

RHODE ISLAND
Targeted Monitoring Review of
School Improvement Grants (SIG) under section 1003(g) of the
Elementary and Secondary Education Act of 1965
April 30 – May 3, 2012

11/30/12

BACKGROUND

Overview of SIG Schools in Rhode Island (Cohort 1)		
Tier	Number of Eligible SIG Schools	Number of Served SIG Schools
Tier I	6	1
Tier II	5	0
Tier III	32	0

Implementation of SIG School Intervention Models	
Models	Number of Schools implementing the Model
Turnaround	0
Transformation	1
Restart	0
Closure	0

Overview of SIG Schools in Rhode Island (Cohort 2)		
Tier	Number of Eligible SIG Schools	Number of Served SIG Schools
Tier I	6	4
Tier II	5	1 (merged with Tier I school)
Tier III	32	1 (merged with Tier I school)

Implementation of SIG School Intervention Models	
Models	Number of Schools implementing the Model
Turnaround	0
Transformation	4
Restart	0
Closure	0

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MONITORING TRIP INFORMATION

Monitoring Visits	
LEA Visited	<i>Providence Public Schools</i>
School Visited	<i>Young and Woods Elementary</i>
Model Implemented	<i>Transformation</i>
FY 2009 Funding Awarded	<i>LEA Award: \$3,972,909</i> <i>School-level funding: \$1,337,326 (first year)</i>
LEA Visited	<i>Central Falls Public Schools</i>
School Visited	<i>Central Falls High School</i>
Model Implemented	<i>Transformation</i>
FY 2009 Funding Awarded	<i>LEA Award: \$1,363,967</i> <i>School-level funding: \$1,343,160 (first year);</i> <i>\$1,363,967 (second year)</i>
SEA Visited	<i>Rhode Island Department of Education</i>
FY 2009 SIG Award	<i>\$12,509,424</i> <i>(\$1,921,317 – Regular; \$10,588,107- ARRA)</i>
FY 2010 SIG Award	<i>\$1,817,469</i>

Staff Interviewed	
<ul style="list-style-type: none"> ➤ <i>Rhode Island Department of Education Staff</i> ➤ <i>Providence Public Schools Staff</i> ➤ <i>Young and Woods Elementary Staff: Principal, School Leadership Team, Teachers, Parents, Students, and Classroom Visits</i> ➤ <i>Central Falls School District Staff</i> ➤ <i>Central Falls High School Staff: Principal, School Leadership Team, Teachers, Parents, Students, and Classroom Visits</i> 	

U.S. Department of Education Staff	
Team Leader	<i>Carlas McCauley</i>
Staff Onsite	<i>David Yi and Chuene Boston</i>

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OVERVIEW OF MONITORING REPORT

The following report is based on the U.S. Department of Education's (ED) onsite monitoring visit to Rhode Island from April 30 – May 3, 2012 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 any 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 that 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 offer 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.

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Observations

School Climate

Central Falls High School

The data from Central Falls' needs assessment reflect the behavior and attendance challenges that the school faced. In 2009-2010, the average daily attendance rate was 88.1% and the average truancy rate was 35.1%. In addition, students reported in surveys that: 31% felt teachers said discouraging things to them; 75% thought student disruptions limited the teachers' ability to teach; and 55% often spent class time working on worksheets. As a result, one of the school's reform goals was to improve the culture and climate of the school for students and teachers. To accomplish this goal, the leadership team set benchmarks and participated in follow-up surveys throughout the year to measure progress towards increasing satisfaction and to apply any necessary mid-course corrections. These surveys resulted in multiple changes to the original SIG plan.

In addition, Central Falls implemented a new behavioral management system and worked to increase parent and community participation. Central Falls started a Parent-Teacher-Student Organization and hosted a number of community forums. During interviews, parents reported that they are now engaged and are part of the decision-making process at the school. Parents also stated that conversations with teachers are now about instruction compared to previous years when conversations were fewer and almost always about discipline or attendance issues. The school has seen significant improvement in student behavior, which is documented by data.

However, in interviews teachers noted that the relationship with administrators has been strained due to the tumultuous start of the reform efforts. All the teachers were removed and then rehired. As stated in interviews, this was due to an inability of the union and administration to agree on the reform terms.

