



**Indiana
Department of Education**

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To: State Board of Education

From: Danielle Shockey

Subject: A-F Impacts Summary

Date: September 9, 2015

Attached is the most recent draft (shared on September 4, 2015) with State Board of Education staff, legislative staff and Governor's office staff on the impacts related to the delay of the 2014-2015 A-F final placements.

There is an ongoing discussion between the IDOE staff, SBOE staff, and legislative staff regarding the timeline with A-F placement that could impact this document.

Additional collaboration on field guidance related to these impacts is also being discussed with these above groups. We will provide copies as these drafts are brought to finalization.

If you have any questions regarding this impact chart please do not hesitate to contact me at dshockey@doe.in.gov.



IMPACTS OF ACCOUNTABILITY DELAY

ACCOUNTABILITY

AREA IMPACTED	REQUIREMENT/S	HOLD HARMLESS <u>WITH</u> 2014/2015 GRADES ISSUED	HOLD HARMLESS <u>WITHOUT</u> 2014/2015 GRADES ISSUED
<u>A-F Rule EXPIRED</u> <ul style="list-style-type: none"> • 511 IAC 6.2-6 • IC 20-31-8-5.4 	<ul style="list-style-type: none"> • Emergency rules authorized under IC 20-31-8-5.4 expired November 15, 2014, voiding the old A-F rule language • No active A-F model currently exists • Attorney General opinion on 9/3/15 directed the use of the same set of A-F rules the state applied in the 13-14 SY's A-F calculations with the exception of the language adopted by the board to address schools with atypical configurations and high school weights due to expiration. 	<p>Creates legal issues by calculating grades based upon a rule that schools have not had clear notice as to which rules would govern their 14-15 calculations.</p>	<p>Avoids legal issues that may arise as a result of using an A-F rule that the field was aware was in place.</p>
<u>New School Accountability Model</u> <ul style="list-style-type: none"> • 511 IAC 6.2-10 • IC 20-31-8-5.4 	<ul style="list-style-type: none"> • Schools will utilize a new accountability system based on individualized student growth beginning for the 15-16 school year • Focus this school year at all levels should be on learning the new system of accountability, the metrics within it and how student growth will be calculated. • Submission of amendment to the USED Flexibility Waiver on new model is due by Feb. 1, 2016 	<p>Dual focus on old and new system will have great overlap with delay</p>	<p>Sole focus and professional development by the IDOE to the state, educators, parents and students would be on new model.</p>
<u>School Corporation Annual Performance Reports</u> <ul style="list-style-type: none"> • IC 20-20-8-3 	<ul style="list-style-type: none"> • The governing body of a school corporation must publish an annual performance report of the corporation once annually between March 15 and March 31 	<p>Option 1: Seek legislative amendment to adjust the timeline based on A-F grade release</p>	<p>APR would be issued on time with note that reflects no accountability grade was issued for 14/15 school year</p>

<ul style="list-style-type: none"> • IC 20-20-8-8 (version b) 	<ul style="list-style-type: none"> • APR must include the school's A-F placement • School corporations will not be able to meet the statutory APR deadline 	<p>Option 2: Schools provided with all data necessary for the APR and provide A-F grade as soon as available to supplement the published APR</p>	
<p><u>Federal Reporting</u></p> <ul style="list-style-type: none"> • Secs. 9302 & 9303, ESEA • Sec. 1111(h)(4), ESEA 	<ul style="list-style-type: none"> • Indiana must submit the consolidated state performance report (CSPR) by Dec. 16, 2015, which includes assessment & accountability data 	<p>Complete and submit a request to USED for flexibility in submission timeline and submit CSPR in March with final A-F grades, if request approved</p>	<p>Pursue USED-approved option to carry over 13/14 accountability information and complete and submit an amendment to the waiver</p>

CHARTER SCHOOLS

AREA IMPACTED	REQUIREMENT/S	HOLD HARMLESS WITH 2014/2015 GRADES ISSUED	HOLD HARMLESS WITHOUT 2014/2015 GRADES ISSUED
<p><u>Charter & Innovation Network School Grant</u></p> <ul style="list-style-type: none"> • IC 20-24-13-4 • IC 20-24-13-5 	<ul style="list-style-type: none"> • SBOE shall reward a grant to a charter that doesn't first apply if the charter is either a charter in its 1st or 2nd year of operation; a charter with an "A", "B" or "C" for the most recently completed school year; a charter that doesn't receive a grade for the most recently completed school year; a charter that has a majority of students with developmental, intellectual or behavioral challenges; or an innovation network school • Applications for grants must be submitted after July 1 and before September 1, 2015 of a state fiscal year for a grant that is requested to be made during that state fiscal year • SBOE shall determine if a charter is placed in the same or a better A-F category for the most recently completed school year than the nearest non-charter public school that is configured to teach the same grades of students as the charter teaches • If the charter has been placed in the same or a better A-F category, the SBOE shall make the grant to the charter • If for 2 consecutive years the charter school hasn't been placed in the same or a better A-F category for the most recently completed school than the nearest non-charter public school that is configured to teach the same grades of the students as the charter teaches, the charter isn't eligible for a grant unless the charter receives a "C" or better for the most recently completed school year 	<p>Need to seek legislative amendment to address timelines and adjust the application submission window to align with the timeline for A-F grades</p> <p>Grants will not be received by charter schools until Spring 2016 at the earliest</p>	<p>Distribute grants based on the 13/14 grades so the statutory timeline may be met and charter schools may receive funds within a reasonable time</p>

