



STATE OF MICHIGAN  
DEPARTMENT OF EDUCATION  
LANSING



JENNIFER M. GRANHOLM  
GOVERNOR

THOMAS D. WATKINS, JR.  
SUPERINTENDENT OF  
PUBLIC INSTRUCTION

April 26, 2004

**MEMORANDUM**

**TO:** State Board of Education

**FROM:** Thomas D. Watkins, Jr., *Chairman*  
*Tom Watkins*

**SUBJECT:** Presentation on CCSSO-MGT of America, Inc. Diagnostic Report of MDE

In January 2004, the Michigan Department of Education using private non-government resources contracted with the Council of Chief State School Officers (CCSSO) and MGT of America, Inc., in collaboration with the Michigan Business Leaders for Excellence in Education (MBLEE), to conduct an organizational, operations, and resource assessment related to maximizing the implementation of No Child Left Behind (NCLB).

The Department voluntarily undertook this outside review as part of our continuous quality improvement process. We knew going into this outside review generally where our strengths and weaknesses were organizationally. This report systematically pinpoints areas like the thrust of NCLB itself where we are in "need of improvement."

This final report clearly identifies agency strengths and improvement opportunities for Michigan as we implement NCLB. It is organized into four sections: (1) the introduction that includes an overview of the review methodology; (2) a summary of the agency strengths and improvement opportunities; (3) a thorough discussion of the findings, commendations and recommendations for the 18 components reviewed in the process; and (4) the summary and conclusions.

The Department's early actions, including adoption of academic standards, a statewide assessment at three levels, focus on high quality of teachers, offering of public school choice, and a developing accountability structure, placed the state in an advanced stage of readiness for the NCLB requirements. These prior actions led Michigan to an effective transition in meeting many of the NCLB requirements.

The greatest opportunities for improvement center on the current de-centralized functions of the academic data management and reporting system, and the lack of a single formal strategic planning document for NCLB. The current plans from various offices would be strengthened with a single

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comprehensive strategic document. As you are aware, the State Board of Education and key Department of Education staff will be meeting May 18-19 to further refine our strategic goals into a single strategic plan to help steer the organization and guide our actions into the future.

Dr. Linda Recio, Senior Partner of MGT of America, Inc. and Dr. Lois Adams-Rodgers of CCSSO, will present an overview of the process and findings. This report is solely focused on the Department's organizational efforts to maximize the implementation of the most far reaching federal law impacting on public education in nearly a quarter century—NCLB. Given the magnitude of this challenge, one could lose sight of the other major goals, objectives, programs, and services the Department of Education has the responsibility to carry out, which are many.

I want to emphasize and magnify the recognition CCSSO and MGT of America, Inc., have given to our entire staff for their hard work, focus, persistence, and determination to make this law work for Michigan's children. We have much work to do, yet we already have accomplished much for our children because of the great efforts of all of our staff.



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April 19, 2004

Mrs. Kathleen N. Straus  
President  
Michigan State Board of Education  
608 West Allegan Street, 4<sup>th</sup> Floor  
Lansing, MI 48933

Dear Mrs. Straus:

On behalf of CCSSO and MGT America, we want to thank you and your fellow Board members for inviting us to be partners with you in conducting the Diagnostic Review for the Michigan Department of Education in January. Our team certainly enjoyed being in Lansing, getting to know the incredible staff in the Michigan Department of Education, and appreciated their continued assistance as we conducted the Review, and as we finalized this report.

We would also like to commend the State Board of Education for their visionary leadership in embracing the moral imperative of the federal No Child Left Behind Act. Because of the State Board's recognition of the value of the new federal law on achievement, and integrating those provisions with Michigan's own state accountability system, Michigan's children will be the beneficiaries by reaching new achievement heights. We would also like to commend the State Board of Education and the state Superintendent for your inclusion of thousands of school administrators, teachers, parents, and business leaders in the development of your NCLB accountability system. This system affects every community in the state and needs the broad input of everyone who is affected. You have made those opportunities available to them.

We also must recognize the Michigan Department of Education, from the state Superintendent to the dedicated frontline employees, and the many education stakeholders who have worked diligently to create a NCLB implementation system that best meets the needs of every student and school in Michigan. Even with the \$3 billion structural deficit in the state's budget, and the distribution of many vital elements of the state education agency across state government (statewide assessment and school data collection), you have maintained a focus on NCLB accountability for results. Persistent downsizing over the past several years, which effectively reduced the education department from over 2,000 employees to just over 300, has not deterred the state board and MDE from their commitment and focus on what is best for Michigan's students.

At a time when many states in the nation are considering whether they want to participate in NCLB, Michigan has consistently supported the federal law's goals and has worked hard to comply with the construct and letter of the law. At the same time, you have advocated for

modifications in implementation, such as flexibility for English language learners and the definition of highly qualified teachers. You are all to be commended for keeping your focus on what is best for your state's students.

We draw your attention to the commendations and recommendations in this Diagnostic Review of the Michigan Department of Education, and know that as you continue to work with the MDE on creating a strategic plan to implement the vision of the Michigan State Board of Education you will determine which of these recommendations can best assist you with this important task.

Thank you again for your vision and commitment to our youth.

Sincerely,



G. THOMAS HOULIHAN  
Executive Director  
CCSSO



LINDA RECIO  
Senior Partner  
MGT of America, Inc.

cc: Thomas D. Watkins Jr, Superintendent of Public Instruction

# Maximizing Implementation of *No Child Left Behind*

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## ***DIAGNOSTIC REPORT***

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Prepared for:



Prepared by:



and



April 23, 2004

# TABLE OF CONTENTS

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	<b>PAGE</b>
SECTION 1 – INTRODUCTION .....	1-1
1.1 Review Methodology .....	1-1
1.2 Overview of Diagnostic Report .....	1-3
SECTION 2 – AGENCY STRENGTHS AND IMPROVEMENT OPPORTUNITIES .....	2-1
2.1 Agency Strengths .....	2-1
2.2 Agency Improvement Opportunities .....	2-2
SECTION 3 – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS .....	3-1
Component 1 Challenging Academic Standards .....	3-2
Component 2 Accountability and Adequate Yearly Progress (AYP) .....	3-10
Component 3 Reporting .....	3-19
Component 4 Low-Performing Schools .....	3-24
Component 5 School Support and Recognition .....	3-26
Component 6 Student Assessment .....	3-29
Component 7 Teacher Qualifications .....	3-37
Component 8 Paraprofessional Qualifications .....	3-42
Component 9 Reading First/Early Reading First Programs .....	3-45
Component 10 Transferability .....	3-50
Component 11 Data Management .....	3-52
Component 12 Public School Choice .....	3-59
Component 13 Professional Development .....	3-63
Component 14 Students with Disabilities and Limited English Proficient (LEP) ..	3-67
Component 15 Supplemental Educational Services .....	3-70
Component 16 Education Technology .....	3-75
Component 17 Student Safety and Health .....	3-78
Component 18 Overall Organization of the State Education Agency (SEA) .....	3-80
SECTION 4 – SUMMARY AND CONCLUSIONS .....	4-1
APPENDIX: SURVEY RESULTS	

## ***SECTION 1 – INTRODUCTION***

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## **SECTION 1 – INTRODUCTION**

In January 2004, the Michigan Department of Education (MDE) contracted with the Council of Chief State School Officers and MGT of America, Inc., to conduct An Organizational, Operational, and Resource Assessment Related to Maximizing Implementation of No Child Left Behind. The project addressed Michigan's *No Child Left Behind* (NCLB) implementation process and activities, and was designed to identify agency strengths and improvement opportunities in responding to this federal legislation. In addition, the project sought to produce recommendations to support the effective implementation of NCLB requirements.

To meet the needs of the MDE in this area, a review process was initiated to collect, analyze, and synthesize MDE data regarding NCLB-related policies and practices. Data were gathered through personnel interviews with agency employees and other relevant staff, and documentation analyses from the state and program levels. This process led to a comprehensive understanding of the issues surrounding the implementation of NCLB in Michigan as well as of the processes currently in place to manage NCLB implementation.

Each component of the overall process was designed to result in specific outcomes for the Michigan Department of Education. The first phase of the project produced this Diagnostic Report that describes in detail the state's existing readiness to meet federal requirements as well as recommendations for maximizing the benefits of NCLB implementation. In the second phase of the project, the NCLB strategic planning session will assist Michigan officials to use its expanded understanding of the issues and current status of implementation to effectively comply with, and gain full benefit from, the federal law. Moreover, Phase II will facilitate MDE's use of the results into its overall strategic planning initiatives.

Exhibit 1-1 shows an overview of the timeline for project activities.

### **1.1 Review Methodology**

The methodology CCSSO/MGT used to prepare for and conduct the assessment is described in this section. Our methodology primarily involved a focused use of indicators and rubrics following the analysis of both existing data and new information obtained through various means of employee input. Each strategy we used is described below.

#### ***Existing Reports and Data Sources***

During the period between project initiation and beginning our on-site review, we simultaneously conducted many activities. Among these activities were the identification and collection of existing reports and data sources that provided us with available recent information related to the various functions and operations associated with NCLB implementation.

**EXHIBIT 1-1  
TIMELINE FOR THE CCSSO/MGT STUDY**

<b>TIME FRAME</b>	<b>ACTIVITY</b>
December 2004	Finalized contract.  Tailored review guidelines and trained team members using information available on the MDE Web site.  Designed on-line self-assessment for MDE senior staff.  Made on-line assessment available to MDE staff.
January 20-23, 2004	Conducted on-site diagnostic review: <ul style="list-style-type: none"> <li>■ Collected data.</li> <li>■ Interviewed staff and related stakeholders.</li> </ul>
January – February 2004	Analyzed data and information which were collected.  Requested additional data from the MDE and analyzed data.
February – March 2004	Prepared Draft Diagnostic Report.
March 5, 2004	Submitted Draft Diagnostic Report.
March 30 – April 8, 2004	Made changes to the Draft Report.
April 23, 2004	Submitted Final Diagnostic Report.
May 11, 2004	Presented Final Report.
May 18-19, 2004	Participated in Strategic Planning Session.

Examples of materials requested include, but are not limited, to the following:

- Michigan's Accountability Plan;
- additional state accountability initiatives;
- assessment data;
- state content standards;
- organizational structure;

- NCLB budget information;
- professional development information;
- teacher training, evaluation, and certification data; and
- individual functional area plans for implementing the requirements of NCLB.

### ***Self-Assessment Survey***

To secure the input of Michigan Department of Education managers, the *State Education Agency Self-Assessment On Implementing The No Child Left Behind Act* was disseminated to MDE senior staff. The information resulting from this survey was used to focus the assessment and is cited throughout this report. Summarized survey results are provided in the Appendix.

### ***Conducting the On-Site Diagnostic Review***

During the week of January 20 – 23, 2004, the CCSSO/MGT team conducted the on-site diagnostic review. As part of our on-site review, we examined implementation of 18 components of the *No Child Left Behind Act* using a set of quality indicators and rubrics. Our on-site review included meetings with appropriate stakeholders, and analyses of documentation provided by these individuals.

## **1.2 Overview of Diagnostic Report**

The Diagnostic Report is organized into four major sections:

Section 1 – Introduction

Section 2 – Agency Strengths and Improvement Opportunities

Section 3 – Findings, Commendations, and Recommendations

Section 4 – Summary and Conclusions

Appendix

**SECTION 2 – AGENCY STRENGTHS  
AND IMPROVEMENT  
OPPORTUNITIES**

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## **SECTION 2 – AGENCY STRENGTHS AND IMPROVEMENT OPPORTUNITIES**

This section outlines key strengths that serve as support for the NCLB implementation process, and improvement opportunities that, if not implemented, may hinder overall implementation success within the Michigan Department of Education (MDE). Major issues are summarized so that the reader can gain an initial understanding of overall conditions impacting the implementation of NCLB in Michigan. However, there are numerous circumstances currently affecting the implementation of the federal requirements under NCLB in the state. With this in mind, the following summary must only serve as an initial discussion of NCLB issues in the state and should be followed by a complete review of all information contained in this report.

As the requirements of NCLB are far-reaching and impact essentially every critical function of a state education agency, it is appropriate that the practices and processes related to its implementation in Michigan are evolving at this point. Some of the final regulations under NCLB have only recently been clarified, and various implementation strategies are currently being negotiated between individual states and the U.S. Department of Education. Thus, it is important to filter any discussion of NCLB implementation in this light to ensure an accurate assessment of Michigan's efforts to date.

### **2.1 Agency Strengths**

The Michigan Department of Education has undergone significant changes in recent years. The agency currently consists of approximately 394 full-time employees, down from about 625 authorized positions five years ago. The highest number of employees was 2,622 in 1980, but since then some units have move to other state agencies and many positions were cut. Realignments in organizational structure and staffing have left MDE with limited resources and, often, redefined job descriptions. In spite of these challenges, MDE staff have responded positively to the additional challenges brought about by the implementation of NCLB. The agency displays a commitment to implementing the requirements of NCLB and improving student achievement in Michigan.

In the midst of reductions in staffing and funding, Michigan was one of the few states that significantly implemented the federal requirements under the previous *Improving America's Schools Act*. These actions placed Michigan in an advanced state of readiness for the requirements of NCLB, but also placed many of the state's schools in advanced status regarding the accountability consequences of NCLB. The benefit of this proactive implementation schedule is that Michigan had the accountability structure in place to serve as the foundation for compliance with NCLB. Michigan's academic standards, assessment protocol, and reporting processes were well ahead of many states around the country. This situation has led to an effective transition into meeting NCLB requirements within the state.

Michigan displays high levels of NCLB implementation in several other areas as well. The state has taken effective steps to ensure that teachers and paraprofessionals are highly qualified. The existing school choice policies of Michigan make the transition to NCLB compliance in this area less difficult than in many states across the country.

Other exceptional practices were also found by the CCSSO/MGT review team throughout the Michigan Department of Education. Descriptions of effective policies and practices in the implementation of NCLB requirements are provided in Section 3 of this report. Commendations based on exemplary policies and practices are also included to highlight Michigan's successes in NCLB implementation.

## **2.2 Agency Improvement Opportunities**

Issues related to effective academic data management and reporting are primary concerns for the Michigan Department of Education. The de-centralization of various functions of data management and processing has created a lack of coordinated oversight and communication regarding these critical areas. This situation has led to concerns in data accuracy and the ability to report school accountability status correctly. As the backbone of NCLB and state accountability efforts, data comprise both the critical input—raw information on Michigan demographics and performance, and the critical output—processed performance information included in state and federal reports. As such, data collection, processing, and reporting concerns in Michigan are primary targets of MDE improvement efforts and receive substantial consideration in this report.

There is also an overarching lack of formal strategic planning for NCLB implementation within the individual programs and MDE as a whole. Currently, many simultaneous implementation planning initiatives are taking place and action plans have been created without effective coordination or monitoring. While these individual efforts may be appropriate, they are not part of a focused and centralized effort, and thus create the potential for duplication or omission of activities critical to the successful implementation of NCLB requirements and to the sustained success of Michigan public schools. The requirements, and indeed the consequences, of NCLB are substantial. These requirements demand tailored, refined action planning at the program level as well as comprehensive strategic planning the Department of Education as a whole. In other words, the agency has too many action planning documents which have not been folded into an overall strategic plan to focus the state, ISDs, school districts, and schools in a unified direction.

In addition, there are numerous systemwide opportunities to improve the effective implementation of NCLB requirements and to maximize the benefits of this implementation process. Recommendations for improvement and strategies to enhance the benefits of NCLB in Michigan are included in Section 3 of this report.

**SECTION 3 – FINDINGS,  
COMMENDATIONS, AND  
RECOMMENDATIONS**

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## **SECTION 3 – FINDINGS, COMMENDATIONS, AND RECOMMENDATIONS**

This section of the CCSSO/MGT report examines the 18 components of NCLB we reviewed. Utilizing the diagnostic review guidelines developed for this study, the review team collected information from multiple sources on each component and conducted on-site interviews to assess organizational structure, relevant practices, and overall policy implementation. Each of the following subsections detail the results of data collection activities, interviews, and analyses conducted by the review team for the 18 components, including:

- Academic Standards
- Accountability/Adequate Yearly Progress (AYP)
- Reporting
- Low-Performing Schools
- School Support and Recognition
- Student Assessment
- Teacher Qualifications
- Paraprofessional Qualifications
- Reading First/Early Reading First Programs
- Transferability
- Data Management
- Public School Choice
- Professional Development
- Students With Disabilities and Limited English Proficiency (LEP)
- Supplemental Educational Services
- Educational Technology
- Student Safety & Health
- Overall Organization of the SEA

The first part of each subsection contains NCLB requirements. Findings of the implementation of the 18 components are presented next so that each component of NCLB can be detailed in isolation, providing a clear understanding of the issues affecting the implementation of the component. Implementation strengths and improvement opportunities are included, and commentary and analysis are provided to support the findings.