Overall, students and parents reported that the culture and climate at Central Falls has seemed to improve. During interviews, students agreed that things were more orderly and safer overall than in the previous school year. Students also noted that staff genuinely cares about their success and advancement.

Young and Woods Elementary School

Formerly two separate elementary schools housed in the same building, Young and Woods Elementary became one school in the 2010-11 school year as part of turnaround efforts under SIG.

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The needs assessment indicated that Young and Woods struggled to maintain a high level of parent engagement and community involvement at the school. Furthermore, the needs assessment stated the school consistently experienced a large number of non-violent and violent disruptions. Student and teachers agreed that student misbehavior depleted instructional time and the school regularly gave misbehaving students out-of-school suspension. During interviews, teachers and students indicated that the school had a negative reputation of having unruly behavior, disengaged students, and an environment that tolerated negative behaviors. Moreover, teachers stated that the school felt very chaotic.

To break this cycle, as part of their school reform plan, administrators and staff created a Behavior Management System and employed the Positive Behavioral Intervention and Supports (PBIS) framework. The new system allowed administrators to track and analyze student behavior trends through the use of the School-Wide Information System (SWIS). The SWIS is a web-based information system designed to help staff access and apply data when designing whole-school and individual student interventions. SWIS also allows teachers to be proactive in preventing disciplinary incidents, rather than responding to misbehavior. In addition, the school developed a system that implemented an in-school suspension program replacing many, if not all, out-of-school suspensions.

Young and Woods Elementary School also adopted the full-service community school (FSCS) model. A FSCS coordinates with community-based organizations, nonprofit organizations, and other public and private entities on the provision of comprehensive academic, social, and health services to students and their family members. The school offered play and learn teams for parents with students under four years of age and English as a second language (ESL) classes for the community. A parent handbook is also being developed to assist parents. Parents reported that conversations with teachers are now more about instruction compared to previous years when conversations were fewer but almost always about discipline or attendance issues. According to interviews, the climate within the school has changed dramatically. Young and Woods leadership team, students, teachers, and parents all agreed that the climate at the school was one of order and calm compared to previous years. Many attributed the positive change to the change in leadership and staff, and an informal reward system for students and administrators. During interviews, teachers noted that their conversations with each other, as well as teacher-leaders, had changed from questions about whether the teacher was doing what he or she was supposed to do to questions about whether students were successfully learning and what things were needed to improve instruction.

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Teachers and Leaders

There have been significant changes to staffing and organizational structures to support SIG and the reform efforts at both the school- and LEA-levels.

Central Falls High School

Central Falls High School moved to a co-principal model. There were a number of challenges implementing this new model. For example, the two original co-principals hired during the first year of implementation are no longer at the school, and Central Falls currently has identified only one principal to lead the school. The second principal is currently in the process of completing the principal training program. The leadership team is working to build an internal pool of administrative candidates. Both principals were recruited through the principals' residency network. This program has been in place in Rhode Island for a number of years. In addition, there was forty-five to fifty percent staff turnover between year one and two. Based on the evaluation of the needs of the school after the first two years of implementation, Central Falls High School also plans to hire a data specialist and has amended its application to hire a data specialist.

Central Falls School District

At the district level, two new positions, an Assistant Superintendent for High School Transformation and a Parent/community Liaison, were created. Both positions are based at the school.

Young and Woods Elementary School

A new principal was hired at Young and Woods Elementary School, during the 2010-11 school year and the assistant principal was hired for the 2011-12 school year. The new principal had experience successfully leading a school with similar demographics as Young and Woods. The principal stated that she did not have much flexibility in making hiring decisions during her first year because the district used a seniority-based system. However, the district switched to a criterion-based hiring process for staff beginning in the 2011-12 school year and seventy to eighty-five percent of the staff was replaced.

Providence Public Schools

At the district level, the Office of Transformation was developed to work with the persistently lowest achieving schools and aspects of the Race to the Top (RTT) initiatives. The following positions were created under the office: Transformation Coordinator (100% SIG-funded), Community Engagement Specialist (100%), Data Analyst (50%), Director of Career Technical

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Education (60%), and Director of Community Partnerships and Development (25%). A math and literacy coach was also hired.