CHOICE PROGRAM

AREA IMPACTED	REQUIREMENT/S	HOLD HARMLESS WITH 2014/2015 GRADES ISSUED	HOLD HARMLESS WITHOUT 2014/2015 GRADES ISSUED
<u>Application Cycle</u> <ul style="list-style-type: none"> IC 20-51-4-7 	DOE shall accept applications from March 1 – September 1 annually for choice scholarship students or eligible schools for the upcoming school year-Delay will conflict with statutory requirement to open application window no later than March 1.	Option 1: Caveat may be included in the award letter that the student’s eligibility & a school’s eligibility may change depending on the final outcome for 14/15 grade placement Option 2: Wait to release award letters until the final outcome for 14/15 grade placement (substantially shortening application window)	Award letters will be able to be sent out by the statutory deadline, which will prevent a delay in processing of choice scholarships by the IDOE
<u>“F” Pathway Eligibility</u> <ul style="list-style-type: none"> IC 20-51-1-5 	One definition of an “eligible choice scholarship student” is a student who would be required to attend a public school that received an “F”, and is a member of a household with an annual income of not more than 150% of the amount required for the individual to qualify for the federal free or reduced lunch program	Eligible choice scholarship students will not be identified until after 14/15 grades are finalized, which substantially shortens the application submission timeline	Eligible choice scholarship students would be identified and given opportunity based upon the hold harmless 13/14 grade.
<u>Eligibility of Schools</u> <ul style="list-style-type: none"> IC 20-51-4-9 	<ul style="list-style-type: none"> DOE must suspend choice scholarship payments for 1 year for new students if a school receives 2 consecutive “Fs” DOE must suspend choice scholarship payments for new students until the school receives a “C” or higher for 2 consecutive years if the school receives 3 consecutive “Ds” or “Fs” DOE must suspend choice scholarship payments for new students until the school receives a “C” or higher for 3 consecutive years if the school receives 3 consecutive “Fs” 	“Suspended” schools will not be identified until after 14/15 grades are finalized, which substantially shortens the application submission timeline	No new schools would be suspended from choice scholarship payments due to hold harmless and no new grades

EDUCATOR EFFECTIVENESS

AREA IMPACTED	REQUIREMENT/S	SPECIFIC AREAS IMPACTED	HOLD HARMLESS WITH 2014/2015 GRADES ISSUED	HOLD HARMLESS WITHOUT 2014/2015 GRADES ISSUED
<p><u>Staff Performance Evaluations</u></p> <ul style="list-style-type: none"> IC 20-28-11.5 	<ul style="list-style-type: none"> Districts must develop a plan for annual staff evaluations Plans must include annual performance evaluations of all certificated employees; objective measures of student achievement & growth to significantly inform the evaluation; rigorous measures of effectiveness; annual designation of each certificated employee; an explanation of the evaluator's recommendations for improvement & timeline for improvement; provision that teacher who negatively affects student achievement & growth can't receive a rating of highly effective or effective, the plans need state assessment data to finalize SLOs (utilized for non-testing subject teachers) SBOE & DOE must develop a model evaluation plan Principals shall report aggregate results of evaluations for the school for the previous school year before August 15 of each year to the superintendent & school board at a public meeting Schools, including charters, must report disaggregated results of evaluations by SPNs to the DOE before November 15 of each year Before December 15 of each year, DOE shall report the results of evaluations in 	Individual Growth Model	Evaluations could not be finalized until after January 2016 because IGM data will not be available until that time	<p>Option 1: Use other data as primary measure for education evaluations instead of IGM</p> <p>Option 2: 13/14 IGM data would be utilized in evaluations</p> <p>Option 3: Only the rubric score would be utilized in the evaluation and testing data would be excluded from the evaluation</p>
		Student Learning Objectives	IDOE to issue guidance that LEAs may utilize other assessment data to determine SLOs	IDOE to issue guidance that LEAs may utilize other assessment data to determine SLOs
		Summative Ratings issued by IDOE	<p>Ratings would not be finalized by statutory deadlines of November 15th and December 15</p> <p>Summative ratings being unavailable until after January 2016 means educator evaluations cannot be finalized and related 2014-2015 school year compensation cannot be allocated.</p>	<p>Option 1: Schools would utilize previous year's evaluation rating</p> <p>Option 2: All student learning measures may be left out of the evaluation and only observations may be used for learning measures</p>
		Negative Impact	Option 1: Negative Impact will not be able to be determined until after January 2016 therefore, educator evaluations cannot be finalized and related 2014-2015 school year compensation cannot be allocated	Option 1: No negative impact would be determined or utilized in staff performance evaluations and compensation
			Option 2: No negative impact would be determined or utilized in staff performance evaluations and raises	Option 2: Schools would carry over the negative impact from the previous year's determination