Each of the NCLB components are given an overall rating using the following rubric levels:

- 1 – Little or no development and implementation
- 2 – Limited development or partial implementation
- 3 – Fully functioning and operational level of development and implementation
- 4 – Exemplary level of development and implementation

The final part of each subsection contains commendations and recommendations for the individual components based on information previously detailed. A listing of the most successful aspects of each component as well as recommended strategies and actions

to address needed improvements are included. Recommendations offered for each component should serve as the basis for systemic change and can guide the Michigan Department of Education in developing future implementation activities.

### **COMPONENT 1: CHALLENGING ACADEMIC STANDARDS**

**Definition:** Federal law requires the development of academic content and achievement standards in reading, language arts, math, and science that apply to all schools and students uniformly. Reading, language arts, and math standards were mandated to be in place at the beginning of the 1997-98 school year under the 1994 reauthorization of ESEA. Rigorous standards in science must be developed by the 2005-06 school year. The state may adopt standards in other subjects as they determine necessary. **(Title I, Part A, Section 1111)**

In 1995, the Michigan State Board of Education approved model content standards for curriculum.

**Rubric Score: 3**

#### **FINDINGS**

Quality core academic standards are a key component of any effective educational program. Standards provide the benchmarks that should guide instructional philosophy and practice within an educational organization to promote sustainable student growth and achievement. With this in mind, NCLB requires states to develop challenging academic standards to drive school and student improvement efforts across the nation. Accountability initiatives must be aligned with these content standards, and as such, this is a critical area for all states, including Michigan.

The content standards approved by the Michigan State Board in 1995 were developed by parents, educators, business leaders, and university professors. These core standards provide descriptions of what students should know and be able to do in subject areas. Approximately 16 percent of the 565 Michigan school districts had already begun creating grade-level expectations prior to the implementation of NCLB. State staff brought in local educators from these districts to review content standards development. In addition, benchmarks (learning objectives) were drafted for each of the content areas to further clarify the content standards. The standards and benchmarks are not a state curriculum, rather they are designed to be used by school districts as they develop curricula tailored for local implementation.

These standards and benchmarks are contained in the *Michigan Curriculum Framework* (published in 1996) [http://www.michigan.gov/documents/MichiganCurriculumFramework8172\\_7.pdf](http://www.michigan.gov/documents/MichiganCurriculumFramework8172_7.pdf). The *Framework* is a resource for helping Michigan's public and private schools design, implement, and assess curricula. Subjects outlined in the framework document include English/language arts, mathematics, science, and social studies. Additionally, standards have been developed for fine arts, career and employability, technology, world languages, health education, and physical education.

The Michigan Department of Education has a parent brochure on the state Web site entitled, *High Standards for Michigan Students; Achieving and Succeeding*. This brochure was widely distributed to parents in the state and is easily accessed via the Web. The brochure clearly explains what parents and students need to know regarding the English/language arts, math, social studies, and science, as well as seven distinct steps parents should take to actively get involved in their child's education. Another brochure, *30 Ideas in 30 Days*, developed by the Superintendent of Public Instruction as a compilation of observations gleaned from years of experience in the private and public sectors, is also available on-line to engage all citizens in making Michigan a model state for public education.

In July 2003, Achieve, Inc. conducted an external review of the revised (draft) English/language arts and mathematics content expectations comparing Michigan's standards to those in other states. Achieve provided its review of the July drafts to the state in mid-August. Achieve stated that the new draft mathematics grade-level content expectations represent a major advance over the previous framework and content expectations. Achieve reported that the mathematics content expectations do not "realize their full potential" and made several recommendations for improvement including, but not limited to:

- add better examples of mathematics tasks and problems to illustrate the complexity and depth of mathematics intended by these standards;
- conduct further editing to simplify language and improve consistency of expectations; and
- clarify the distinction between a standard and subpoint, and make the document more user-friendly.

Again, revisions were made to the grade level content expectations (GLCE) and completed in September. Achieve once again reviewed the most recent versions of the GLCEs and overall found that the grade-level content expectations in English/language arts are of such quality that they "can be considered among the best in the nation." The only recommendations Achieve made for further refinement was to improve the document's formatting and consider using an improved introduction for the new content expectations document. While Achieve conducted a comprehensive review of the standards, the review process omitted the inclusion of some portions of the original district staff's input in Mathematics. This omission caused concern among district and school-level staff. Also, the CCSSO/MGT consultants could not find a plan which includes the steps, timeline, and person(s) responsible for the implementation of the Achieve recommendations.

The CCSSO/MGT survey results confirm that the state has quality academic standards. Eighty-seven (87) percent of the senior managers stated that the academic standards are either in compliance or in the process of becoming compliant, and 82 percent either *strongly agree* or *agree* that the implementation of academic standards will benefit students.

The initiatives that are currently lacking to ensure that the new standards are thoroughly understood by district and school staff include:

- a document that establishes the link between the previous standards and the new standards (thus making the transition easier for teachers);
- a companion document to assist teachers in the implementation and use of the new standards; and
- data which show the alignment of math and language arts to instructional materials and textbooks.

At the time of the on-site visit, a team had been formed to begin working on the above documents. The state previously produced a CD called MI-Climb that teachers can use to retrieve lesson plans and instructional materials aligned with the standards. However, the material on the CD has not been revised to reflect the new standards.

Exhibit 1-1 shows a review of the Michigan standards and accountability system in *Education Week's* report titled, *Quality Counts, 2004*. As shown, Michigan received a B or 85 percent in the *Quality Counts Report* (only 10 states received a ranking of A). States are ranked by number grade to the nearest decimal.

In an Education Commission of the States (ECS) report titled, *How Ready are States to Implement President's Bush's Education Plan*, Michigan was rated a D on science standards/bands and a D on history (or social studies) standards/bands. This study is based on data from the American Federation of Teachers document titled, *The State of the State Standards, Fordham Foundation, 2000*. Interviews with MDE senior managers confirm that the science standards/bands were revised in 2000; however, the social studies bands have not been updated since 1996. While overall science standardized assessment scores are improving, a review of data shows that the social studies scores have not shown marked improvement over the past two years.

At the time of the on-site visit, the method of distribution of the revised standards had not been determined. However, a committee composed of various stakeholders from the 57 Intermediate School Districts (ISDs), the Grade-Level Content Expectations (GLCE) Dissemination Work Group, had been formed. At that time, the team overseeing the dissemination plan for the content standards had two meetings with representatives from IHE's, Educational Organizations, intermediate and local school districts, that have focused on developing a plan. The group planned to start with a March 30 conference focusing on the GLCEs sponsored by Michigan State University. During April and May, regional seminars addressing the GLCEs were scheduled. Additionally, the implementation team was in the process of developing a document to put on the Michigan Department of Education Web site that addresses timelines and questions and answers. The team's meeting on March 15 clarified these plans. The plan to date was to use the ISDs and other educational organizations to assist in the standards dissemination plan.

**EXHIBIT 1-1  
MICHIGAN - STANDARDS AND ACCOUNTABILITY  
EDUCATION WEEK'S QUALITY COUNTS REPORT 2004**

STATE	MICHIGAN	
Overall grade for standards and accountability <sup>G</sup>	B	85
<b>STANDARDS 40% of Grade</b>		
State has adopted standards in core subjects (2003-04) <sup>G</sup>		√
State has standards that are clear, specific, and grounded in content (2003) <sup>G</sup>	English/language arts	
	Mathematics	ES MS HS
	Science	ES MS HS
	Social studies/history	
State has a regular timeline for revising standards (2003-04) <sup>U</sup>		
<b>ASSESSMENTS 30% of Grade</b>		
Types of statewide tests required (2003-04) <sup>1, U</sup>	Aligned to state standards	
	Test custom-developed to match standards	√
	Augmented or hybrid test	
	Off-the-shelf/norm-referenced test (NRT)	
Types of test items state uses to measure student performance (2003-04) <sup>G</sup>	Multiple-choice	ES MS HS
	Short-answer	ES MS HS
	Extended-response	
	English/language arts	ES MS HS
	Other subject(s)	ES MS HS
	Portfolio	
Subjects in which state uses assessments aligned to state standards (2003-04) <sup>G</sup>	English/language arts	ES MS HS
	Mathematics	ES MS HS
	Science	ES MS HS
	Social studies/history	ES MS HS
State standards-based tests have undergone an external-alignment review (2003-04) <sup>U</sup>		√
<b>SCHOOL ACCOUNTABILITY 30% of Grade</b>		
State holds schools accountable for performance (2003-04)		
State requires report cards for all schools <sup>G</sup>		√
School report cards include student-performance data disaggregated by: <sup>U</sup>	Race <sup>2</sup>	A/P,B,H,N/AK,W
	Low income	√
	Limited-English proficiency	√
	Special education/disability	√
High school report cards include disaggregated graduation/dropout rates <sup>U</sup>		√

ES = elementary school, MS = middle school, HS = high school. G = Graded; U = Ungraded.

**EXHIBIT 1-1 (Continued)  
MICHIGAN - STANDARDS AND ACCOUNTABILITY  
EDUCATION WEEK'S QUALITY COUNTS REPORT 2004**

State has a statewide student-identification system 2003 <sup>U</sup>		√
State assigns ratings to all schools based on <sup>G</sup>	Adequate yearly progress	√
	Additional state-developed criteria <sup>6</sup>	√
Number of schools that did not make adequate yearly progress (2002-03) <sup>8, U</sup>		-
Number of schools identified as low-performing based on adequate yearly progress (2002-03) <sup>8, 9, U</sup>		-
Information state uses to evaluate schools <sup>U</sup>	Student test scores only	*
	Test scores and other information	√
	Site visits or reviews	*
	<b>Test scores of specific student subgroups</b>	
	Race	√
	Low income	√
	Limited-English proficiency	√
	Special education/disability	√
	Lowest performers	*
State provides assistance to low-performing schools <sup>11, G</sup>		√
State sanctions low-performing schools <sup>12, G</sup>		√
Sanctions include: <sup>13</sup>	School closure	√
	Reconstitution	√
	Reconstituting schools as charters	√
	Permitting student transfers	√
	Turning school over to private management	√
	Withholding funds	√
State provides rewards to high-performing or improved schools <sup>13, G</sup>		
<b>ADDITIONAL INFORMATION: STUDENT ACCOUNTABILITY<sup>U</sup></b>		
Promotion contingent on performance on statewide exams (2003-04)		
Graduation contingent on performance on statewide exit or end-of-course exams (2003-04)		

\*Not filled in on the original report.

**EXHIBIT 1-1 (Continued)  
MICHIGAN - STANDARDS AND ACCOUNTABILITY  
EDUCATION WEEK'S QUALITY COUNTS REPORT 2004**

<b>State has appeals process for students who fail exit or end-of-course exams (2003-04)</b>	
<b>State has alternative criteria for students to earn standard diplomas if they fail exit or end-of-course exams (2003-04)</b>	
<b>State has nonstandard diplomas or a tiered diploma system for students who fail exit or end-of-course exams (2003-04)</b>	
<b>Exit or end-of-course exams are based on state 10<sup>th</sup> grade standards or higher (2003-04)</b>	
<b>State requires remediation for students failing promotion, exit, or end-of-course exams (2003-04)</b>	
<b>State finances remediation for students failing promotion, exit, or end-of-course exams (2003-04)</b>	

Source: *Education Week's Quality Counts Report, 2004.*

Notes:

<sup>1</sup>Custom-developed/criterion referenced tests (CRT) are explicitly designed to measure state content standards. Augmented/hybrid tests incorporate elements of both norm-referenced tests and CRTs explicitly designed to measure state content standards (including NRTs that have been augmented or modified to better reflect state standards). Norm-referenced tests are commercially developed or "off the shelf" tests that have NOT been modified to reflect state content standards.

<sup>2</sup>Data are disaggregated by the following racial categories A = Asian, AK = Alaskan Native, B = Black, H = Hispanic, N = Native American, P = Pacific Islander, W = White.

<sup>3</sup>State provides disaggregated information on a separate "adequate yearly progress" or No Child Left Behind report card.

<sup>4</sup>State does not publish school-level disaggregated data on its school report cards but does make disaggregated data available on the Web.

<sup>5</sup>State provides disaggregated graduation rates and/or dropout rates on separate AYP or NCLB report cards.

<sup>6</sup>Additional state-developed criteria refers to states that use additional information to rate schools beyond that required by federal law for AYP, or that apply a separate rating to schools statewide in addition to AYP ratings. For example, a state may have a method of assigning letter grades to schools based on the schools' performance on statewide tests, or may require that schools meet criteria in addition to meeting AYP in order to receive high ratings.

<sup>7</sup>Ratings based on state-developed criteria are assigned biennially.

<sup>8</sup>These numbers are preliminary, pending the outcome of appeals, or state has not determined ratings for specific types of schools, such as small schools, high schools, etc.

<sup>9</sup>This column reflects the number of schools identified for improvement based on adequate yearly progress, not Title I schools only.

<sup>10</sup>Attendance and graduation rates were used to rate middle and high schools respectively. The state is taking this year to determine baseline test scores at the middle and high school levels.

<sup>11</sup>States get credit if assistance is available statewide, not just to Title I schools.

<sup>12</sup>States get credit if the sanctions apply statewide, not just to Title I schools.

<sup>13</sup>Rewards do not have to be tied to statewide rating system.

Subsequent to the on-site visit, a three-tier approach was developed to disseminate the GLCEs (standards). This approach includes:

- Tier 1: Overview of GLCEs using the video produced from the March 30 Conference in which this is presented. Provide CDs and/or hard copy, and/or Web site reference.
- Tier 2: Follow up conversations spearheaded by the Intermediate School Districts and local school districts to drill down into looking at each grade level. The model being used for the break-out sessions on March 30 can be implemented.
- Tier 3: ISDs will assist districts in aligning their current curriculum structure. Instructional strategies and modules will also be a part of this tier.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The Michigan Department of Education is committed to the periodic review of its core subject standards by outside consultants to ensure they are of high quality and are used for the purposes for which they were designed.**
- **The Michigan Department of Education is commended for effectively communicating the intent of the new standards to parents and the community.**
- **The Superintendent of Public Instruction is commended for actively seeking support in the private and public sectors for engaging all citizens in making Michigan a model state for public education.**

### **RECOMMENDATIONS**

#### **Recommendation 1-1:**

**Create a formal action plan to implement the Achieve, Inc. recommendations. It is critical that Michigan completes this process to effectively implement standards-based education within the state. This action plan must be linked to the Department of Education's overall strategic plan.**

#### **Recommendation 1-2:**

**Create a tracking system for reporting the status of implementing recommendations. A formalized monitoring process will increase the**

effectiveness of implementation and will promote the ongoing success of standards-based education in Michigan.

**Recommendation 1-3:**

Ensure the state's three-tiered standards implementation system is followed and create a comparison document which includes specifics addressing what, when, where, and how the standards will be disseminated. This document should also provide a clear definition of all stakeholder roles, including Department of Education staff, Intermediate School District (ISD) staff, the Partners for Success Educators, field service representatives, principals, and teachers. In addition, the document should provide information on the alternate GLCEs for students participating in MI-Access. This document should increase overall understanding of the standards and improve systemwide buy-in, thereby increasing statewide capacity for effective standards implementation.

**Recommendation 1-4:**

Provide training for the Intermediate School District (ISD) staff, the Partner for Success Educators, field service representatives, and other appropriate staff on how to implement, assess, and align a standards-based curriculum. To effectively serve as instructional leaders in this area, individuals in these key positions should be proficient in the subject matter and process associated with standards-based education.

**Recommendation 1-5:**

Create a monitoring system to ensure all stakeholders are held accountable in the school improvement process for achieving clearly defined implementation of a standards-based curriculum. Effective monitoring is essential to consistent implementation and sustainable improvement in this area, and should serve as the foundation for systemwide diagnosis and change.