Instructional Strategies and Time

Central Falls High School

Increasing the graduation rate/decreasing the drop-out rate was one of the priority goals set by Central Falls High School in its SIG application. According to the needs assessment, in 2008-2009, only forty-eight percent of the 9th grade cohort graduated within four years and the dropout rate for these students was thirty-three percent. Central Falls planned to address this goal by utilizing the LEA's new Multiple Pathways program which serves a mix of older, under-credited students who have already dropped out and those who are at-risk of dropping out in the near future. The program allowed students to take courses with a more mature cohort and complete the necessary coursework to receive a high school diploma. The school's administration and staff stated the Multiple Pathways program has been very successful in the first year of implementation. The school reported that a number of students who have previously dropped out are now re-engaged in school and that the individualized plans for struggling students have helped identify and implement targeted interventions.

Improving the percentage of students demonstrating proficiency in mathematics was another priority. The needs assessment showed that from 2007-2009 only three to seven percent of students scored at or above proficient scored proficient or advanced on the New England Common Assessment Program (NECAP) 11th grade mathematics exam while none of the students with Limited English Proficiency (LEP) or who had an Individualized Education Plan (IEP) achieved math proficiency in 2009. The school has struggled to make progress in this area. The administration reported extending the school day an hour and targeting some students for math intervention and a double block of math courses. However, the administration and teachers stated that the lack of a math curriculum aligned with state standards has made it difficult to improve math achievement. According to interviews, a large portion of the collaborative planning and professional development (PD) during the first and second years of implementation have focused on writing the math curriculum, creating benchmark and formative assessments, and aligning them to the state's standards. Staff reported that the math curriculum development has been very time-consuming and is still an ongoing process.

Young and Woods Elementary School

Improving English Language Arts (ELA) proficiency and increasing math engagement were two of the priority goals set by Young and Woods Elementary School in its SIG application.

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According to the needs assessment, over sixty-percent of students were scoring below proficient in the reading and math NECAP over the past three years. Nearly half of the students at the school have an IEP and/or are ELL students. Of these students, more than seventy-percent scored below proficient in reading and over sixty-five percent scored below proficient in math over the past three years.

In order to address the need of improving ELA proficiency, Young and Woods Elementary School adopted a new curriculum. It also provided tools to teachers to facilitate differentiated instruction by emphasizing ongoing progress-monitoring. Additionally, Young and Woods elementary school increased the 150-minute reading block by 30 minutes to establish a new 180-minute reading block to provide more strategic intervention. The 180-minute literacy block was meant to give students a heavy, uninterrupted dose of literacy instruction. Young and Woods hired two Literacy Specialists to oversee and monitor effective implementation of the reading curriculum.

To address the need of improving math proficiency, Young and Woods Elementary School implemented the Providence School District's new District Curriculum Framework and math curriculum as a key part of their strategy. The school provides extensive professional development on how to implement the curriculum and use the math resources during the school year. The school also hired a Math Specialist to serve as a mentor to teachers, conduct walkthroughs, support struggling teachers, plan math-related professional development, and analyze math data on formative assessments.

Young and Woods's teachers and administrators expressed very positive reactions to the changes in the literacy and math curriculum, restructured schedule for literacy and math blocks, and the Literacy and Math Specialists. Teachers stated that the transition to a uniform, written reading and math curriculum has helped them plan and collaborate more easily because all teachers in the grade are now teaching the same concepts at the same time to their students. This has allowed teachers to fully integrate differentiated grouping into their instruction. All students in Young and Woods Elementary School are placed in flexible, differentiated reading and math groups. During the math and reading blocks, all teachers in the same grade collaborate and work with a specific differentiated group. The school calls this program "Walk to Read/Math" because students walk to other classrooms to meet with their reading/math teacher based on their differentiated group. Students' progress is tracked and there are opportunities to move to different groups based on the trends in the students' performance and data.

