



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

RICK SNYDER  
GOVERNOR

MICHAEL P. FLANAGAN  
SUPERINTENDENT OF  
PUBLIC INSTRUCTION

August 5, 2011

Dr. Thelma Meléndez de Santa Ana  
Assistant Secretary for Elementary and Secondary Education  
Office of Secondary and Elementary Education  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, D.C. 20202

RE: Michigan Department of Education (MDE) Request to Waive the Requirements  
for Replacing Principals in Persistently Low Achieving Schools as Detailed in  
75 FR 66366

Dear Dr. Meléndez:

I am writing to request a waiver of the requirement to replace the principal in Persistently Lowest Achieving (PLA) Schools that choose a Turnaround or Transformation model as defined in the final requirements for School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act (ESEA). Specifically, I am requesting that Michigan be allowed to delay the replacement of the principal on two conditions in the aforementioned intervention models as detailed in Volume 75, Number 208, page 66366 of the Federal Register.

First, the LEA must present evidence and substantiate its case to the MDE that the principal has begun to make progress towards raising student achievement outcomes. The LEA must also present evidence that the principal has the background, skills, and competencies necessary to significantly turn the school around (specific criteria is included in attachment E). Second, the LEA would have a period of no more than two years from the time of appearing on the persistently lowest achieving list to demonstrate that the school is substantially improving student achievement outcomes.

Michigan believes this waiver request is necessary for two reasons: Several LEAs have hired a principal who has begun to turn the school around but the hire date of

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the principal falls outside of the flexibility already given under section G-1a, b, and c of the "Guidance on Fiscal Year 2010 School Improvement Grants Under Section 1003(g) of the Elementary and Secondary Education Act of 1965." Consequently, Michigan has several LEAs that have hired principals that are improving outcomes for students in a significant way. A change in leadership could change that momentum.

Secondly, LEAs have shared with the MDE that the pool of principals who possess the experience and skills needed to successfully implement a transformation or turnaround model, especially in some areas of our state, is limited. Providing this additional flexibility allows principals who are improving student learning to continue on the path of turning the school around.

Consequently, Michigan proposes that replacing the principal be delayed for up to two years from the time the school is identified as PLA, rather than immediate removal as is currently required. Because the MDE's criteria to allow this flexibility are rigorous, it is anticipated that only a small number of schools would be approved. During the proposed two year time frame, the school would be closely monitored for progress and evidence that achievement has increased under the principal's continued leadership. In this scenario, the LEA may make a request to the state to keep the principal, providing significant progress has been made at the school. In the event significant progress is not made, the principal would be replaced in accordance with the current requirements.

The intended consequences are to provide a small number of LEAs with additional flexibility to significantly increase student achievement. The MDE will closely monitor the progress of the schools that take advantage of the additional flexibility. This additional flexibility is not intended to protect the job of any principal. It is intended to allow the LEA to continue on its path of turning around a low-achieving school.

If granted the requested waiver, Michigan will implement the waiver with respect to the following assurances that:

- o It will comply with all of its other Title I, Part A statutory and regulatory obligations in Section 1003(g) to ensure that funds are utilized to serve the lowest-achieving schools in accordance with their eligibility for and designation as a PLA school.
- o It will comply with the final requirements detailed in 75 FR 66363-66371, with the exception of the anticipated waived requirements.
- o It will comply with February 23, 2011 Guidance on Fiscal Year 2010 School Improvement Grants under Section 1003(g) of the Elementary and Secondary Education Act of 1965, with the exception of the anticipated waived requirements.

Prior to submitting this waiver request, Michigan provided all LEAs in the state with notice and a reasonable opportunity to comment on this request. Michigan

Dr. Thelma Melendez de Santa Ana

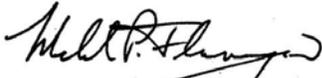
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provided such notice by sending a communication to each LEA on August 5, 2011 (Attachment A). Copies of all comments that Michigan receives from LEAs in response to this notice will be forwarded (Attachment B). Michigan has also provided notice and information regarding this waiver request to the public in the manner in which the state customarily provides such notice and information to the public, which is by posting information regarding the waiver request on its website (Attachment C). Copies of all public comments that Michigan receives in response to this notice will also be forwarded at the close of the comment period (Attachment D).

Please feel free to contact Dr. Sally Vaughn, Deputy Superintendent/Chief Academic Officer by phone, 517-335-0011, or e-mail, [vaughns1@michigan.gov](mailto:vaughns1@michigan.gov), if you have any questions regarding this request. Thank you for your consideration.