**Recommendation 1-6:**

Revise the social studies standards/bands, and provide in all future standard revisions a requirement that the state involve school administrators, teachers, and district-level staff in all phases of the revision. Stakeholder buy-in is important in general education policy/procedures development, but is even more critical when considering changes in academic standards.

**Recommendation 1-7:**

Proceed with plans to create a document that establishes linkage between the previous standards and the new standards—a crosswalk between the old and new standards should be created as well. Other needed documents should include one that assists teachers in the use of the new standards, and a document which shows the alignment of the mathematics and English/language arts standards to instructional materials and textbooks. Each of these documents must be linked to the Department's overall strategic plan.

**Recommendation 1-8:**

Conduct a comprehensive needs assessment of academic standards implementation. Michigan should examine the academic elements of the system, including standards, curricula, assessments, professional development for teachers, and the support and incentives for students as a whole to determine where there are gaps, where pieces do not fit together, and where more development must be undertaken to ensure that the system is educationally sound and is the most efficient and effective. The results of this analysis can significantly improve overall classroom implementation of new content standards by providing more focused and understandable implementation plans and process. Once again, the proposed needs assessment must be linked to the Department's overall strategic plan.

**Recommendation 1-9:**

Update the MI-Climb CD (or some other venue) to ensure teachers have adequate lesson plans and resources needed to successfully implement the newly revised standards. Principals should be trained as well. Michigan schools must have the means to ensure the ends, and the state must identify what teachers need to know to help all students achieve challenging standards.

**COMPONENT 2: ACCOUNTABILITY AND ADEQUATE YEARLY PROGRESS**

**Definition:** Under NCLB, states must develop a statewide accountability system to monitor each school district's achievement of Adequate Yearly Progress (AYP) and to hold school districts accountable. Schools and school districts that do not meet AYP will be subject to sanctions designed to bring about meaningful change in student instruction and achievement. **(Title I, Part A, Section 1111 and 1116)**

All states must develop a definition of Adequate Yearly Progress (AYP) to promote continuous and substantial improvement for students in all schools and school districts. States must establish separate measurable annual objectives to measure progress of schools and school districts to ensure all subgroups of students reach proficiency within 12 years. Annual intermediate performance targets must be established to measure progress, with the first increase occurring no later than the 2004-05 school year. **(Title I, Part A, Section 1111)**

**Rubric Score: 2.5**

**FINDINGS**

Adequate Yearly Progress (AYP) is perhaps, the most frequently discussed topic in public education. The requirement that Title I schools in America meet AYP standards under the Elementary and Secondary Education Act of 1994, and the subsequent reauthorization in 2001 (NCLB), has left states and school districts to manage a new

layer of federal accountability. Federal AYP requirements are reviewed by many educators as too rigid, with consequences for failure that are too severe. Regardless of personal views on the legislation, AYP regulations are presenting challenges for states across the nation and Michigan is no exception.

Adequate Yearly Progress (AYP) is the measure used to hold Title I schools and school districts responsible for student achievement in the areas of English/language arts and mathematics. In Michigan, AYP is based on a measure of student achievement on the Michigan Education Assessment System (MEAS), which includes the MEAP tests and Mi-Access, the alternate assessment available for students with severe cognitive disabilities. For elementary and middle schools in Michigan, attendance rates are used. For high schools, graduation rates are used.

A Title I school or district makes AYP for a particular year based on achievement if at least a certain percentage of students meets or exceeds state standards on the state assessments, at least 95 percent of the students participated in state assessments, and the school or district has an acceptable attendance or graduation rate. For tests with four achievement levels, students must score in one of the top two achievement levels (Levels 1 and 2) in order to meet state standards. For the older tests with only three achievement levels, students must score in the top level to meet state standards. For students participating in MI-Access scores, there are three achievement categories (Surpassed, Attained, or Emerging Towards the Performance considered “proficient”) when calculating AYP. The required percentages are calculated separately for elementary, middle, and high school and are the same for all schools and districts in the state and are known as the “annual state objectives.”

The annual state objectives apply to the entire group of students in the school or district who took the MEAP English language arts and mathematics tests. They also apply separately to each of the following groups of students, if at least 30 students in the group took a particular MEAP test:

- students from different racial/ethnic groups;
- students from low-income families;
- students with Limited English Proficiency; and
- students with disabilities.

For a Title I school (or district) to make AYP based on achievement, each of the above groups of students must also meet the annual state objective. At least 95 percent of the students in each group must have taken the MEAP or an alternate assessment for students with disabilities, and the school or district must also have acceptable attendance or graduation rates (See Component 14 for more information on Students with Disabilities).

Michigan's statewide accountability/accreditation system for all public schools was approved by the U.S. Department of Education in June 2003. School accreditation through Michigan's process entitled, Education YES! combines scores based on MEAP results (measures of achievement status to measure how well a school is doing in educating all students, achievement change to measure whether student achievement is improving or declining, and beginning in 2006-07, achievement growth to measure whether students are experiencing at least one year of academic growth for each year of

instruction) and school performance grades based on school team's self-assessment in the areas of engagement, instructional quality, and learning opportunities.

Exhibit 2-1 provides the 11 performance indicators, which are shown under each of the three main categories of engagement, instructional quality, and learning opportunity.

**EXHIBIT 2-1  
INDICATORS OF SCHOOL PERFORMANCE**

<b>ENGAGEMENT</b>	<b>INSTRUCTIONAL QUALITY</b>	<b>LEARNING OPPORTUNITIES</b>
Continuous Improvement	Extended Learning Opportunities	Family Involvement
	Teacher Quality/ Professional Development	Student Attendance & Dropout Rate
Curriculum Alignment		Arts Education and Humanities
Performance Management System	Advanced Coursework	School Facilities

Source: Michigan State Application Accountability Workbook, 2003.

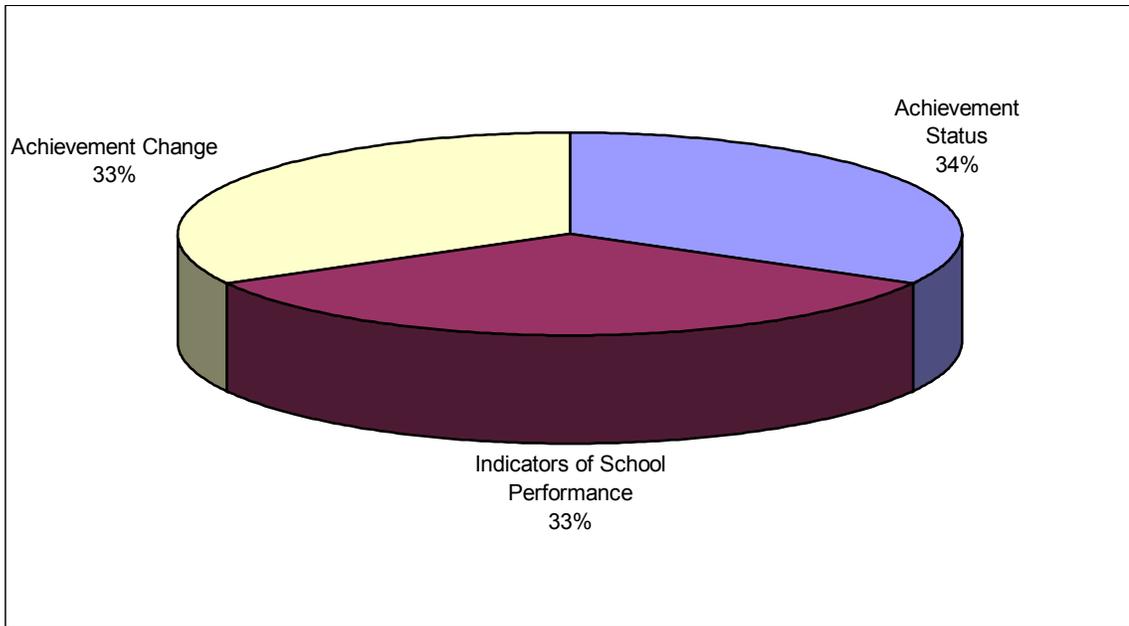
Exhibit 2-2 illustrates the percentage weighting for each of the indicator categories for achievement change and achievement status.

Michigan has been calculating Adequate Yearly Progress (AYP) since the 1996-97 school year using a measure of year-to-year student achievement on MEAP assessments. In addition to mathematics and reading, Michigan previously required that a school demonstrate Adequate Yearly Progress in science and writing. A school that failed to make AYP in any one of these subjects for two consecutive years was previously identified for improvement.

In Michigan, the revised definition for AYP was approved by the State Board of Education in November 2002 and takes into account the following:

- the number of students proficient in math and English/language arts;
- the rate of participation on state assessments (95% minimum);
- attendance rates in elementary and middle schools (85%); and
- graduation rates in high school (80%).

**EXHIBIT 2-2  
EDUCATION YES! WEIGHTING**



Source: Michigan State Application Accountability Workbook, 2003.

Note: This chart and process was modified in March 2003 to consolidate the indicator components and to postpone the growth measure.

Michigan uses a three-step, multi-year averaging system to determine AYP. All Michigan public schools receive an annual Adequate Yearly Progress report based on state assessments and other state indicators. Adequate Yearly Progress is included in each school's and district's report to the community and state. However, the requirements associated with failure to make AYP, such as school improvement status, corrective action, and restructuring apply only to Title I schools. Although only Title I schools are subject to consequences for failure to make AYP as defined in NCLB, all schools in a Michigan school district are held accountable to the statewide accountability system, Education YES!

There are four subgroups identified in the NCLB for determining AYP: race and ethnicity, students with disabilities, English Language Learners, and economically disadvantaged. In addition, for reporting achievement, two other student subgroups must be included: gender and migrant. Districts can disaggregate MEAS achievement data by subgroup using Test Wiz at [www.testwiz.com](http://www.testwiz.com).

Michigan's AYP definition also includes a "safe harbor" provision. If a school or district, as a whole or for a subgroup, does not meet a state AYP objective, it may make AYP by showing improvement from the prior year by decreasing the percent of not proficient students by 10 percent and meet an additional accountability indicator (attendance or graduation rate).

If a school receives a preliminary grade of A on the Education YES! report card but does not make AYP, the school receives an overall grade of a B. If a school receives unacceptable grades in all subject areas but makes AYP, it is accredited under the new system. A school's composite school grade will be used to prioritize assistance to underperforming schools and to prioritize interventions to improve student achievement.

Exhibit 2-3 outlines the unified accountability model for Michigan schools.

**EXHIBIT 2-3  
UNIFIED ACCOUNTABILITY FOR MICHIGAN SCHOOLS**

Education YES! Composite Score	A	B (iv)	A
	B	B (iv)	B
	C	C (iii)	C
	D	D/Alert (ii)	C
	F	Unaccredited (I)	D/Alert
		Did Not Make AYP	Makes AYP

Source: Michigan State Application Accountability Workbook, Attachment 2003.

i – iv Priorities for Assistance and Intervention

AYP calculated using No Child Left Behind Definition

The Michigan School Code provides that the Superintendent of Public Instruction may apply one of several consequences for a school that is unaccredited. Consequences for those schools not meeting AYP, including non-Title I schools, may include any of the following corrective actions: state appointment of an administrator to operate the school; the opportunity given to parents to send a student to another school in the district; permission granted to a school to affiliate with a research-based improvement program; or closing of the school. Up to five percent of state funds attributable to students in an unaccredited school may be withheld temporarily at the discretion of the State Superintendent until the school submits an acceptable plan for improving student achievement.

Starting in May 2003, the state began offering the AYP Principals' Academy to targeted principals to develop a specific turn-around plan for those schools not meeting AYP. The academy also helps principals prepare their staff for intensive professional development programs to bring their schools back into compliance. In July 2003, the first AYP Teachers' Academy was conducted for educators employed in school buildings that were identified for improvement and/or corrective action. Both academies are vital components of Michigan's overall focus to address the complex needs of low-performing schools across the state.

Additionally, the Michigan School Public Relations Association and the Michigan Department of Education published and widely distributed its *Toolkit for Communicating About Adequate Yearly Progress* which provides all stakeholders with relevant and reliable information regarding AYP requirements. The guide was published in 2003 and is very comprehensive. This guide includes sections on relating key messages about AYP, talking points for superintendents, tips for communicating with the media, sample news releases, and local AYP communication plan and accompanying templates.

The Michigan Department of Education outlines specific requirements, whose options vary depending on the number of years the school has failed, for Title I schools that do not make AYP. The plan consists of five phases:

- Phases I-III–School Improvement;
- Phase IV–Corrective Action; and
- Phase V–Restructuring.

Numeric scores from zero to 100 are awarded along with a letter grade that is reported on the annual school report card. Accreditation is awarded based on the letter grade achieved:

- schools with grades of A, B, & C grades receive accreditation;
- schools with a D grade are considered “On Alert” and receive conditional accreditation; and
- schools with an F grade receive no accreditation and are offered immediate assistance or support.

Finally, a composite school grade is derived from the individual school score and the school's AYP status to be reported on the school's report card. Beginning in the 2006-07 school year, 67 percent of the composite grade will be based on achievement status, change, and growth scores and the other 33 percent will come from the school performance indicators (as shown in Exhibit 2-3).

One of the indicators in Component 2 ascertains if the state has adopted a consistent definition of full academic year consistent with NCLB. Michigan defines the full academic year as enrollment on the two most recent official student headcount days prior to assessment administration windows. The application of this definition means that schools are only held accountable for those students they have had an opportunity to teach for at least a full academic year. The Department of Education has requested these data from CEPI; however, to date these data have not been provided. Although there is a field (Field 20) for these data, not all schools are recording these data or keeping the field updated. Staff interviewed in the MDE report that this is detrimental to the process, and they would like to have data detailing each student's date of enrollment to ensure the accountability of all students in the assessment system.

CCSSO/MGT survey results show that 67 percent of the senior managers either *strongly agree* or *agree* that the state's accountability/AYP process will benefit students and 27 percent either *strongly agree* or *agree* that the state will have difficulty complying with NCLB state requirements. Eighty-six (86) percent of the respondents believe that the

state is in compliance or in the process of becoming compliant as it relates to the accountability/AYP process. While these results overall are positive, there were several comments made with reference to one of the greatest challenges in meeting NCLB requirements. This challenge relates to LEP and students with disabilities. (refer to Component 14 for more details related to the assessment of LEP and students with disabilities).

The implementation of the accountability and AYP process in Michigan is a promising initiative; however, it is not free from difficulties and issues that can arise in such a complex and changing policy environment. In fact, Michigan has some state-level initiatives that in some instances overlap and/or compete with NCLB.

As a result of numerous interviews and review of data, consultants found that there are several issues related to the state's accountability and Adequate Yearly Progress that need to be addressed.

Prior to NCLB (in order to be classified as proficient), Michigan schools had to present cross-sectional improvement in student achievement or a 75 percent passing rate in four core subjects. Under the initial AYP targets, 47 percent of elementary students have to meet or exceed state standards in mathematics, and 38 percent of elementary students have to meet or exceed state standards for English/language arts for a school to meet its initial AYP target. In middle schools, 31 percent of students are required to meet or exceed standards in both mathematics and English/language arts. Also under the new standards, student performance on the science components of MEAS are no longer taken into account. While science and social studies are not counted as part of the state's AYP formula, these two subjects are a component of the Education YES! Accreditation system. Under the previous system, more schools were placed on the "failing" list due to the rigorous requirements. Many staff state they believe the Michigan has been "punished" by NCLB mandates because they already had a system in place, but NCLB caused them to have (according to the USDOE) 20 percent of all failing schools in the United States in 2002. Some interviewees report that the "real" number of schools that are failing to meet Michigan standards remains "a mystery." One key factor contributing to this "mystery" is that an assessment scoring company inadvertently lost 3,000 assessments in 2002-03; thus, a precise number of schools meeting AYP was questionable (see Component 3 for more information on assessment).

Under the current Michigan system, a school may not be successful under NCLB Adequate Yearly Progress requirements, but graded as successful under the Education YES! initiative. This has caused confusion and has resulted in mixed messages at the state, district, and school levels as to what really constitutes a successful or failing school.

The state has developed a system that identifies 11 other indicators of a successful school and is not placing all of the weight on a single assessment. However, schools self-report on the 11 indicators (see Exhibit 2-2), and there is no system in place to:

- measure the quality of success of the indicators;
- verify that the self-report is accurate; and

- ensure that the Intermediate School Districts play an integral role in assessing the indicators.