	the aggregate to the SBOE & to the public	RISE	<p>Option 1: Schools would not be able to finalize evaluations until final placement of A-F grades</p> <p>Option 2: Schools may be advised to utilize the rubric score only and exclude testing data from the evaluation to meet timelines</p>	Schools would utilize last year's school grade for this year's final teacher evaluation
<p><u>School Performance Grant 30 M;</u></p> <p><u>\$2 Million Excellence in Performance Grants for Focus/Priority Schools;</u></p> <p><u>Local Policies for general fund raises</u></p> <ul style="list-style-type: none"> • IC 20-43-10-3 	<ul style="list-style-type: none"> • The 30M school performance grant is to be allocated among & used to pay cash stipends to all teachers rated effective or highly effective & employed by the district as of December 1 • Districts have to distribute to teachers by January 31 the school performance grant • \$2 million awards must be expended by June 30, 2016 	N/A	<p>Assessment data that is due to the Department by December 15th from CTB will be used in the calculation for the 30M in School Performance Awards</p> <p>The Department will calculate school performance awards and release to schools no later than December 31, 2015.</p> <p>Guidance to the field will recommend local adjustment for the exclusion of A-F grades in the final evaluation calculation.</p> <p>Recommendation will include that whatever measure is locally determined for replacement of the A-F grade metric within the final evaluation calculation would to still have student achievement and growth measures as primary indicators.</p> <p>This guidance on adjustment of the A-F exclusion on the educator evaluation system will allow for locals to distribute the school performance awards no later than January 31, 2016.</p> <p>\$2 million grant application will be made available no later November 2015, with the guidance indicating that 2013-2014 school focus/priority status would be the metric for this application along with the educator evaluation that will be able to be final after mid-January upon receipt of IGM and Negative impact data from IDOE.</p>	<p>Schools would utilize last year's evaluation rating for this year & funds would be distributed by January 31st statutory deadline</p> <p>IDOE would utilize previous year's data and run with new performance grant formula</p> <p>IDOE would utilize focus/priority schools identified in 13/14 for \$2 million grants</p>

OUTREACH/SCHOOL IMPROVEMENT

AREA IMPACTED	REQUIREMENT/S	HOLD HARMLESS WITH 2014/2015 GRADES ISSUED	HOLD HARMLESS WITHOUT 2014/2015 GRADES ISSUED
<p><u>Federal Monitoring of Priority Schools</u></p> <ul style="list-style-type: none"> ESEA Waiver, Principle 2.D 	<ul style="list-style-type: none"> Any school receiving an “F” is classified as a priority school To exit priority status, a school must maintain a “C” or better for at least 2 consecutive years or be a reward school for 1 year Monitoring will begin in September of priority schools. Schools are required to do a student achievement plan that includes a root cause analysis & determining priority areas for improvement 	<p>If 14/15 grades are delayed until March, schools will not be able to complete the required student achievement plan nor will IDOE be able to identify a new cohort of priority schools until March, not allowing for completion of required monitoring visits by years end.</p> <p>IDOE will submit an amendment to carry over the 14/15 priority schools that were determined based on 13/14 A-F grades & conduct monitoring and support based on that cohort of schools.</p>	<p>IDOE will submit an amendment to carry over the 14/15 priority schools that were determined based on 13/14 A-F grades & conduct monitoring and support based on that cohort of schools.</p>
<p><u>Federal Monitoring of Focus Schools</u></p> <ul style="list-style-type: none"> ESEA Waiver, Principle 2E 	<ul style="list-style-type: none"> Any school receiving a “D” and isn’t identified as a priority school or has a graduation rate under 60% for 2 consecutive years is classified as a focus school To exit focus status, a school must maintain a “C” or better for at least 2 years or earn the status of being a reward school for 1 year Monitoring of focus schools must be conducted Schools are required to do a student achievement plan that includes a root cause analysis & determining priority areas for improvement. 	<p>If 14/15 grades are delayed until March, schools will not be able to complete the required student achievement plan nor will IDOE be able to identify a new cohort of focus schools until March, not allowing for completion of required monitoring visits by years end.</p> <p>IDOE will submit an amendment to carry over the 14/15 focus schools that were determined based on 13/14 A-F grades & conduct monitoring and support based on that cohort of schools.</p>	<p>IDOE will submit an amendment to carry over the 14/15 focus schools that were determined based on 13/14 A-F grades & conduct monitoring based on that cohort of schools.</p>

