measure the effectiveness of staff who can work within the turnaround environment to meet the needs of students, screen and rehire no more than 50 percent of the staff.

Further action required: The CDE must submit to ED evidence that it has reviewed the progress of all schools that received FY 2009 SIG funds to implement the turnaround model to ensure that these schools have, using locally developed competencies to measure the effectiveness of staff who can work in the turnaround environment, screened all existing staff and rehired no more than 50 percent as required. The CDE also must submit to ED the results of that review and the steps it will take to ensure that all schools that received FY 2009 SIG funds to implement the turnaround model that have not already screened and rehired no more than 50 percent of the staff using locally develop competencies, have done so by the beginning of the 2011-2012 school year. (Also see finding for Critical Element 5.)

Finding (2): The CDE did not ensure that SFUSD replaced the principal in a school implementing the turnaround model consistent with the SIG final requirements. The SFUSD hired the principal at Everett Middle School within the two year period during which the regulations permit an LEA to continue a previously implemented intervention. However, although the principal was hired within the previous two years, the principal was not hired as part of a broader reform effort.

Citation: Section I.B.1 of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), states an SEA may award school improvement funds to an LEA for a Tier I or Tier II school that has implemented in whole or in part, an intervention that meets the requirements under section I.A.2(a), 2(b) or 2(d) of these requirements within the last two years so that the LEA and school can continue or complete the intervention being implemented in that school.

Further action required: The CDE must submit to ED evidence that it has reviewed the progress of all schools that received FY 2009 SIG funds to implement the transformation and turnaround model to ensure that any principal hired within the last two years who was retained, was retained consistent with the SIG requirement. The CDE also must submit to ED the results of that review and the steps the CDE will take to ensure these schools are either in compliance with the SIG requirements or indicate how it will take this into account in determining whether to continue the grant for the 2011-2012 school year. (Also see finding for Critical Element 5.)

Finding (3): The CDE did not ensure that SFUSD implemented extended time in Everett Middle School, as required for the turnaround model. SFUSD believed that Everett Middle School extended the school day by an hour six years ago and due to this reason was not required to implement any additional time.

Citation: Section I.A.2(a)(viii) of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)), requires an LEA implementing the Turnaround model to establish schedules and implement strategies that provide increased learning time (as defined in the final requirements.)

Further action required: The CDE must submit evidence to ED that it has reviewed each LEA that received FY 2009 SIG funds to implement the transformation model to determine if extended learning time is actually being provided consistent with the SIG final requirements. Additionally, the CDE must submit to ED a timeline for implementation of extended learning for any school it determines is not currently doing so.

Critical Element 3: The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program.

Finding: Everett Middle School, in SFUSD, plans to use the SIG funds to support a summer bridge program that will enroll 20 students. Students participating in the program will come from both Everett Middle School and Horace Mann Middle school, another SIG school located within the LEA. Student participation in the summer bridge program is limited to a small number of students and it is not clear how the program will contribute to turning around either school.

Citation: Section I of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) requires that schools implement rigorous interventions designed to support significant reforms to improve educational outcomes in our nation's lowest-performing schools. Office of Management and Budget Circular A-87, which governs the use of Federal funds (including SIG), requires that the use of funds for a specific purpose be necessary and reasonable for the proper and efficient performance and administration of the program and be authorized and not prohibited under State and local laws or regulations.

Further action required: The CDE must notify SFUSD that it must submit an amendment to its approved SIG application if it wants to use SIG funds to implement a summer bridge program. The amendment must include the criteria that SFUSD will use to determine which students may participate and a rationale for how the program supports the overall goal of turning around both Everett Middle School and Horace Mann Middle Schools. The CDE must review the amendment to determine if the proposed expenditure is consistent with the overall goals of SIG and whether it is reasonable and necessary to carry out SIG implementation in both schools.

Critical Element 5: The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program.

Finding: The CDE is not monitoring SIG implementation as outlined in its approved application.

Citation: Section 80.40 of the Education Department General Administrative Regulations (EDGAR) states that grantees must monitor grant and subgrant activities to ensure compliance with applicable Federal requirements. Section 9304(a) of the ESEA requires that the SEA must ensure that (1) programs authorized under the ESEA are administered in accordance with all applicable statutes, regulations, program plans, and applications; and (2) the State will use fiscal control and funds accounting procedures that will ensure the proper disbursement of and accounting for Federal funds.

Further action required: The CDE must submit to ED a timeline and monitoring protocol for onsite and offsite monitoring for FY 2009 and FY 2010 SIG recipients. The CDE must also submit to ED evidence that the timeline is being implemented.