Additionally, some schools have voiced concern to the state because they believe their school self-reported fairly and honestly, while other schools in an effort to “look good,” were not honest in their self-reports.

Many survey results as well as interviews indicate that clean, verified data continue to be a major obstacle in ensuring the success of the AYP/accountability system in Michigan. Due to the data functions being transferred to various locations and the lack of the involvement of the ISDs in assisting in the collection and verifying data sent to the state, there exists a question of the quality of data-driven decisions (see Component 11 for additional information on data management).

One staff member in the Department of Education has the ultimate responsibility to ensure the state is fulfilling its requirements as it relates to accountability and AYP. Cross-training is needed so that other staff possess the skills necessary to carry out this responsibilities should the one key person become unavailable to do so.

Despite issues with the Education YES! and the state’s accountability system, early implementation of the federal accountability legislation has had positive outcomes. To build on these positive outcomes, the state should ensure the legitimacy and credibility of its assessment results (see Component 6 for more information on assessment).

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The state is commended for developing an integrated system that identifies 11 other indicators of a successful school and for not placing all the weight or emphasis on a single assessment. This process places value on growth and is unique to Michigan.**
- **The Michigan Department of Education is commended for hosting numerous, well-received AYP academies for principals and teachers in an effort to inform all schools of the process and requirements.**
- **The Michigan School Public Relations Association and the Michigan Department of Education are commended for publishing and widely distributing its *Toolkit for Communicating About Adequate Yearly Progress* which provides all stakeholders with relevant and reliable information regarding AYP requirements.**

## **RECOMMENDATIONS**

### **Recommendation 2-1:**

**Establish a Technical Advisory Committee composed of local and state leaders, as well as national experts, to review the Education YES! and NCLB initiatives. The Committee should ensure that these initiatives are in alignment, provide for high standards, are non-competing, and give clear direction as to which schools are succeeding and which are not. The dual or tiered system of accountability should align state, district, and school data collection and use, while specific goals should be set at the district level using multiple measures to assess progress on the goals.**

### **Recommendation 2-2:**

**Ensure that the Intermediate School Districts (ISDs) play a role in designing, implementing, and monitoring the criteria and rubric scoring system for the 11 indicators so that schools are reporting accurately and results are data-driven. The implementation of this recommendation should result in the active involvement of affected school districts and should provide assurances that the districts have had an opportunity to provide input. By developing the rubrics and criteria, the schools will have more meaningful scores on the indicators. This action will also facilitate that the school's accomplishments on the indicators represent essential research-based characteristics of high performing schools.**

### **Recommendation 2-3:**

**Cross-train Department of Education staff to ensure the state is fulfilling its requirements as it relates to accountability and AYP. The implementation of this recommendation reflects the application of established best practices designed to ensure that assigned responsibilities are carried out.**

### **Recommendation 2-4:**

**Establish a more effective method of securing accurate data from schools as it related to the definition of a full academic school year, which includes the information on a date certain when a student is first enrolled in the school building. The accomplishment of this recommendation will assist in providing a stable starting date against which schools have an appropriate amount of time to prepare students for assessment.**

**COMPONENT 3: REPORTING**

**Definition:** The NCLB Act requires that all states develop, produce, and disseminate annual report cards that communicate information on how students are achieving overall and by disaggregated student subgroups. States are also required to produce an annual report to the Secretary of Education regarding their progress in developing and implementing academic assessments, student achievement data by subgroup, and information detailing the acquisition of English proficiency by students identified as limited English proficient. This report should also include information on specific areas including the names of schools identified as in need of improvement, public school choice, supplemental service programs, and teacher quality. **(Title I, Part A, Section 1111 and Subpart 1)**

**Rubric Score: 2.5**

**FINDINGS**

The reporting requirements of NCLB focus on providing a clear understanding of student performance by demographic subgroup. This requirement mandates that schools, school districts, and states are improving student achievement for all students, and not just relying on aggregate performance information that may hide the performance of certain students. From these disaggregated data, financial, programmatic, and instructional choices can be made to pinpoint effective improvement strategies for the maximum benefit to students.

Information on school district and individual school performance are made available on the Internet and must include the following information:

- aggregate student achievement at each proficiency level on state assessments;
- student achievement at each proficiency level, disaggregated by:
  - race
  - ethnicity
  - gender
  - disability status
  - migrant status
  - English proficiency status
  - status as an economically disadvantaged student (if statistically sound);
- comparison between actual achievement of each group (excluding gender and migrant) and the state's annual measurable objectives;
- percentage of students not tested, disaggregated by each group (excluding gender and migrant);

- most recent two-year trend in achievement in each subject area and for each grade level;
- aggregate information on other indicators used to determine AYP;
- AYP information, including number, names, and percentage of Title I schools identified for school improvement, and how long identified; and
- comparison of school, school district, and state achievement on state assessments and other indicators of AYP.

The performance of the schools must be communicated to the citizens of Michigan and the Secretary of Education in a clear, comprehensive, and timely manner. Fifty-four (54) percent of senior staff reported that they *agree* that the implementation of reporting requirements under NCLB will benefit students. While this is not an overwhelming percentage, it is clear that accurate reporting of NCLB data is important to Michigan, both in the potential impact of NCLB accountability consequences and with regard to public relations.

Michigan has experienced some reporting difficulties that have resulted in problems in both implementing accountability requirements and in public relations. The previous school performance reporting cycle created a large percentage of appeals by schools citing inaccurate demographic data. The most recent school report cards, published on January 30, 2004, had to be adjusted for rounding inaccuracies.

The CCSSO/MGT team found that current challenges associated with preparing NCLB accountability reports include:

- Data problems, resulting from vendor error, school district data accuracy, and processing difficulties at the state level have affected the timeliness and quality of NCLB reporting. Interviews revealed that this is a primary area of concern among MDE staff.
- Capacity issues resulting from limited resources hinder MDE's ability to process and report data in a quality and timely manner. This has resulted in missed reporting deadlines and reporting mistakes that mar the credibility of Michigan's accountability activities.
- No formal coordinating plan exists among multiple Michigan agencies (i.e., MDE, Treasury, DIT, and CEPI) to drive NCLB reporting in the state. This lack of formal planning creates ambiguity and the potential for errors. A newly formed committee, comprised of members from DIT, MDE, and CEPI, has been created to address this issue.
- Organizational separation of data management responsibilities has caused disconnects affecting reporting quality. Differences among

the agencies involved in data reporting processes produce difficulties in coordinating data reporting activities.

- Data definitions related to school enrollment have created reporting difficulties. Enrollment data definitions are sometimes interpreted differently at the school level causing data input inaccuracies.
- The methodology used to determine graduation rate needed to be phased in due to data availability issues, but this information was not communicated to USDOE. Some data needed to calculate cohort graduation rates are not available; the void has affected the quality of Michigan's overall graduation rate data. However, with the incorporation of student unique identifying numbers last year, MDE will now be able to report cohort graduation rates once there are sufficient years of data to calculate them.
- CEPI data contained in the Single Record Student Database are not reliable for longitudinal analyses in some areas. This is due to previously mentioned interpretation issues as well as data entry issues at the district level.
- The segmentation of reporting is causing schools to report the same data multiple times. This impacts school and district buy-in reporting procedures and reduces the efficiency of data collection. While the passage of PA 180 does address the issue of schools reporting the same data multiple times to multiple entities at the state by identifying CEPI as the single data collection agency, the current situation remains an obstacle to effective data collection.
- The dual-assessment system is confusing to schools and school districts. Reporting on multiple accountability factors increases the likelihood of difficulties in data reporting.
- Appeals by Michigan schools are cumbersome, and the scope and duration of school appeals create a situation where staff members are duplicating work.

More detail on data management issues affecting NCLB reporting is provided in Component 11 of this report.

The reporting function of the Michigan Department of Education is understaffed. The CCSSO/MGT consultant team found that budget and staffing cuts have left MDE relying on essentially one person to understand and implement NCLB reporting activities. With no contract funds plus two unfunded positions, this situation leaves the MDE vulnerable in a critical area of NCLB implementation.

Another capacity issue within the reporting function is the inability to effectively plan for additional NCLB reporting requirements. At the time of the diagnostic review, all available resources had been focused on producing school-level reports, and no formal consideration had been given to the federal reporting format. The fact that the federal

reporting process is unclear at this stage of NCLB implementation is indicative of larger capacity issues.

Although there are issues in preparing school report cards in Michigan, the January 30<sup>th</sup> report was found to be an effective tool for communicating school performance. The report is well formatted, graphically appealing, and appropriate for varying stakeholders. The summary also includes much of the data required in the report to the Secretary of Education and, with some modification, could be used for that purpose.

While the report provides an effective platform to convey school performance information related to NCLB, the team also identified issues with state reporting that need to be addressed to bring it in compliance with NCLB requirements. These include:

- no information regarding the use of public school choice or supplemental educational services is provided as needed for the USDOE report; and
- no analyses of performance data exist to provide stakeholders with a clear understanding of individual report sections or overall education system performance.

It is clear that the Michigan Department of Education is aware of some of the reporting challenges associated with NCLB and is ready to address areas of concern.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The Michigan Department of Education is commended for performing additional reporting duties associated with NCLB in spite of capacity issues.**
- **The Michigan Department of Education developed quality school report cards that communicate needed performance information to stakeholders.**

### **RECOMMENDATIONS**

#### **Recommendation 3-1:**

**Continue to work with data management staff to improve data compilation and quality. Sustained collaboration in this area should result in increased reporting capacity over time (also see Component 11).**

#### **Recommendation 3-2:**

**Assess current capacity within the MDE reporting function to determine additional resources needed to meet reporting needs. This critical function of NCLB**

implementation serves as the primary public communication regarding school performance and should be adequately staffed and funded to ensure sustained viability and success (also see Recommendation 2-4).

**Recommendation 3-3:**

Develop a formal NCLB reporting plan that details data sources, collection timelines, and individual responsibilities. The articulation and codification of this process should serve as a planning milestone, thereby reducing informality and improving reporting efficiency.

**Recommendation 3-4:**

Assess the current student enrollment data definitions for accuracy and precision. Inefficiencies in basic student data will continue to cause reporting delays and will generate additional appeals from Michigan schools.

**Recommendation 3-5:**

Assess current graduation rate methodology for viability. Any shortfalls or needed modifications in this area should be addressed with USDOE.

**Recommendation 3-6:**

Assess the accuracy of cohort data and discuss needed modifications with USDOE. A negotiation between MDE and USDOE must take place if needed data are not available in the proper format to meet NCLB requirements on disaggregated data.

**Recommendation 3-7:**

Provide definitions and analyses to explain performance data included in the school report cards. Data without explanation are insufficient to promote systemic change.

**Recommendation 3-8:**

Develop a format for NCLB reporting to the Secretary of Education. The development of the revised reporting format should reduce the additional workload needed in preparing the federal report.

**Recommendation 3-9:**

Initiate cross training in reporting responsibilities for all staff associated with NCLB data compilation and reporting. It is imperative that these duties are integrated to ensure sustainable quality and accuracy in reporting (also see Recommendation 2-3).

**COMPONENT 4: LOW-PERFORMING SCHOOLS**

**Definition:** Under NCLB, states establish school support teams to assist schools and school districts in complying with school improvement requirements and give additional support to schools and districts identified for improvement. Title I schools and school districts that fail to meet state-mandated adequate yearly progress standards for two consecutive years must be identified for improvement (**Title I, Part A, Section 1111**).

**Rubric Score: 2.5**

**FINDINGS**

As NCLB consequences move forward, states are faced with the challenges associated with supporting low-performing schools. The federal legislation makes school improvement more than just a moral imperative; it is now essential to the ongoing viability of schools and school districts throughout the nation. It is clear that the additional pressure to improve low-performing schools is challenging the capacity and resources of many school districts.

Since the 2001–02 school year, the Michigan Department of Education has provided assistance in the form of partner evaluators to high priority schools through the Partnership for Success Program. This grant program is in its third and final year of implementation. During the current year (2003–04), the Partnership Program has been expanded to include services provided by the Intermediate School Districts (ISDs) and MDE Field Services employees.

The Office of School Improvement (OSI)'s 2003–04 strategic plan identifies 216 high priority schools (i.e., schools which did not make AYP), as needing assistance. Direct assistance is being provided by partner educators, Office of Field Service employees, and ISD School Improvement Facilitators working as teams in these schools.

The 2003-04 OSI Strategic Plan to assist high priority schools includes the following components:

- **Component 1: Database**
  - to be provided by CEPI - regional service areas, school profile, student achievement, MEAP math/reading results, and Gaps for Safe Harbor and AYP; intensity of need
  - Comprehensive Service Inventory Database created by OSI to determine the Instruction and Curriculum Resource Climate at each high priority school
- **Component 2: Direct Assistance to High Priority Schools**
  - data analysis, professional development, and the Children's Action Network (providing family resource centers in 20 of the 216 high priority schools)

- **Component 3: MI-MAP - the tool kit for school reform**
  - components include MI Plan, instructional design, resources, math strategies, data literacy curriculum, etc.
- **Component 4: Coaches Institute**
  - trained educators serve as a resource pool available to high priority schools.

To date, only minimal monitoring has been provided by the Michigan Department of Education and the ISDs on the effectiveness of the assistance provided to high priority schools.

According to the high priority schools model for Component 1, CEPI is to provide eight data elements. At the time of the on-site visit, however, only one database, school profiles, had been provided to OSPI by CEPI. Because of this limitation, OSI created its own inventory to obtain necessary information on the high priority schools. The Comprehensive Service Inventory created by OSPI and disseminated to high priority schools includes a request for information on ethnicity, gender, teachers (number and years of experience, class size) and about 22 other data elements. These data could be readily included in the CEPI database to avoid another state data request to high priority schools and another state database.

To facilitate assistance to high priority schools, the MDE Office of Field Services has developed a two-year plan for schools identified for improvement. The plan includes:

- data analysis;
- available resources;
- LEA requirements; and
- supplemental costs.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATION**

- **The Office of School Improvement (OSI) Strategic Plan for assistance provides a comprehensive outline of the components which need to be included in providing assistance to high priority schools throughout the State of Michigan.**

### **RECOMMENDATIONS:**

#### **Recommendation 4-1:**

**Develop a monitoring plan for the high priority schools improvement model to determine its effectiveness. One component of the monitoring plan should be to determine how many of the 216 schools were not on the January 2004 school report card list.**

**Recommendation 4-2:**

Identify a grant source or NCLB funding to continue the high priority school improvement model, if it is determined to be effective as measured in Recommendation 4-1. Assuming that the high priority school improvement model is shown to be effective, a source of revenue should be found to continue the Partnerships for Success Program.

**Recommendation 4-3:**

Work collaboratively with CEPI to ensure that all databases are available to the Michigan Department of Education and in a timely manner. Duplicative databases sent to school districts with overlapping requirements can be frustrating, and these data requests need to be centralized and coordinated (also see Component 11). (Note: The state is working on this recommendation with the passage and Governor's approval of PA 180).

**Recommendation 4-4:**

Provide more structure to the external review teams in terms of the role of individual members, required on-site time, relationship of the school improvement team to external teams, and responsibilities for monitoring. The OSI Strategic Plan needs to be more comprehensive. The role and responsibilities of all stakeholders should be well-defined with action plans and implementations strategies added to the plan.

**Recommendation 4-5:**

Ensure that the direct assistance provided to high priority schools, the coaches institute, and the tool kit for reform contain research-based strategies which are based on best practices. The agency has a model in place through the Office of School Improvement to provide state- and intermediate-level support to schools who do poorly on AYP/Education Yes! It is imperative that this support be based on effective, research-based practices.

**COMPONENT 5: SCHOOL SUPPORT AND RECOGNITION**

**Definition:** Federal law requires states to provide support to Title I schools and school districts in school improvement efforts. States must also develop a system of recognition for schools that have significantly closed the achievement gap or have exceeded AYP standards for two or more consecutive years. Schools in this category will be recognized as *Distinguished Schools*, and teachers in these schools may receive financial awards, based on the individual state recognition plan. (Title I, Part A, Section 1117).