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Teachers and faculty report that the increased learning time in the reading and math blocks has been very helpful and they have seen tremendous growth in students' proficiency as a result of the additional time. Many teachers cited that the increased learning time has especially been useful to provide additional small group intervention support to the students experiencing difficulty in math and reading classes. The restructured schedule has been established in an effort to ensure that all teachers in the same grade-level are given the same planning time and same lunch period. Teachers reported that this has allowed them to collaborate on lesson planning and analyzing student data. Teachers also have stated that the Literacy and Math Specialists have been a great asset to the school. Teachers stated the specialists provided feedback and helped teachers focus on improving instruction. Additionally, specialists provide a lot of support in the data analysis of students' performance on formative assessments. Specialists work with teachers to strategically think about where students should be placed in differentiated groups and what targeted interventions would best address students' needs. Teachers reported that the professional development at Young and Woods elementary school is focused on instruction, data analysis, and teacher collaboration. Moreover, the professional development is embedded within the school day and teachers remarked that they find it very relevant and practical. School administration expressed spending a lot of time planning all professional development opportunities to ensure that it is structured within the school day and that the topics addressed are aligned with the school's overall goals for improvement.

Use of Data

Central Falls High School

The needs assessment and application did not specifically address Central Falls' use of data prior to the implementation of the SIG intervention model. However, the school's administration and staff expressed during interviews that data on student achievement was not widely collected or analyzed prior to the implementation of the transformation model and is not widely used on a school-wide level.

Central Falls has collected extensive school-level data such as discipline incidents, suspensions, and student achievement on state assessments. However, based on interviews it was not clear if this data is shared with teachers on a regular basis. Furthermore, based on interviews there was not any professional development opportunities or systems created to support teachers to collect and use student achievement data to guide instruction. Central Falls plans to add a data specialist position for the next school year to support teachers with data usage.

Young and Woods Elementary School

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Young and Woods' needs assessment and application also did not address the school's use of data prior to SIG implementation. However, as in Central Falls, administration and staff stated that data was minimally used on a regular basis at the school-level.

Young and Woods's SIG application emphasized the importance of regularly collecting and analyzing student data in order to improve the overall instruction of teachers and academic proficiency of students. The application stated that Young and Woods planned to use the CARA (Collect, Analyze, Reflect, Act) model for all decision-making. In doing so, Young and Woods planned to create a data-driven culture amongst faculty and staff that emphasizes using data to collaboratively create plans to address every student's academic needs. The school incorporated data analysis into weekly common planning sessions to use data to drive instructional improvements. In addition, the school has quarterly ACT (Administrator, Coach, and Teacher) meetings with each teacher to discuss student data and progress.

During interviews with the teachers and school's administration, it was expressed that data collection and analysis has now become an integral part of the school. Both groups stated that data is now used to make informed decisions on instruction, differentiated grouping, student and teacher interventions, and professional development for teachers. Each grade level teacher is part of an instructional leadership team that looks at data to determine school, grade, and classroom-level needs. Teachers participate in a cycle of continuous action planning to collaborate and target areas of weakness. Both Literacy and Math Specialists produce extensive support in collecting student achievement data. Data is used to form flexible, differentiated groups for math and reading instruction. Student achievement data is on a shared drive for all teachers in the school to access.

Central Falls School Department of Education

The district superintendent on-site works to provide the school with timely and comprehensive data. The data is provided to the school on a regular basis, but the LEA hopes to provide more targeted support for school-level data analysis during the upcoming school year.

Providence Department of Education (PDE)

The LEA officer has helped produce more data support for SIG schools especially for middle and high schools. The PDE also ensures that its SIG schools provide data on all the leading indicators and also provide Young and Woods with data when the school requests it.

Technical Assistance

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Central Falls School Department of Education

At Central Falls, the LEA has provided specific accounting and budget support to the school regarding SIG budgets and how they work with the overall school and district budget processes. The fiscal office also gives priority to purchase orders for needed SIG materials or supplies. In addition, intensive technical assistance is being provided by the Deputy Assistant Superintendent and Parent and Community Liaison, both of whom are housed at the school. The Superintendent also visits the school approximately every three days.