Sincerely,



Michael P. Flanagan  
Superintendent of Public Instruction



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING

RICK SNYDER  
GOVERNOR

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PUBLIC INSTRUCTION

August 5, 2011

**MEMORANDUM**

TO: Local and Intermediate School District Superintendents  
Public School Academy Directors

FROM: Sally Vaughn, Ph.D. *Sally*  
Deputy Superintendent/Chief Academic Officer

SUBJECT: Section 1003(g) School Improvement Grants Waiver Request

The Michigan Department of Education (MDE) is requesting a U.S. Department of Education (USED) waiver of certain requirements in the final requirements for the American Recovery and Reinvestment Act (ARRA) Section 1003(g) School Improvement Grants.

The waiver will permit a two year delay in the replacement of the principal in schools that choose the turnaround or transformation model provided that the school has made progress towards raising student achievement outcomes in the previous school year. If the school shows progress in the next two years and an increase in achievement over the two year period, the principal may remain at the school. If the school continues to show little or no progress the principal must be replaced.

The end result is that current leadership is afforded the opportunity to remain in place and guide the school through its improvement efforts.

The waiver request may be accessed online at [www.michigan.gov/osi](http://www.michigan.gov/osi) under "Current Topics."

LEAs wishing to comment on the request should submit comments to [ARRAWaiverResponse@michigan.gov](mailto:ARRAWaiverResponse@michigan.gov) by August 19, 2011.

cc: Michigan Education Alliance

## LEA Comments

Public Notification for Website

The Michigan Department of Education (MDE) is requesting a U.S. Department of Education (USED) waiver of certain requirements in the final requirements for the American Recovery and Reinvestment Act (ARRA) Section 1003(g) School Improvement Grants.

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The end result is that current leadership is afforded the opportunity to remain in place and guide the school through its improvement efforts.

The waiver request may be accessed online at [www.michigan.gov/osi](http://www.michigan.gov/osi) under "Current Topics."

Individuals wishing to comment on the request should submit comments to [ARRAWaiverResponse@michigan.gov](mailto:ARRAWaiverResponse@michigan.gov) by August 19, 2011.

## Public Comments

## Principal Criteria

If granted this waiver, Michigan will use these specific criteria to determine if progress has been made. Michigan will use the state assessments (Michigan Educational Assessment Program, Michigan Merit Exam, and MI-Access) as one measure of determining progress. In addition to achievement data in reading, mathematics, science, social studies, and writing, the leading indicators for success, such as, growth data, achievement gap data, graduation rate data (for high schools), teacher attendance, student attendance, student dropout rate, student participation rate on State assessments, and discipline incidents, truancy rates, and distribution of teachers by performance level on an LEA's teacher evaluation system will also be included as measures of progress. In order for the LEA to make a formal appeal to the MDE, the school must have made some progress in the previous year on the State's assessments and leading indicators of success.

The LEA must demonstrate to the MDE that the principal possess the following.

## Background

- Prior experience (successful experience leading a school)
- Preparation / source (e.g., traditional v. alt routes)
- Degrees / certification (administrator certificate)

## Skills and Knowledge

- Instructional knowledge and leadership
- Operational leadership
- Resource management

## Competencies

- Driving for results
- Influencing for results
- Problem solving
- Showing confidence to lead

## Critical Beliefs

There are a number of critical beliefs which underlie a principal's effectiveness in leading the process of improving student achievement. The principal must believe in, value, and be committed to:

- Student learning as the fundamental purpose of schooling
- The proposition that all students can achieve high standards of learning
- Collaborative problem solving with staff and stakeholders
- Ongoing collection and analysis of data
- Data-driven decision making
- Lifelong learning for self and others
- Focus and alignment to achieve goals
- Doing the work required for high levels of personal and organization performance

## Year One Criteria

If granted this waiver and if the LEA is able to demonstrate to the MDE that the principal possess the criteria in the above section, the MDE will have the following criteria for year one.

The school must have made a gain of at least 5% on the State's assessments. The school must have implemented, with fidelity, their school improvement plan and all of the elements of the selected reform model. The MDE will monitor the school to ensure the school improvement plan and the reform model is implemented with fidelity. The MDE will also monitor the leading indicators of success that have been previously mentioned.

## Year Two Criteria

The school must have made a gain of at least 10% on the State's assessments. The school must continue to implement, with fidelity, their school improvement plan and all of the elements of the selected reform model. The MDE will monitor the school to ensure the school improvement plan and the reform model is implemented with fidelity. The MDE will also monitor the leading indicators of success that have been previously mentioned. The school must increase student outcomes as measured by the leading outcomes.