**Rubric Score: 2.5**

## **FINDINGS**

With the increase in accountability activities and potential sanctions under the requirements of NCLB, there is an additional need and indeed a requirement, to provide school support and recognition activities. The goal of closing identified achievement gaps is an ambitious one, and one that requires a great deal of effort on the part of schools. When schools meet this challenge, states must be there to celebrate those successes. These activities not only serve to congratulate successful schools, but can also serve an important public relations function by highlighting the overall successes of Michigan's public education system.

The evidence for school support for high priority schools was addressed under the previous section, Component 4: Low Performing Schools.

With regard to school recognition, at the time of the review team visit, only one long-term national recognition program was operational in the state, although three were described—one recognition was being planned subsequent to the release of the January 2004 report card and the other program was terminated in 2002–03. The three programs are described below:

- 2003 AYP Recognition Award—a certificate is being sent to schools who made AYP by the President of the Michigan State Board of Education and Superintendent of Public Instruction in February 2004 following the release of the 2003 School Report Card.
- Michigan Blue Ribbon Exemplary Schools—This national program identifies and recognizes outstanding public schools across the state that provide a world class education. This program was initiated in 1982 and has recognized more than 350 successful schools since its inception. The purpose of the program is threefold:
  - (1) to identify and give public recognition to outstanding public and private schools that achieve to high academic standards or have shown significant academic improvement over five years;
  - (2) to make available a comprehensive framework of key criteria for school effectiveness that can continue to improve school quality; and
  - (3) to communicate best practices for educational success within and among Michigan schools.

The MDE Blue Ribbon Schools Program includes both schools that have demonstrated sustained success and those that have shown significant academic progress while overcoming serious educational obstacles. While the U.S. Department of Education eliminated the Blue Ribbon Schools Program in 2002 and replaced it with a new program focused entirely on test scores, the Michigan State Board of Education elected to maintain the original program. As a result,

Michigan's program is more rigorous and incorporates facets from both the Education YES!, accreditation system, and *No Child Left Behind*.

Eleven elementary schools were recognized in January 2003. In 2004, secondary schools will be recognized.

- Golden Apple and Governor's Cup Awards (program initiated by former Governor and ended in 2002)—The Golden Apple Award provided cash for teachers and principals of Michigan's high achieving and most improved elementary schools. The Governor's Cup Award was given to high schools that had the most Merit Award winners as well as those who lead in athletic conferences.

To date, other than the certificates recognizing schools which have made adequate yearly progress (AYP), the state has not made plans to initiate a formal state recognition program of distinguished schools as required by NCLB, nor "develop a system of recognition of schools which have significantly closed the achievement gap".

With regard to teacher recognition, the Michigan Department of Education has one of the most comprehensive Web site for teacher recognition opportunities that the CCSSO/MGT review team has seen. The Web site lists the array of educator recognition programs within the state, as well as national recognition programs for teachers.

To recognize Michigan teachers, the Department of Education has developed a strategic plan for awards and recognition programs which was presented to the State Board of Education. The 2003–04 goals in the strategic plan are to uplift the image of the teaching professional so as to:

- retrain and encourage quality teachers; and
- attract quality teacher candidates to the profession.

The major Michigan teacher recognition programs include:

- Teacher of the Year;
- Millen National Education Award; and
- Presidential Awards for Excellence in Science and Math.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATION**

- **The Michigan Department of Education has effectively implemented the Blue Ribbon Exemplary Schools Program.**
- **The Michigan Department of Education is commended for its comprehensive Web site on teacher recognition opportunities.**

## RECOMMENDATION

### Recommendation 5-1:

Implement a new awards program for high performing schools to take the place of the Golden Apple and Governors Award for exemplary schools. A new awards program should be created by the Governor, State Board of Education, and State Superintendent to recognize high performing schools as required by NCLB.

## **COMPONENT 6: STUDENT ASSESSMENT**

**Definition:** NCLB strengthens requirements for state assessments. By the 2005-06 school year, states must develop and implement annual assessments in reading and mathematics in grades 3 through 8 and at least once in grades 10-12. By 2005-06 states must develop challenging content and achievement standards in science and by 2007-08, states also must administer annual science assessments at least once in grades 3-5, grades 6-9, and grades 10-12. Each assessment must be aligned with state academic content in achievement standards and involve multiple measures, including measures of higher-order thinking and understanding. **(Title I, Part A, Section 1111)**

In general, state assessment systems must include the following:

- alignment with state academic content standards, and student academic achievement standards;
- inclusion;
- appropriate accommodations;
- adequate reporting systems;
- prompt dissemination of results; and
- participation in the National Assessment of Academic Progress (NAEP).

**Rubric Score: 2.5**

## FINDINGS

State assessment data must drive the accountability activities of states accepting Title I funds. These data and the process of collecting them are integral components of the overall implementation of NCLB requirements. As the primary source of information on student achievement and accountability plan effectiveness, quality student assessment is critical.

The Michigan Educational Assessment Program (MEAP) has been in existence since 1970. The Michigan Education Assessment Program (MEAP) was transferred from the Department of Treasury to the Michigan Department of Education (MDE) in late

December, 2003. While the overall MEAP oversight is currently located in the Department of Education, multiple units of state government are involved in the MEAP process. For example, MDE houses MEAP staff, the Merit Board and staff are in Treasury Department, the Department of Management Budget (DMB) houses the Center for Educational Performance and Information (CEPI) which collects student identification and other information, and the Department of Information Technology (DIT) is responsible for connecting software issues and developing new reporting software for the future (see Component 11 for additional findings and issues related to data management).

The current MEAS tests students in the following areas and grade levels:

- English/language arts and mathematics in January/February of each year for grades 4 and 7;
- science and social studies tests in grades 5 and 8 in January/February of each year;
- MI Access\* (Michigan's Alternate Assessment Program for students with disabilities) in the last two weeks of February through the end of March;
- MEAP high school testing in November & April/May for 11th grade; include content areas and
- students who have been in U.S. schools for three years or less, use the English Language Proficiency testing program currently in place in Michigan to determine whether ELL students should take the regular MEAP tests, with or without accommodations.

The Michigan Educational Assessment Program (MEAP) reports student achievement in the following four distinct proficiency levels:

- Level 1-Exceeded Expectations
- Level 2-Met Expectations
- Level 3-Basic
- Level 4-Below Basic (Apprentice)

Students in the exceeded or met expectations levels are considered to be proficient. The cut-off scores defining the four categories were determined and validated by a team of qualified national testing experts. This definition of proficiency is used to calculate Adequate Yearly Progress for English/language arts and mathematics at all three grade levels.

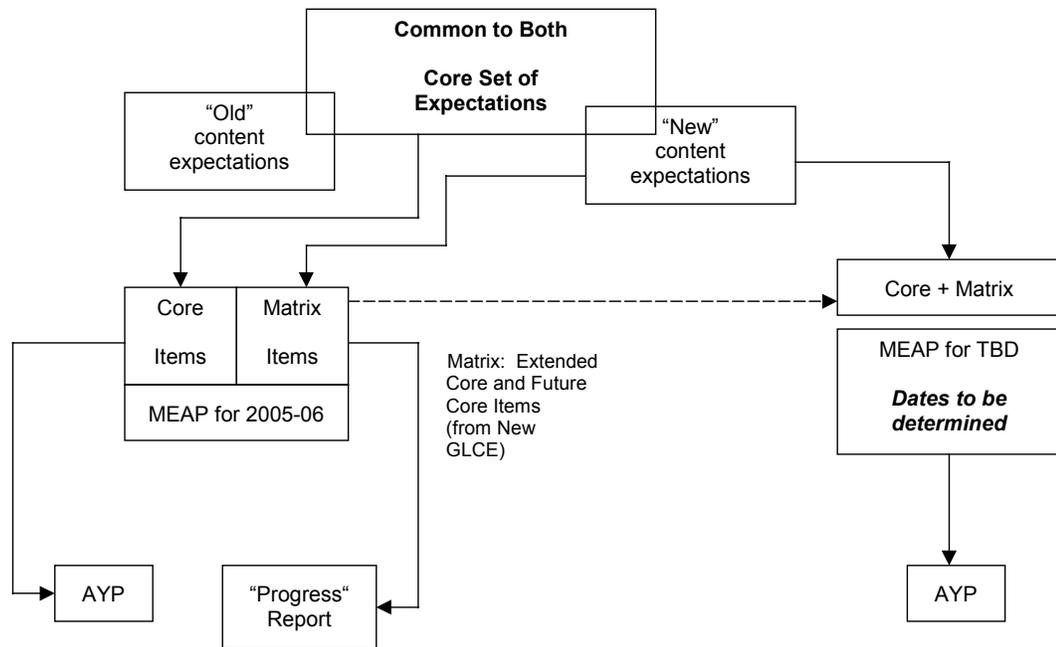
While the state has clearly defined four student achievement levels, the CCSSO/MGT consultant team found an instance where assessment scores are difficult to interpret. The writing rubric has six levels where the rating of 1 indicates the level needing the most improvement. This causes confusion when Level 1 means high on one standardized test and low on another. As misconceptions in the meaning of assessment results causes problems for MDE, this is an area of significant concern.

\*Refer to Component 14 for details related to Mi-Access performance categories.

Under NCLB, states have flexibility to join their current accountability system with the requirements of NCLB. Michigan has accomplished this as explained in Component 2 of this report. In addition to the MEAP, the state has an accreditation program called Education YES!. This program allows Michigan to continue using its current accountability design while integrating the AYP methodology into the existing system.

Exhibit 6-1 shows the process for the state’s integration of the previous content expectations and assessment with the new content expectations and assessment. By using this method of combining core and matrix items, students have the opportunity to make a smooth transition into taking the new assessments.

**EXHIBIT 6-1  
GRADE-LEVEL CONTENT EXPECTATIONS  
ASSESSMENT PICTURE**



Source: Michigan Department of Education, Office of School Improvement and the Office of Student Assessment, January 2004.

The Michigan Department of Education is working with a test development firm to revise the current MEAP and to transform it into a grade-level testing program (grades 3-8 and vertical equating for both MEAP & MI-Access) to be administered in the 2004-05 school year to comply with NCLB mandates. Michigan is also in the process of aligning new assessments with the new content level expectations. Mi-Access is also using extended GLCES when developing its grades 3-8 and 11 assessments. The new assessments will be piloted in the 2004-05 school year and will be officially implemented in the 2005-06 school year.

The National Assessment of Educational Progress (NAEP) is required of every state on a biennial basis beginning in 2002-03. Michigan continues to participate in all NAEP

sampling requests and uses the test as an accountability indicator. There is no legislative mandate to require schools to take the NAEP; therefore, some schools question if it is considered a “mandatory” test. Additionally, the state’s assessment tests have not been analyzed to determine what results will be produced from mandatory NAEP comparisons due to the lack of MDE staff to implement this function.

Staff in the MDE Office of Educational Assessment and Accountability have taken a proactive stand by self-identifying issues and problems in the MEAS. Among these are:

- delayed and sometimes inaccurate MEAP results;
- missing student tests;
- inaccurate demographics and a lengthy process to correct them;
- inaccurate and duplicative student IDs;
- many AYP appeals (based on inaccurate demographics);
- reporting tasks split among several vendors;
- computer programs not ready when needed;
- recent attempts of the state to bring Information Technology (IT) in-house have been problematic. DIT staff and software companies do not have the background in MEAP. Staff of Electronic Data System (EDS) have to be trained on MEAP and this is costly; and
- too few MEAP staff and difficulty in recruiting qualified staff given the disparity of state pay.

Other key issues involve the assessments for students with disabilities and those with Limited English Proficiency. (Note: These issues and accompanying recommendations can be found in Component 14).

Two indicators of successful implementation of the student assessment system under NCLB include that the state assessment system produces individual student interpretative, descriptive, and diagnostic reports, and that the state reports itemize score analyses to schools and districts. Michigan has begun this process, but the state is only in the infancy stages of implementation for these two indicators. For example, the state reports itemize score analyses to districts, but this is not being done at the school and classroom levels.

Additional assessment-related issues are apparent. Many parents, teachers, and community members believe the assessment results are not presented in a format that is clear and easy to understand. Since the last handbook (*A Guide to Using and Reporting Assessment Results*) was published in 1998, the state has not developed an updated handbook for teacher use in understanding the assessment results and how to interpret the results which they in turn could use to assist parents in understanding the results. Additionally, there has been no state-initiated Intermediate School District (ISD)

training conducted since 1979 in assisting district staff to understand the true meaning of school assessment data. It is reported that very little planning time has been devoted statewide for cross grade-level sharing of test results (i.e., the 3<sup>rd</sup> grade assessment results not being effectively shared with the K-2 teachers). Refer to Component 14 for more information on MI-Access.

The survey administered by the CCSSO/MGT team to senior state-level staff included several statements regarding the status of assessment as it relates to NCLB. Among the comments include:

*Our assessment system was developed, and shifting to a grade-level assessment system is causing great consternation at the district level.*

*I know that our state has already had trouble with matching test scores with individual students and districts/buildings due to technology glitches. Down the road, I think we may have trouble with monitoring requirements as we are very small state agency with limited resources. We are smaller than some intermediate school districts in the state with regard to employee numbers.*

When asked what the SEA's greatest strengths are with regard to the implementation of NCLB, there were also many positive remarks made regarding the state's assessment system including:

*We have a well established state student assessment program...*

*Traditionally we have been an "assessment" state, so we have an established system even though it did not cover all Grades 3-8.*

Seventy-seven (77) percent of the survey respondents believe that the state is in compliance or in the process of becoming compliant with the student assessment requirements.

In the past, the state has offered Test Wiz and D Tool as two applications for schools to be able to disaggregate MEAP achievement data. The D Tool was never finished and therefore never worked. Test Wiz is not sophisticated to the point in which the school/teacher can disaggregate data at the classroom and student levels, which are critical to improving professional development activities and ultimately improving student achievement. The state has, however, recently invested in an initiative called MI-Plan which is a Michigan's first Web-based school improvement planning and implementation tool. MI-Plan is available at no cost to schools, involves a partnership among MDE, CEPI, and DIT, and most, importantly provides a framework to develop a single plan for meeting requirements of NCLB, Education YES!, comprehensive school reform, annual reporting, and technology planning. MI-Plan assists the state and districts in ensuring the maximum coordination of efforts and resources. There still exists a need to find an appropriate and effective data analysis tool that brings student-level data to the classroom to inform instructional delivery and individualize student planning. This type of effort will ultimately be necessary for Michigan to meet the next steps in effective education reform and accountability. MI-Plan might provide the vehicle in which to develop a comprehensive data analysis tool.

The Director of the Office of Educational Assessment and Accountability has the in-depth knowledge, expertise, and extensive experience in understanding the changes that need to take place in order to address the issues listed above. He was hired in November 2003 and has made significant improvements in the office in a short period, including the immediate identification of issues that need to be resolved in testing and assessment functions. The CCSSO/MGT consultants reviewed the proposed changes and believe the recommendations are sound and needed in order to bring about reform in MEAS. The proposed changes include:

- return reporting functions back to the basic MEAP contract, so reporting is done in a timely manner;
- create an efficient way to identify students and keep track of their achievement data (review effective models from other states);
- secondary uses for MEAP results such as NCLB and AYP, and Education YES!, might be done by DIT, but only with performance contracts; and
- do not implement any innovation without first pilot-testing and having backups in place.

The Office of Assessment and Accountability has 12 staff and the director. Only two staff members are in test administration. Thirteen (13) positions out of a total of 29 budgeted positions are vacant. These positions has not been filled at the time of the on-site visit. It was noted that at least one position has not been filled due to the salary offered. No salary studies have been conducted (or planned) to address this issue. The Office of Educational Assessment and Accountability has been given permission to add two staff members to handle data issues related to accountability; however, these positions have not been filled.

In comparison, the state of Florida, with a total student enrollment of approximately two million compared to Michigan's 1.4 million, has a total of 50 employees in its Office of Assessment.

The leadership in the Office of Educational Assessment and Accountability contracted with outside, independent national experts to study the issues unique to Michigan and provide insight and potential recommendations for improvement in the state assessment system. The State Legislature recently discussed proposals to amend state law and eliminate the MEAS testing program in favor of national tests. After carefully studying the advantages and challenges of having custom-developed assessments as opposed to off-the-shelf assessments, the Michigan State Board of Education voted on January 13, 2004 to maintain the current custom-developed, standards-based MEAP. The State Board of Education supported keeping the MEAP since it "provides continuity and is aligned with Michigan's curriculum standards."