Providence Department of Education (PDE)

The LEA provides outside consultants for professional development for Teach Scape and Reading Street. In addition to providing principal training, consultants meet with school leads once a month. Providence also differentiates the professional development hours by need. The LEA has allowed some SIG schools to opt out of the LEA-hosted professional development training and use that time for professional development outlined by the school because it is more tailored to the schools' needs. The PDE also convenes principals twice a month to participate in principal labs and receive training – including time to collaborate. LEA staff has not spent much time in the schools. Moving forward, the LEA staff plan to focus on the school-level technical assistance and focus on being in schools.

RIDE

The Rhode Island Department of Education (RIDE) has a systemic approach to school turnaround. According to RIDE's SIG application, "The Strategic Plan for Transforming Education in Rhode Island" (The Strategic Plan), "The Basic Education Program Regulations" (BEP), and "The Protocol for Interventions: Persistently Lowest-Achieving Schools" (The Protocol) are the foundation documents that RIDE will utilize to support LEAs in the process of applying for and effectively utilizing SIG Funds.

On January 7th 2010, the Rhode Island Board of Regents approved The Strategic Plan which aligns RIDE's school improvement efforts with ED's focus for reform and schools identified through the SIG program. As such, each LEA that is awarded SIG funds will undertake work in its Tier I and Tier II schools that is highly focused and intensive.., Approved by the Board of Regents on June 4, 2009 and in effect since July 1, 2010, the BEP is aligned with the intent and purposes of the 1003(g) School Improvement Grants. It requires schools identified as being persistently lowest-achieving to implement the components of one of the SIG models regardless of if a school receives SIG funds. RIDE also issued The Protocol which provides guidelines to the LEAs responsible for the implementation of one of the four SIG models in their persistently lowest-achieving schools. The Protocol places the responsibility upon the LEAs to hold their

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schools accountable for continuous improvement of instructional and support systems that advance equity and access to opportunities for students' high achievement.

In their application, the RIDE described a framework for technical assistance to the LEAs. The RIDE Office of Transformation will have primary responsibility for the administration of all programs for LEAs with persistently low-achieving schools. The following positions were created: Director of the Academy for Transformative Leadership, Transformation Specialist, and School Achievement Specialist. The Transformation Office will coordinate the work of staff from other offices within the RIDE to support the implementation of school reform initiatives, and will lead the collection and review of performance metrics and progress towards milestones and goals. As needed, the RIDE will contract with outside consultants and organizations with content area expertise and a national track-record of success to design and deliver technical assistance to LEAs with persistently low-achieving schools. On a quarterly basis, the RIDE staff will evaluate an LEA's fidelity to project implementation and student progress based on the timeline of activities submitted as part of an LEA's application. Results of this quarterly review will guide the provision of technical assistance and support to LEAs, received through RIDE staff or contracts with outside consultants. Additionally, the RIDE proposes to hire an outside evaluator to assess the state and district level processes, policies, and activities related to school reform.

In interviews, LEA staff reported receiving feedback and technical assistance from the RIDE which was very helpful in completing the LEA application. The support included webinars on the SIG rules and regulations, the State's application process and timeline and budget preparation. Staff also indicated having direct access to RIDE staff and found staff very helpful in answering all questions. Staff reported that the RIDE held webinars, phone conferences, and created a SIG handbook as part of its technical assistance. The RIDE staff meets with LEAs regularly to discuss technical assistance needs. During interviews, the RIDE staff stated that it is trying to develop a culture that the LEAs can come to the SEA to ask any questions about implementation through the ongoing and systemic support it has provided to the LEAs and schools.. The RIDE also collects all of the required data indicators for the SIG program. It is unclear how often this data is used as part of the monitoring of LEAs and SIG schools.

In terms of technical assistance that SEAs are providing to their respective schools, school leadership and district staff reported that the SIG coordinator has a strong understanding of the needs of each SIG program. However, staff reported that the SIG coordinator's role is to work through the LEAs instead of providing direct technical assistance at the school-level.

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TECHNICAL ASSISTANCE RECOMMENDATION

This section addresses areas where additional technical assistance may be needed to improve the quality of implementation of the SIG program.

Issue:

Issue 1: Based on interviews with Central Falls district and school staff, some LEAs would benefit from more support in helping schools align curriculum to the state standards.