<p><u>Targeted Schools</u></p> <ul style="list-style-type: none"> ESEA Waiver, Principle 2.F 	<ul style="list-style-type: none"> Targeted schools will be identified based on spring 2015 assessment data & reset AMO targets LEA & SEA monitoring of targeted schools will commence during Winter/Spring 2016 Targeted schools must update school improvement plans based on Spring 2015 Assessment data 	<p>This category has had delayed releases in the past, which resulted in confusion for schools that were identified.</p> <p>IDOE will submit an amendment to carry over the 14/15 targeted schools that were determined based on 13/14 A-F grades & conduct monitoring of targeted schools based on this list.</p>	<p>IDOE will submit an amendment to carry over the 14/15 targeted schools that were determined based on 13/14 A-F grades & conduct monitoring of targeted schools based on this list.</p>
<p><u>Assignment of Reward Schools</u></p> <ul style="list-style-type: none"> ESEA Waiver, Principle 2.C 	<ul style="list-style-type: none"> Highest-performing schools determined by whether a school receives at least 2 consecutive “As” and meets or exceeds the AMO for all subgroups High-progress elementary/middle schools & high schools determined by whether a school is in the 10% of Title I schools making the most progress in improving the performance of the “all students” group on the ISTEP+ over the previous 2 years, don’t have significant achievement gaps across all subgroups, and subgroup gaps are narrowing 	<p>Designations are based on the 14/15 A-F grades; delay in release of grades impacts ability to designate and recognize school performance</p> <p>IDOE will submit an amendment to carry over the 14/15 reward schools that were determined based on the 13/14 A-F grades.</p>	<p>No new reward schools would be designated for the 15/16 school year</p> <p>IDOE will submit an amendment to carry over the 14/15 reward schools that were determined based on the 13/14 A-F grades.</p>
<p><u>Title I Distinguished Schools Award</u></p> <ul style="list-style-type: none"> ESEA Waiver, Principle 2.F 	<ul style="list-style-type: none"> Distinguished schools must be identified based on whether the school earned an “A”, among other criteria Distinguished schools must be announced no later than December to be recognized at the national level 	<p>Distinguished schools will not be identified in time to be recognized at the national level</p> <p>IDOE will submit an amendment to not identify distinguished schools for the 15/16 school year</p>	<p>No new distinguished schools would be designated for the 15/16 school year</p> <p>IDOE will submit an amendment to not identify distinguished schools for the 15/16 school year</p>
<p><u>School Improvement Plans</u></p> <ul style="list-style-type: none"> IC 20-31-5 	<ul style="list-style-type: none"> Schools required to submit school improvement plans to the Department no later than June 30th for the upcoming school year 	<p>Schools will not meet statutory deadline to submit school improvement plans.</p> <p>Guidance from the IDOE has already been communicated to the field to utilize data points other than ISTEP/ECA to drive school improvement planning and moved submission date to March 1.</p>	<p>School will not meet statutory deadline to submit school improvement plans.</p> <p>Guidance from the IDOE has already been communicated to the field to utilize data points other than ISTEP/ECA to drive school improvement planning and moved submission date to March 1.</p>

<p><u>State Consequences</u></p> <ul style="list-style-type: none"> • IC 20-31-9 	<ul style="list-style-type: none"> • Upon receiving its first “F” a school shall issue a public notice of its lack of improvement; hold a public hearing; and revise the school’s improvement plan • Once a school receives its 4th “F” the SBOE shall assign an expert team to conduct a school quality review and recommend changes in the school to promote improvement • Once a school receives its 5th “F” the SBOE shall hold a public hearing to determine what intervention, if any, to implement at the turnaround academy • Once a school receives its 6th “F” the SBOE may impose additional interventions or sanctions. 	<p>The entire system of SBOE intervention will not be able to begin until after preliminary grade placement in January 2016.</p> <p>Thus, completion of 4th year “F” school quality reviews will not begin until that time and will be premised on an embargoed grade that is not yet final.</p> <p>Schools receiving 5th “F” would have public hearing options made available after January 2016 and will be premised on an embargoed grade that is not yet final.</p>	<p>School quality reviews would not be conducted & the IDOE could continue to provide technical assistance and school improvement support to schools in the 4th and 5th year “F” status for the duration of the 15-16 school year based upon the 14-15 A-F placement.</p> <p>There will be no advancement for any school within the state consequence sequence because no new grades would be issued for 14-15 school year.</p>
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