In the 2001 *Making Standards Matter* Report conducted by the American Federation of Teachers, it is reported that "Michigan's system lacks coherence—some tests are not aligned with the standards, some of the aligned tests are based on weak standards, and many of the curriculum components have not been developed for tested areas." The

report states that Michigan's standardized tests are not aligned with the standards, and that there is no basic curriculum in each of the aligned test areas. While the state has made great strides in developing strong curriculum components since this report was published in 2001, there still exist the need to align tests to all of the standards.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The new leadership in the Office of Educational Assessment and Accountability is commended for quickly identifying assessment issues and moving forward with a plan to address those issues.**
- **The Michigan Department of Education and the Center for Educational Performance and Information are to be commended for collaborating in the development and implementation of MI-Plan which is a technology-driven system that assists school districts in disaggregating their MEAP achievement data to assist in effective school improvement planning. (Note: MI-Access data will be included in MI-Plan in the future.)**
- **The Michigan Department of Education is commended for its combined core and matrix testing process to ensure that students have the opportunity to make a successful transition from testing students on the previous standards to the new standards. This matrix system allows districts and teachers to have adequate time to implement curricula, professional development, and intervention systems.**
- **The Michigan Department of Education is commended for hiring outside independent national assessment experts to assist in making research-based student assessment program decisions.**

### **RECOMMENDATIONS**

#### **Recommendation 6-1:**

**Begin implementing the new director's strategic plan. The key components of this plan include the return of the reporting functions back to the basic MEAP contract so reporting is done in a timely manner; create an efficient way to identify students accurately and keep track of their achievement data (review effective models from other states); ensure that secondary uses for MEAP results, such as NCLB and AYP, and Education YES! are transferred to DIT, but only with performance contracts; and do not implement any innovation without first pilot-testing and having a backup system in place. (See component 14 for recommendations related to MI-Access.)**

**Recommendation 6-2:**

**Develop quality assessments based on the new standards and ensure that school and district-level staff are an integral part of identifying the core standards to be tested. It is critical that MDE gain systemwide buy-in and collaboration in assessment issues to promote effective coordinated implementation.**

**Recommendation 6-3:**

**Create statewide criteria that a school/district should consider when purchasing any instructional or testing programs to ensure the alignment with the state's standards and assessments. Statewide alignment of instruction is necessary to promote effective standardization of assessment results and related data quality.**

**Recommendation 6-4:**

**Continue to investigate and evaluate data analysis tools to ensure school improvement plans are data-driven and promote student achievement for each student in the state of Michigan. School improvement plans are the local manifestation of statewide policies and the most critical tool for the implementation of state standards and initiatives.**

**Recommendation 6-5:**

**Create a legislative mandate regarding mandatory NAEP testing and begin analyzing state assessment to determine what results will be produced from mandatory NAEP comparisons. NAEP is the best source of nationwide education performance data for comparison. From these test data, Michigan can gain a valuable perspective on how its students are performing in comparison to the rest of the country.**

**Recommendation 6-6:**

**Employ needed staff to meet Department manpower needs and comprehensively document difficulties in staffing if unable to employ qualified personnel. MDE must have the capacity of effectively responding to student assessment responsibilities. The potential consequences for falling short on required assessment tasks are significant and should be guarded against.**

**Recommendation 6-7:**

**If unable to employ qualified staff, request a position analysis and salary study be completed to ensure the Department's ability to successfully employ needed personnel. This recommendation is critical to build needed documentation as the rationale for budget requests.**

**Recommendation 6-8:**

**Revise the scoring rubrics to ensure consistency and reduce confusion in rating scales. There must be clearly defined procedures for scoring state assessments used for accountability purposes.**

**Recommendation 6-9:**

**Update and publish the handbook, *A Guide to Using and Reporting Assessment Results*, to ensure all stakeholders understand and utilize data to make curriculum decisions. This action could do much to promote effective use of Michigan assessment data in the overall effort to reach student performance goals.**

**COMPONENT 7: TEACHER QUALIFICATIONS**

**Definition:** States must develop plans with measurable objectives that will ensure that all teachers of core academic subjects are highly qualified. “Highly Qualified” is defined as holding state certification (alternative state certification is acceptable), holding a bachelor’s degree, and having demonstrated subject area competency. Core academic subjects include English, reading or language arts, mathematics, science, foreign languages, civics and government, economics, arts, history, and geography. All newly hired teachers in Title I programs after the start of the 2002-03 school year must meet these requirements. Additionally, all existing teachers must meet these requirements by the end of the 2005-06 school year. School districts must use at least five percent of Title I funds for professional development to help teachers become highly qualified. (Title I, Part A, Subpart 1)

**Rubric Score: 3.5**

**FINDINGS**

The NCLB requirement for all teachers to be “highly qualified” is challenging all states to meet personnel needs in this area. Many states already have difficulty filling teaching positions with certified staff and this component of NCLB makes this task even more challenging. Michigan is one state that has taken a proactive approach to teacher qualification efforts.

Michigan has made an extensive effort to review its state certification requirements to ensure compliance with the NCLB, to modify requirements when appropriate, and to disseminate information on updated requirements to teachers around the state. These efforts include:

- **The Report of the Ensuring Excellent Educators Task Force** (April 11, 2002) Although this Task Force was created prior to the implementation of NCLB in Fall 2001, its report incorporates several requirements of NCLB and its five goals reflect the need for the state to meet federal standards. These Task Force goals include:

- **GOAL 1** Improve teacher preparation and the induction and mentoring of new teachers.
- **GOAL 2** Attract and retain high quality teachers, particularly where they are needed the most—in underperforming schools and districts.
- **GOAL 3** Reorient teacher professional development, supporting policies and practices that increase student achievement.
- **GOAL 4** Build collaborative partnerships and shared responsibilities among K-12 educators, higher education, business, community groups, and others that support higher quality teachers and teaching.
- **GOAL 5** Elevate the profession of teaching and the image of teachers, including the recruitment of teachers and career enhancement.

As an example of an action plan to support the goals, the policy action to achieve Goal 1 is to:

*Approve a new state data-based institutional accountability system for teacher preparation institutions that publicly shares data and information on the performance of teacher candidates, and the satisfaction of graduates and employers.*

- **The Michigan Definition for Identifying Highly Qualified Teachers** (April 24, 2003) This document was created by the Department of Education with broad involvement of Michigan evaluators. The document describes the current state certification system, and the modifications needed to comply with the NCLB. For example, individuals who hold old K-8 "all subjects" designation on their elementary teacher certificate will need to meet one of several options to become "highly qualified."
- **Highly Qualified Teachers Questions and Answers** (December 2, 2003) Prepared for administrators and teachers on Michigan's highly-qualified teacher "definition" – available on both the Michigan Education Association (MEA) and MDE Web sites.
- **What Every Michigan Teacher Should Know About NCLB** Created by MEA on its Web site and disseminated to teachers throughout the state.

- **Michigan Highly Qualified Teacher Worksheet** (How Do I Know If I am Qualified? Revised 10/15/03). Created by MEA to provide a worksheet for teachers to determine if they meet new requirements.
  
- **The Michigan Highly Qualified Teacher Content Area Portfolio Guidelines** (January 9, 2004). The guidelines were developed as a high objective uniform state-standard of evaluation (HOUSE). The system is designed to award teachers for their years of teaching, academic preparation in the content, service to the profession, and professional development. A teacher who selects the portfolio assessment option must have the portfolio reviewed by the local professional development assessment team/school improvement team. It is a local decision to determine the appropriate composition of the local assessment team. The assessment team must determine the teacher's subject matter content competency based on the Michigan portfolio guidelines.

The teacher must demonstrate competency in each of the following categories:

- years of successful teaching experience based on local evaluation;
- college level coursework in the content area;
- service to the content area; and
- content specific professional development activities.

The content specific professional development activities section of the portfolio must include a reflection on how the combination of professional activities has been translated into improvement of teaching practice and/or classroom instructional strategies.

The portfolio, the team assessment, and the portfolio assessment report must be filed with the local district by June 30, 2006.

- Efforts made by the Michigan Department of Education to Promote Highly Qualified Status (Presented to State Board of Education January 9, 2004)

This State Board of Education presentation outlines several strategies used by the Department of Education to assist school districts to comply with NCLB, including regional meetings (which over 800 educators attended), presentations at Fall 2003 conferences, workshops, a proposal to waive teacher certification fees for experienced teachers to take the test, grants to universities to improve teacher education programs, and the development of the

teacher portfolio process as an option for teachers to demonstrate competence as a highly qualified teacher.

Each of the above efforts demonstrate a strong commitment of the Michigan Department of Education to meet the challenges of *No Child Left Behind*.

The above documentation clearly shows that the State of Michigan has met the NCLB indicators for success in the following areas:

- The teacher certification system has been evaluated to provide the necessary changes required by new federal legislation.
- Teacher certification standards for middle and high school grades require advanced knowledge or a graduate degree and education in subject content.
- Minimum subject content education standards have been set for all teaching levels. Teacher evaluation standards are aligned with state academic content and student achievement standards.
- Teacher certification tests assess mastery of rigorous subject matter standards.

On April 11, 2002 the State Board of Education approved the following policies on “Ensuring Excellent Educators”. These include:

- A new state data-based institutional accountability system for teacher preparation institutions that publicly shares data and information on the performance of teacher candidates, and the satisfaction of graduates, employers, and other stakeholders will be developed.
- A standards-based induction period for teacher licensure, including pay and quality incentives for induction and mentoring will be developed and implemented.
- High quality content and performance standards for alternative pathways and models for teacher preparation will be developed and implemented.
- Standards for effective professional development based on defined plans for instructional improvement will be developed and implemented. It will further require the completion of a practice-based professional development plan based on performance standards as a condition for certificate advance and renewal.
- Collaborative partnerships between and among the State Board, the Legislature, Governor, other state agencies, institutions of higher education, community colleges, local education agencies, intermediate school districts, and relevant professional organizations

to ensure the provision of comprehensive academic and practical programs/experiences for teacher development will be developed.

- A public effort to support teaching as a profession and to enhance the image of teachers will be collaboratively developed by the State Board, the Department, and other stakeholders.

In spite of the numerous efforts being taken by the state to promote high quality teachers, the administrative rules governing the certification of Michigan teachers have not been updated to include NCLB requirements. The administrative rules were last revised in August 1988. (Note: The rules are currently under revision and the first draft should be ready by June 2004).

The Michigan Department of Education does not have any incentive program to attract prospective teachers, nor is the Department actively engaged in recruitment efforts. While some teacher strategies exist in urban areas, the state colleges of education graduate about 7,000 new teachers a year which is sufficient for most areas of the state. The state, however, has provided funding to Wayne State University to assist in increasing the number of teachers available in Detroit Public Schools.

The Office of Professional Preparation Services (OPPS) is responsible for answering questions for educators about “high quality” status. The office estimates that they receive over 100 phone calls and 200-300 e-mails per week. Presently, only two administrators—the State Office Administrator for Professional Preparation Services and the Education Consultant Manager—can answer questions regarding NCLB teacher qualifications; others have not been trained to do so. Field Services representatives are also trained to respond to NCLB questions, but most phone calls come to OPPS.

NCLB requires that teacher qualification information can be reported through the state data infrastructure. The Registry of Educational Personnel(REP), developed by CEPI, provides the fields for the state to meet this requirement. As will be addressed in Component 11, Data Management, OPPS continues to have problems obtaining accurate data from school districts.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The Department of Education is commended for its extensive efforts to comply with the NCLB requirements for highly qualified teachers.**
- **The Wayne State University teacher incentive program has the potential to provide additional highly qualified teachers to Detroit Public Schools.**

## RECOMMENDATIONS

### Recommendation 7-1:

**Cross-train teacher certification staff.** In addition to the two administrators in Office of Professional Preparation Services (OPPS), other OPPS staff should be trained to answer e-mail and phone call questions regarding high quality teachers and NCLB requirements. The search for highly qualified teachers demands that, at minimum, prospective teachers get comprehensive NCLB-related information when contacting the Michigan Department of Education.

### Recommendation 7-2:

**Update administrative rules governing the certification of Michigan teachers.** These rules were last updated in August 1988 and do not include NCLB requirements. Process related to teacher certification must be comprehensive and precise to ensure effective compliance with NCLB certification requirements.

### Recommendation 7-3:

**Work with CEPI and school districts to resolve the data collection issues associated with the Registry of Educational Personnel (REP) System.** (Note: Several recommendations regarding data management issues are presented in Component 11). MDE must have access to quality comprehensive data on who is working in Michigan schools to effectively analyze, monitor, and ensure that schools are staffed with highly qualified teachers.

### Recommendation 7-4:

**Ensure that the standards for measuring competencies from the HOUSE portfolio are objective and uniform, as required.** Through training and technical assistance, the Michigan Department of Education must ensure that the portfolio development process is rigorous—with objective and uniform standards as required by NCLB for all teachers.

## **COMPONENT 8: PARAPROFESSIONAL QUALIFICATIONS**

**Definition:** Paraprofessionals in Title I programs must have at least two years of postsecondary education or, for applicants with a high school diploma, demonstrate necessary skills of a formal state or local academic assessment. Additionally, all paraprofessionals in Title I programs must hold a high school diploma or its equivalent. All new hires in Title I programs as of January 2002, must meet these standards; existing paraprofessionals have four years from January 2002 to comply with the new requirements. However, these requirements do not apply to paraprofessionals used for translation or parent involvement. **(Title I, Part A, Subpart 1)**

The law also specifies that paraprofessionals may not provide instructional support services except under the direct supervision of a teacher.

**Rubric Score: 3.5**

## **FINDINGS**

Paraprofessionals are central to the effective implementation of instructional strategies and academic standards in public schools. New NCLB requirements significantly increase the certification standard for personnel in these positions. All paraprofessionals hired after January 2, 2002 must already meet NCLB requirements as a condition of employment, while those paraprofessionals hired prior to January 8, 2002 have four years or until January 8, 2006, to meet NCLB requirements. Some Michigan school districts are requiring all paraprofessionals to be highly qualified, regardless of their assignment.

Several commercial tests have been developed to address the areas in which paraprofessionals must be assessed. Most of these assessments are taken in one sitting under timed conditions, which may introduce an element of test anxiety for some test takers, since a paraprofessional's continued employment may depend on the outcome of the test. The Michigan Department of Education (MDE) has determined that paraprofessionals can reach highly qualified status by successfully passing the *Basic Skills Test of the Michigan Test for Teacher Certification (MTTC)* or ACT WorkKeys Proficiency Certificate for Teacher Assistants (PCTA). In addition, the consultant team found that the MDE is in the process of norming another test for paraprofessionals through Educational Testing Service (ETS). This additional assessment should be available for paraprofessionals in 2004.

In addition to test taking issues, as the deadline approaches, the options of earning an associate's degree or completing two years of college (60 college credits) can become difficult for those paraprofessionals who are employed full time and who do not have the time nor resources to pursue a college education. Therefore, the Michigan Department of Education (MDE) has focused on a local, rigorous assessment option as an alternative vehicle for paraprofessionals to meet the NCLB deadline of January 2006.

The MDE has also developed a framework for a portfolio assessment that can be used as a rigorous, local assessment to meet NCLB paraprofessional requirements. The portfolio assessment for currently employed paraprofessionals focuses on a paraprofessional's ability to assist Title I students. The paraprofessional constructs a portfolio around identified needs, the needs of the students they assist, and the district and teachers they support. The focus for the portfolio is on the content areas defined in the NCLB legislation: reading, writing, and mathematics.

A district review committee is established to affirm that paraprofessionals submitting completed portfolios have met the necessary requirements. Either a Continuing Education Committee or a Paraprofessional Education Committee can meet this purpose.

In the portfolio process, a paraprofessional develops a portfolio that demonstrates his/her content area knowledge. A point system is used to satisfy the NCLB requirements. The elements of the portfolio are listed below.