Technical Assistance Strategies:

- Provide technical assistance to LEAs around benchmarking and curriculum mapping so that schools can better assess whether the curriculum being used is aligned with state standards.
(Responsibility: RIDE)

Issue 2: Based on interviews with Central Falls High School administration and staff, some SIG schools would benefit from more support in how to collect, analyze, and use student achievement and leading indicator data to inform instruction and school reform strategies.

Technical Assistance Strategies:

- To build the capacity of SIG schools in collecting, analyzing, and using data, work with LEAs to provide technical assistance such as offering professional development, training staff, and connecting struggling schools with schools that effectively use data.
(Responsibility: RIDE)

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	16
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 Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	16
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 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]	N/A	N/A
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 Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	N/A
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 Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	17
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))]	N/A	N/A

Monitoring Area: School Improvement Grant

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

Finding: For its cohort I competition, the RIDE did not notify LEAs with Tier II schools that they were eligible to apply for SIG funds and limited the competition to only Tier I schools.

Citation: Section II.A.1 and II.B.7 of the final requirements for the SIG program state that “An LEA may apply for a School Improvement Grant if it receives Title I, Part A funds and has one or more schools that qualify under the State’s definition of a Tier I, Tier II, or Tier III school.... An SEA must award funds to serve each Tier I and Tier II school that its LEAs commit to serve, and that the SEA determines its LEAs have the capacity to serve...” (75 FR 66363 (October 28, 2010))

Further action required:

The SEA must ensure that its cohort II application process has been carried out consistent with the final requirements of the SIG program. RIDE must provide ED with documentation demonstrating that its competition was open to all eligible schools and provide to ED evidence that it administered its competition consistent with its approved FY 2010 SIG application.

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

Finding (1): The SEA has not ensured that schools implementing the transformation model are using teacher and principal evaluation systems that take into account data on student growth as a significant factor.

Citation: Section I.A.2(d)(1)(i)(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 use of a rigorous, transparent, and equitable evaluation systems for teachers and principals that— (1) Take into account data on student growth as a significant factor as well as other factors such as multiple observation-based assessments of performance and ongoing collections of professional practice reflective of student achievement and increased high school graduations rates; and (2) Are designed and developed with teacher and principal involvement;

Further action required:

The SEA must submit to ED a support plan that outlines how the SEA will provide technical assistance to LEAs in order to help them meet the evaluation system requirements. Additionally, the SEA must submit to ED a timeline for implementation of these evaluation systems for any school currently not doing so. For each school implementing the transformation model, the SEA must submit to ED documentation demonstrating a teacher and principal evaluation system aligned to the final requirements of the SIG program is being implemented in the 2012-2013 school year.

Finding (2): The SEA has not ensured that the system of rewards for school leaders, teachers, and other staff implementing the transformation model is based in part on student achievement. The current staff evaluation process is not clearly linked to student performance.

Citation: Section I.A.2. (d)(1)(i)(c) of the SIG final requirements states that an LEA implementing a transformation model must identify and reward school leaders, teachers, and other staff who, in implementing this model, have increased student achievement and high school graduation rates and identify and remove those who, after ample opportunities have been provided for them to improve their professional practice, have not done so.

Further action required: The SEA must provide a plan to ED for how it will assist LEAs in developing and implementing a system that identifies and reward school leaders, teachers, and other staff who, in implementing the transformation model, have increased student achievement and high school graduation rates. The plan must include a timeline for implementation in the 2012-2013 school year, to identify and reward school leaders, teachers, and other staff who, in implementing the transformation model, have increased student achievement.

Critical Element 3: Monitoring

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

Finding: The SEA has not ensured that monitoring of SIG implementation in LEAs and schools is being conducted as outlined in its approved application. According to RIDE's application, "team members from the Office of Transformation, in conjunction with other relevant offices in RIDE, will coordinate periodic visits to these schools. Visits will be comprised of instructional observation, artifact examination, focus group discussions and checklists for progress monitoring on the objectives outlined in SRPs." RIDE has not conducted on the ground monitoring or developed a monitoring protocol.

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 SEA must submit to ED a description of how it will carry out its monitoring plan as described in the approved SEA application. As a part of the plan submitted the SEA must include a timeline, monitoring protocol and a copy of the process it will use to ensure that LEAs correct any areas of non-compliance identified in any future monitoring efforts of SIG recipients.