- ***Demonstration of Content Area Knowledge:*** NCLB focuses on three areas for the basis of assessment: reading, writing and mathematics. Therefore, the portfolio assessment focuses on assisting with the instruction of the above-mentioned content areas and activities completed for the portfolio should be distributed throughout these content areas.
- ***Professional Development:*** Paraprofessionals may participate in professional development activities to accumulate the required 60 portfolio points. To assist paraprofessionals with meeting this professional development requirement, the Michigan Department of Education encourages districts to develop a professional development plan based on the reading and writing subject areas. Expanding the number of professional development activities open to paraprofessionals is a viable opinion. Paraprofessionals may also receive professional development through community colleges, community adult education programs, Intermediate School Districts (ISDs), state organizations/associations, and other relevant opportunities.
- ***Qualified Colleague:*** The participating paraprofessionals work with qualified colleague(s) who assist with the assessment process. The paraprofessional and qualified colleague establish a formative relationship that is collaborative, collegial and confidential in nature, with the primary goal that the qualified colleague will provide support and guidance throughout the assessment process. A qualified colleague may be a teacher, NCLB qualified paraprofessional, or administrator.
- ***Professional Dialogue/Observation:*** Through conferences, collaborative sessions, and observations, a paraprofessional must demonstrate the completion of the portfolio process and how it enhances his/her understanding of instructional support. The paraprofessional meets periodically with the qualified colleague to review the contents of the portfolio, discuss progress to date, and other relevant issues.

## COMMENDATIONS AND RECOMMENDATIONS

### COMMENDATION

- **The Michigan Department of Education is commended for its exemplary portfolio program designed for paraprofessionals to meet NCLB requirements.**

## RECOMMENDATION

### Recommendation 8-1:

**Design and implement a comprehensive training program for administrators, teachers, and others to serve as mentors (qualified colleagues) to assist paraprofessionals in portfolio development.**

## **COMPONENT 9: READING FIRST/EARLY READING FIRST PROGRAMS**

**Definition:** NCLB supports scientifically-based reading instruction programs in the early grades under the Reading First Program and in preschool under the Early Reading First Program. Funds are available to states to apply for this grant to help teachers strengthen previous skills and gain new ones in effective reading instruction. **(Title I, Part B, Subparts 1 and 2)**

**Rubric Score: 3.5**

## FINDINGS

Early reading and literacy intervention is an effective strategy to promote future student achievement and is an important part of overall NCLB implementation. Federal Reading First grants are viewed by many educators as a positive step in promoting literacy and reading proficiency nationwide. Presently, Michigan's approach to implementing the NCLB requirements related to Reading First is detailed and effective.

Michigan has a comprehensive Reading First Program and was the first state in the nation to fund individual subgrants to school districts. Michigan was also one of only three states in the country to implement components of Reading First before 2003. As a result, the Michigan Reading First Program was able to submit a full report to the USDOE in 2003.

By all accounts, *Making Reading First in Michigan*, is effectively managed and is a central component of Michigan's overall reading/literacy focus. In fact, 72 percent of senior leadership staff reported that they felt that the implementation of *Making Reading First in Michigan* would benefit students. When asked about Reading First compliance readiness, 82 percent of state education leaders responded that the program is already in compliance with the requirements of NCLB. Clearly, the implementation of Reading First in Michigan has been successful to date, and the consultant team was able to find many examples of support for and confidence in this program within the Department of Education.

The state plan for *Making Reading First in Michigan* details a process that is focused and uses multiple state and local resources to improve student reading proficiency. Michigan uses a two-tier approach to address reading proficiency within the state.

- **Michigan Reading Leadership Team** – The Michigan Reading Leadership Team develops policy and procedures for addressing reading/literacy issues in the state. This team also oversees all reading initiatives implemented in Michigan.
- **Michigan Reading First Management Team** – The Michigan Reading First Management Team oversees the implementation of the Reading First component of Michigan’s reading/literacy plans. This team develops Reading First policies and monitors Reading First implementation activities within the state.

The Michigan Reading First Management Team supports the state’s Reading Leadership Team through a system of Reading First Facilitators, Regional Literacy Training Centers, and programmatic technical assistance efforts. Reading First plans also include professional development activities for schools receiving Reading First subgrants as well as non-Reading First schools statewide.

Michigan Reading First staff have developed the *Best Practice/Keys to Success in Michigan Reading First Buildings and Districts*. This document summarizes state guidelines for the successful implementation of Reading First. Strategies for success are separated into four categories.

- district – whole school districts implementing Reading First
- central office – administration of Reading First
- principals – school-level implementation
- coaches and facilitators – providing Reading First Support.

Twenty-six (26) Reading First Facilitators provide technical assistance and monitoring services to the state’s 119 total Reading First schools. Michigan Reading First staff maintain a comprehensive schedule of implementation monitoring activities and produce detailed performance reports based on data collected. Much of these data are collected and analyzed by the University of Michigan with which Reading First staff have developed a beneficial working relationship. Each participating school has a Literacy Coach on site to guide the implementation of Reading First activities. Schools selected for Reading First subgrants must demonstrate progress within two years or face removal from the program. CEPI provides secure, continuous data access to the evaluators from the University of Michigan and adds new schools or data when requested by the Reading First Program Office.

Research-based instructional materials used in Reading First schools are approved by the MDE before being used in participating schools. Each vendor providing research-based instructional materials must also make available at least 50 hours of professional development in the use of approved materials. Michigan uses a research-based coaching model that focuses on adult learning to facilitate statewide professional development. In addition, MDE staff have developed quality professional development and training activities and materials to support the implementation of research-based instructional materials. Reading First staff have developed a training schedule that provides many opportunities for statewide improvement in reading instruction under the *Making Reading First in Michigan*.

*Making Reading First in Michigan* is a vital component of the overall state reading focus. In addition to Reading First, Michigan has implemented other programs partially or wholly designed to improve K-3 reading achievement within the state. These programs include:

- ***Education YES!*** – Michigan’s accreditation program includes reading standards that compliment those set forth by Reading First. Michigan’s Reading First grant application states that these two programs are aligned to promote grade-level proficiency in reading statewide.
- ***Michigan State Board of Education’s Goals for Special Education*** – Michigan has implemented a strategy to reduce the number of special education referrals based on reading difficulties. This strategy is based on research that supports the notion that reading interventions in the primary grades can reduce such referrals.
- ***Michigan State Board of Education Strategic Goals and Initiatives*** – The state board has adopted five strategic goals that are cited as integral to *Making Reading First in Michigan*:
  - ensuring excellent educators;
  - elevating educational leadership;
  - embracing the information age;
  - ensuring early childhood literacy; and
  - integrating communities and schools.
- ***MI CLiMB*** – In Spring 2002, Michigan initiated a program to assist classroom teachers in standards-based instruction and assessment focused on reading and literacy.
- ***Michigan’s Reading Plan*** – This initiative provides child development kits, literacy assessments, literacy progress monitoring, and a literacy summer school program to improve early childhood literacy.
- ***Teacher Preparation*** – Michigan’s teacher preparation program requires aspiring teachers to pass the Basic Skills Test, complete all required teacher preparation courses, and pass the Michigan Test of Teacher Certification. Reading instruction is an integral component of these certification activities.

These, as well as other reading initiatives implemented in Michigan, assist *Making Reading First in Michigan* a success in improving early childhood literacy throughout the state. The Winter 2003 MEAP testing results show that 75 percent of 4<sup>th</sup> grade students and 61 percent of 7<sup>th</sup> grade students scored in the satisfactory or higher ranges of the MEAP reading tests.

Early Reading First Grant funds are not managed by the Michigan Department of Education, but rather dispersed directly to Michigan school districts from the USDOE. As a result, MDE staff do not regulate or monitor Early Reading First activities among the school districts.

In reviewing the current status of Reading First in Michigan, we identified several challenges to full implementation. These include:

- **School Administrative Leadership** – School administrators in Michigan’s Reading First schools have a very challenging job. Low-performing schools typically face a myriad of academic and environmental difficulties that may take focus away from the importance of early reading instruction. Additionally, administrators often lack a comprehensive knowledge of reading instruction, limiting their ability to drive Reading First initiatives.
- **Access to Large School Districts** – Reading First staff often have difficulty supporting the larger Michigan school districts due to access problems created by bureaucratic processes. Reading First facilitators often cannot get to Michigan students most in need of reading support because of “turf” issues in some large school districts. For example, the Detroit City School District has been the source of significant challenges in the implementation of Reading First requirements.
- **Funding Dispersal in Large School Districts** – Roadblocks exist in some large school districts that keep all Reading First funds from getting to students targeted by the program. There are situations where it appears that Reading First funds are used for purposes other than those intended by the state program.
- **Vendor Quality** – *Making Reading First in Michigan* has experienced a mixed quality of instructional material vendors. At least one major vendor has provided poor service and training in research-based instructional materials used in Reading First schools.
- **Human Resources** – There are limited staff available to fully implement Reading First throughout the state. A significant amount of technical assistance and monitoring must take place for Reading First activities to realize maximum success.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The Department of Education has developed a detailed Reading First Plan for addressing reading improvement and implementing Reading First in Michigan.**

- The Department of Education was proactive in the implementation of Reading First, having been the first state to fund individual subgrants.
- The accelerated implementation of Reading First in Michigan has allowed the state to collect valuable performance data and submit a full report to the USDOE. Access to these data places Michigan ahead of most states in the ability to assess programmatic performance presently and over time.
- The use of Reading First Facilitators and Literacy Coaches is an effective capacity-building model that promotes programmatic quality and self-sufficiency.
- The Department of Education uses a research-based coaching model to improve the competencies of local staff implementing Reading First in Michigan.
- Effective professional development materials and activities have been developed and are used to build capacity at the district and school levels.
- Reading First staff have developed effective implementation and performance monitoring processes as well as detailed performance reports.
- Reading First in Michigan has developed a working relationship with the University of Michigan in which university researchers collect and analyze critical Reading First data.

## **RECOMMENDATIONS**

### **Recommendation 9-1:**

Explore ways to bring senior school district staff into professional development activities for Reading First. It is essential that these local leaders are aware of the potential impact of Reading First activities and are educated in strategies used to develop reading proficiency and literacy in Michigan. Self-assessment results show that senior DOE staff overwhelmingly support Reading First and this state-level commitment should be transferred to district and school leaders.

### **Recommendation 9-2:**

Increase senior DOE communication with Michigan school districts on the importance of accepting Reading First support and the requirements of participation. Some Michigan school districts, particularly some large districts, are creating roadblocks to successful implementation of this critical program. This situation may require the direct attention of the State Superintendent and Assistant Superintendents to resolve.

**Recommendation 9-3:**

Adopt an expanded utilization of distance technology to increase capacity in the implementation of Reading First in Michigan. Shortfalls in human resources can be effectively addressed using technology solutions, many of which are already available in most schools. Often, a one-time technology expense can reduce the need for multiple travel expenses, especially in remote areas of the state. One example of effective technology use is the extensive Reading First electronic database that allows electronic information to be accessed and shared.

**Recommendation 9-4:**

Expand MDE monitoring of current instructional material vendors and refine the selection process regarding new vendors. Previous difficulties with vendors should be reduced by intensifying current monitoring activities and revisiting vendor selection processes. In addition, an overall expansion of approved vendors may improve current vendor performance by creating additional competition for Reading First funds. Recent MDE actions in this area have produced improvements in vendor service that should result in overall programmatic improvement.

**COMPONENT 10: TRANSFERABILITY**

**Definition:** NCLB allows for the transferring of certain funds to programs and activities that have proven to be the most effective. This provision allows states to transfer up to 50 percent of funds it receives for state-level, non-administrative activities among the following programs:

- Improving Teacher Quality State Grants
- State Grants for Innovative Programs
- Safe and Drug-Free Schools and Communities State Grants
- 21<sup>st</sup> Century Community Learning Centers

The law also allows a state to transfer up to 50 percent of the funds it receives from these programs to carry out Title I, Part A activities. However, no Title I funds may be transferred to other programs. **(Title VI, Part A, Subpart 2)**

**Rubric Score: 1\***

**FINDINGS**

Transferability options under NCLB provide considerable flexibility to move federal funds into other effective Title I initiatives. However, this provision of the legislation diverges

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\* A rubric score of one in the area of transferability should not be interpreted as a negative as it is an optional requirement. The state has examined the concept and chosen to defer action until the issue is examined further after a year's time.

from previous federal policies and is, perhaps, the most misunderstood and overlooked portions of NCLB to date. Many states have not utilized transferability options and have chosen to focus on what is perceived to be more critical NCLB requirements.

The CCSSO/MGT consultant team found that Michigan has chosen not to exercise the transfer flexibility provisions of NCLB at the time of this review. Rather, the state has chosen to defer activity until such time as they have data on the initial results and the impact of certain programs and have the opportunity to convene a task force to discuss transferability options.

The team found that state leaders believe that, at the district and school levels, there are too many restrictions that will not allow the transferability of funds. At the state level, the staff interviewed could not identify initiatives that would be suitable for use through the transferability of funds provisions. One interviewee stated that the state used to be involved with Ed Flex; however, it expired and, due to time constraints, the state of Michigan did not reapply. It was reported that the decision not to apply was because the state had very few requests under the old Ed Flex; the new requirements did not appear to provide any more flexibility than is currently provided in the state and required a good deal of additional work on the part of state staff to work with a small cohort of pilot districts. The Office of Field Services has hosted workshops with several districts regarding Title VI: Flexibility and Accountability Funding Transferability and Small Rural School Achievement Programs, but no activities regarding the state's use of transferability of funds have occurred.

Indications were found that, as separate programs, Title II, Title III, Title IV, Parts A and B, and Title V targets funds to where the greatest need exists, and that Title I schools are frequently the beneficiaries of these program dollars. Targeting these program funds based on actual need may prove to be a more effective use of federal dollars rather than simply providing Title I schools more funds. Nevertheless, no evidence was provided to either support or reject current positions on the funding issue. Additionally, the team found no methods for establishing priorities for targeting funds to specific programs or areas within programs.

The lack of action on the issue of transferability may stem from the finding that evaluative data on program effectiveness are currently either lacking or inadequate, and cannot be used to base funding decisions. The consultant team did find some current evaluations being conducted at the state level. For example, a comprehensive evaluation on *Implementing Comprehensive School Reform: Lessons from Michigan's Statewide Evaluations, 2001-02* is a thorough review of Michigan's CSR schools. Additional comprehensive evaluations need to be conducted to assist the state in eliminating initiatives that are not showing progress, and study the feasibility of transferring the funds to more successful, researched-based programs with a strong evaluation component.

An additional reason the state may not be taking advantage of the transferability of funds option is the lack of understanding and knowledge regarding this option. CCSSO/MGT survey results show that 45 percent of the respondents did not know if the SEA is currently utilizing the transferability option as outlined in NCLB.

## COMMENDATIONS AND RECOMMENDATIONS

### RECOMMENDATIONS

#### Recommendation 10-1:

Adopt a target date for final determination of decisions to implement the transferability provision of NCLB. It is clear that Michigan has an opportunity to use the transferability option to promote student achievement, and the focused use of funding can be a powerful school improvement strategy.

#### Recommendation 10-2:

Develop criteria that may be used to determine priorities for assignment of supplemental funds to programs to determine transferability needs. This process should include comprehensive analyses of programmatic performance-based on detailed effectiveness data.

#### Recommendation 10-3:

Develop and implement a formal program evaluation plan that includes the collection of detailed programmatic data. This evaluation plan is needed for Michigan to determine where transferable funds should be spent to realize maximum performance impact. Longitudinal performance data will allow Michigan to identify trends that will assist in making improved decisions on programmatic funding.

#### Recommendation 10-4:

Establish protocol for monitoring the progress of program evaluation implementation. A cyclical and sustainable evaluation effort should be established through careful monitoring to promote overall programmatic effectiveness and transferability funding efficiency.

### **COMPONENT 11: DATA MANAGEMENT**

**Definition:** The NCLB data management indicators are designed to help state education agencies understand the business functions that support good data management and areas in need of improvement. The major principle that underlies these indicators is— data are an asset to SEAs and they are essential for addressing NCLB requirements. Additionally, good data can help improve instruction and, therefore, is very important to SEAs. Since responding to the NCLB requirements necessitates that SEAs first consider existing data in addition to possible additions, these indicators are written to broadly address data management as it relates to the entire data resource at a state education agency. **(All provisions of NCLB are supported by effective data management)**

**Rubric Score: 1.5**

## **FINDINGS**

The Michigan Department of Education (MDE) is currently experiencing the results of a state realignment that separated data management responsibilities related to education. Historically, MDE had responsibility for collecting, processing, and reporting educational data as well as having internal Information technology staff to support these activities. However, a series of policy shifts at the state level have dramatically changed this structure. Currently, educational data are collected and processed by the Center for Educational Performance and Information (CEPI) within the Department of Management & Budget (DMB), educational data are reported by MDE, and information technology services are provided by the Department of Information Technology (DIT).

Educational data in Michigan are collected at the district level and compiled by CEPI for processing and analysis. State legislation passed in Fall 2003 made CEPI the sole collection source for all educational data used by the state. These data include not only what are mandated by state and federal statutes, but also all other data used for additional applications by MDE.

All education data are collected using a system of data sets comprising the Michigan Education Information System (MEIS). The School Code Master (SCM) is the state of Michigan's database of school directory information. This directory links individual MEIS data sets together. The data maintained in the SCM are used for mandated data submissions to the state and federal government, and are critical to fulfilling the reporting requirements of NCLB and Education YES!

The Center for Educational Performance and Information (CEPI) also maintains five additional data sets developed from MEIS data. These include:

### **(1) Single Record Student Database**

Data submitted by school districts via the Single Record Student Database (SRSD) include discrete information about individual students such as age, gender, race and ethnicity, and program participation. The data collected via the SRSD are used to meet the reporting requirements of the federal NCLB, including the determination of Adequate Yearly Progress (AYP).

### **(2) Registry of Educational Personnel**

Data submitted by school districts via the Registry of Educational Personnel (REP) are used to produce reports for the U.S. Department of Education and for the state of Michigan regarding school personnel. Additionally, REP data are provided to the Michigan Department of Education for teacher certification and high quality teacher information.

### **(3) School Infrastructure Database**

Data submitted by school districts via the School Infrastructure Database (SID) include information about safety practices and incidences of crime in public schools, Title I schoolwide programs, and dual enrollment. The SID also has the capability to include information about technology (hardware, networks, connectivity, distance learning, etc) and school structure (physical construction, capacity and use elements). However, data

regarding technology and school structure are not required by the state nor federal government, and therefore, are not collected at this time.

**(4) Financial Information Database**

Data submitted by school districts via the Financial Information Database (FID) include information from district annual financial reports, balance sheets, revenues, district expenditures, and school expenditures. In order to submit data via the FID, school districts must be in compliance with the Michigan Public School Accounting Manual Chart of Accounts.

**(5) Student Test and Achievement Repository**

The Student Test and Achievement Repository (STAR) database is under development in cooperation with MDE and will contain student, school, and district performance data (MEAP, GED, Advance placement scores, ACT, PSAT results, etc.). School districts are not required to submit these data to the Center for Educational Performance and Information (CEPI). CEPI will obtain these data from vendors managing performance data for the state and/or federal government.

The CCSSO/MGT consultant team found that the responsibilities of CEPI related to NCLB include the following:

- **Collection of Data** – As the mandated source for all Michigan educational data, the actions of CEPI are critical to the successful reporting of NCLB data. Data must move through CEPI quickly and accurately to serve the reporting and planning needs of MDE.
- **Quality of Data** – The accuracy and completeness of Michigan school and school district data collection and submission have been ongoing problems for MDE. In addition to the responsibilities held by the local school districts for data quality, CEPI conducts data quality monitoring and cleaning activities. CEPI and MDE must work together to ensure the validity, accuracy, and reliability of current educational data and in comparison to previous years. The longitudinal aspects of NCLB accountability measures make this responsibility critical to the overall success of the Department's school improvement and compliance efforts.
- **Data Reporting** – Many state and federal reports must be managed by MDE and CEPI. Clearly defined roles and responsibilities in this area are essential to the production of timely and accurate reports. In addition to mandated reports, there are numerous other analyses needed in a timely manner by MDE to facilitate comprehensive systemic and programmatic planning.
- **Policy Advising** – The holders and processors of educational data must be involved with decisions that are made using these data. Without this critical relationship, significant disconnects can occur, resulting in significant planning gaps.

In addition to CEPI and MDE, the Department of Information Technology plays an integral role in the overall management of Michigan educational data. DIT was created in 2002 when individual state agency information technology (IT) Departments were consolidated into one overarching Department. The rationale behind the consolidation was to combine procurement efforts to realize cost savings and to leverage technology across agencies for additional efficiency.

DIT manages all technology support activities for MDE, including:

- procuring all hardware and software;
- maintaining and hosting the MDE Internet presence, including all related Web sites and pages;
- providing help desk services;
- providing field services to maintain and repair technology;
- maintaining MDE telecommunications;
- developing and maintaining the data security infrastructure;
- developing technology applications; and
- maintaining MDE and CEPI databases, collection systems, and verification systems.

At the time of the CCSSO/MGT on-site review, a service agreement between MDE and CEPI was being drafted to provide a detailed comprehensive outline of the role and responsibility of each unit.

Services are already provided based on service-level agreement between MDE and DIT. Currently, DIT also has monthly metrics in place to measure the progress of existing service-level agreements. DIT is in the process of developing (with MDE and CEPI) a data warehouse to serve as the single source of education data in Michigan. DIT staff are currently filling warehouse databases with existing SRSD data and are projecting that the warehouse will be functional before the beginning of the 2004-05 school year. Once activated, the data warehouse will be accessible to all authorized users and will provide standardized data queries for existing data needs as well as the ability to build additional queries.

The CCSSO/MGT review team identified several concerns associated with data management coordination. Major themes include:

- **Coordination of Data Services** – Separating MDE data functions into individual agencies (MDE, CEPI, and DIT) may have created the opportunity to build data management and support capacity in the future, but these actions have also created considerable disconnect in communication and collaboration in the present. The short-term results has been a series of implementation activities that lack focus and interagency buy-in.

- **Data Availability** – Many sources of valuable NCLB data are not available to MDE staff. Some of these data (such as implementation data on public school choice and supplemental educational services) are not being collected. Other data needed by MDE staff cannot be efficiently queried using existing processes. The lack of data has caused substantial frustration among MDE, CEPI, and DIT. However, plans are in progress to substantially improve this situation, including the new comprehensive agreement between MDE and CEPI, and the construction of the new data warehouse by DIT.
- **Compartmentalization** – Some programs within MDE have circumvented the complex process of requesting and receiving additional data by creating individual data “silos”.
- **Data Consistency** – An overarching lack of data consistency exists resulting from the differing data purposes and processes. While there have been improvements in this area, to date, no systemwide project management standards exist to guide data collection and reporting practices across agencies and programs. One result of this situation is that individual programs develop reports using questionable data that have not been subjected to standardized CEPI data standards. Another major by-product are flaws in accountability reporting that have resulted in many appeals. This problem was highlighted recently in the January 30<sup>th</sup> school performance report when one set of accountability report cards was published on the Internet and then had to be retracted due to rounding errors.
- **Business Process** – An overall lack of standardization and communication of programmatic needs, reporting deadlines, data availability, and other related components of data management are apparent. The CCSSO/MGT consultant team found examples of shortfalls among each of the three entities associated with effective educational data management. Considerable ambiguity exists including poorly-defined business rules and the lack of agreement on the scope of services. For example, there is no common mechanism for local school and school district data entry, creating the probability of data collecting and processing problems. Data processes must be refined and enforced to ensure quality in data collection, processing, and reporting.
- **Cross-Training** – Many data collection and reporting responsibilities throughout the state are conducted by individuals, with no other employees knowledgeable of the process. Consequently, when that individual leaves the system, knowledge of the process leaves with them. Currently, Michigan is particularly vulnerable in the reporting of school accountability information due to this situation.

- **Communication** – Perhaps the most important issue created by the separation of data responsibilities is the lack of an integrated communication system among the various stakeholders. This situation is creating considerable frustration among MDE, CEPI, and DIT. All entities are committed to effectively managing their respective responsibilities to improve education in Michigan; however, little quality collaboration exists at this time. Most of the negative issues surrounding data management in Michigan can be related to this overarching problem.

The data management issues detailed above, and others, have created a difficult environment for change within MDE. An overarching lack of coordination among agencies and programs involved in educational data management in Michigan has impeded the effective implementation of NCLB data management requirements to date. Indeed, on the study survey, zero percent of MDE senior staff indicated that the SEA was currently in compliance with NCLB regulations regarding data management (the next lowest percentage was 14 percent regarding NCLB reporting requirements). In addition, data management was consistently cited by senior staff as one of the areas that MDE is least prepared to implement.

These issues notwithstanding, we found substantial efforts on all sides to improve the quality of education data management in Michigan. While there is still a “wait and see” attitude among some MDE staff, most stakeholders recognized that data management concerns are beginning to be addressed.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The Michigan Department of Education is making progress towards an integrated data management system.**
- **In spite of organizational challenges, all entities involved in education data management in Michigan are committed to improving data management processes.**

### **RECOMMENDATIONS**

#### **Recommendation 11-1:**

**Secure a data management contractor to serve as the Project Manager in charge of overseeing data management processes within the State of Michigan. This Project Manager would coordinate the services and activities of MDE, CEPI, and DIT around a set defined set of needs and ensure adequate cooperation and communication among the three groups. Michigan should also develop an implementation strategy that would result in the consolidation of data management functions should centralized project management fail to improve cooperative and coordination among the three responsible entities within in a**

reasonable time line. The effective management of these essential services is critical to ongoing success in data collection and processing for NCLB purposes and must be a priority of the state.

**Recommendation 11-2:**

Define the data management communications process to bring relevant stakeholders to a common understanding of data issues. Senior MDE leadership, along with CEPI and DIT officials and the Data Management Project Manager, should coordinate this process and participation should be mandatory. The current process has resulted in improvements in this areas; however, data management communication remains a significant issue. The Data Management Project Manager position should serve to improve overall communication and collaboration regarding educational data management in Michigan. It is critical for Michigan to create a positive environment for change and to integrate all aspects of NCLB data management.

**Recommendation 11-3:**

Develop a systemwide project management policy regarding data collection, processing, and reporting across all agencies and related programs. Business rules must be refined and set, reporting needs and deadlines must be clearly articulated, and data must be available on enforced schedules. Subsequent to the on-site review, the finalization of an CEPI/MDE memorandum of understanding resulted in agreement that CEPI will manage data collection, processing, and reporting across all agencies and related programs through a common project management approach. This will include requirements for data gathering, project planning and implementation, and regular status updates by CEPI.

**Recommendation 11-4:**

Expand efforts to integrate data “silos.” It is imperative that data from throughout the system be available and integrated to promote ongoing improvement. Michigan legislation recently made CEPI the sole point of education data collection; however, MDE must ensure that all previous silos are dismantled.

**Recommendation 11-5:**

Augment the number of data sources currently available within the Michigan Department of Education to comply with all aspects of NCLB. The comprehensive collection of relevant NCLB data should improve the capacity for effective decision making.

**Recommendation 11-6:**

Create a common template for school district data upload. A single electronic application should be developed to standardize local data upload, even when faced with multiple local student information systems. As this has been a primary concern among all entities responsible for data management, it should be a primary target of process improvement for MDE.

**Recommendation 11-7:**

**Enforce appropriate penalties to districts that submit incomplete, inaccurate, or late data needed to meet NCLB provisions. This additional layer of data accountability is needed to promote accurate data entry and submission from Michigan schools and school districts to the state.**

**Recommendation 11-8:**

**Initiate cross-training of MDE employees in the processing and reporting of NCLB data. The sharing of data management knowledge is critical to the ongoing capacity to effectively meet the requirements of NCLB and maximize the benefits of accountability and school improvement activities.**

**COMPONENT 12: PUBLIC SCHOOL CHOICE**

**Definition:** Students in schools served under Title I that have been identified for improvement for at least two consecutive years must be given the option to transfer to another public school within the school district, including a public charter school, that has not been identified for improvement. Additionally, school districts must provide transportation to the new school consistent with the NCLB requirements. **(Title I, Part A, Section 1116)**

**Rubric Score: 2.5**

**FINDINGS**

The provision for public school choice under NCLB can be a beneficial tool to not only move students out of persistently low-performing schools, but also to motivate low-performing schools to improve or lose needed per-pupil funding. This provision is currently creating difficulties for states and school districts across the country as parents try to place their children in higher-performing schools and school districts are attempting to manage school transfers. The CCSSO/MGT consultant team found, however, that the existing public school choice policy in Michigan has all but made NCLB public school choice requirements a non-issue to date within the state. As a result, Michigan school districts have dealt with very few transfer requests under Title I.

Michigan's state school choice policy allows students to request transfers to any school within the same school district and all contiguous school districts, depending on the school choice policy of the individual Intermediate School District (ISD). Transfers are approved using a lottery system that selects from all transfer applicants meeting the annual July deadline. This policy also provides for the transfer of all per-pupil funds to the new school upon transfer. This creates a competition for students among Michigan schools and acts as an additional motivator for schools to perform well. Michigan also has a strong public charter school program that follows similar student and funding transfer processes.

The MDE has a three-tier process for communicating the requirements of public school choice under NCLB. The state uses the following methods to guide school districts in the provision of public school choice:

- communications from the State Superintendent to school district superintendents and school boards;
- regional workshops to instruct school districts on NCLB issues including public school choice;
- a video conference on NCLB issues, including public school choice requirements; and
- school choice information available on the state Web site.

Although Michigan has a progressive policy on school choice, there is presently no state action plan for implementing public school choice under NCLB/Title I. This is a critical point, as there are aspects of NCLB that may create future issues for the state. As various ISDs have different rules governing school choice, the provision of public school choice under NCLB becomes more difficult. For example, the Michigan school choice policy does not require school districts to provide transportation for student transfers. NCLB requirements, however, mandate school districts to provide transportation up to a certain level. This difference could create challenges to the full implementation of NCLB public school choice in Michigan.

Currently, there is no formal monitoring of school district practices in the area of public school choice. We found the understanding of school choice implementation to be an unofficial barometer developed by anecdotal reports from 19 Field Services Consultants who work with the districts on accountability issues and provide technical assistance. Informal communication between Field Service Consultants and MDE staff comprises the only present school choice data. No official reporting structure exists to provide detailed public school choice data needed to evaluate the compliance of Michigan school districts with the school choice requirements of NCLB. As a result, there is presently no official reporting of school district implementation of public school choice requirements nor monitoring of communication with parents on public school choice options.

Under Title I regulations, Michigan school districts are required to spend 20 percent of Title I allocations for transportation and supplemental educational services, unless a lesser amount is sufficient to meet demand for these services. School districts must spend:

- five percent of the total Title I allocation on transportation for public school choice;
- five percent of the total Title I allocation for supplemental educational services; and
- the remaining 10 percent for transportation, supplemental educational services, or both.

We found that fiscal monitoring in this area is lacking at this point. The MDE does, however, have the Michigan Electronic Grants System (MEGS) that tracks the use of federal grant funds among the districts. The consultant team found that there is a plan in progress to develop a monitoring function in MEGS. This method of tracking public school choice expenditures will allow the MDE to determine if appropriate amounts of Title I funds are used to transport students applying for public school choice under Title I.

Perhaps most importantly, Michigan has not developed a formal action plan to address public school choice under NCLB. Efforts to date were found to lack focused coordination and have been minimal at best. Due to the existing policies on school choice in Michigan, this situation could be expected; however, the requirements of public school choice under NCLB add considerable complexity to the issue. Because there have been few Title I transfer requests, current school choice practices have been sufficient. Increasing knowledge of and demand for NCLB school choice options could, however, reveal shortcomings in state planning.

The existing lack of planning and standardization in the implementation of NCLB public school choice requirements can be especially problematic regarding the larger school districts in Michigan. Large urban school districts typically have the largest concentration of low-performing schools and, thus, the greatest potential for transfer requests under NCLB requirements. As evidence that this could be a significant problem, the lack of effective NCLB school choice planning and public communication in the Detroit City School District recently gained media attention. Although it is important for all school districts to prepare for potential NCLB public school choice transfers, this is critical for larger school districts due to the associated costs of providing for this requirement.

Michigan currently has 120 schools that have failed to meet AYP at least two consecutive years and are subject to school choice transfers under NCLB. Additionally, there are 143 Michigan schools that are in their second year of school improvement and could potentially be subject to school choice consequences next year. An assessment of current school choice transfers under Michigan state law and potential transfers under Title I of NCLB could aid in a comprehensive understanding of the issue.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **Michigan is commended for its progressive approach to public school choice. The existing policies in this area alleviate much of the typical difficulty associated with the transition into compliance with NCLB public school choice requirements.**
- **The plan to monitor school choice expenditures using the Michigan Electronic Grants System (MEGS) is an effective strategy to begin compliance monitoring regarding NCLB school choice regulations.**

## **RECOMMENDATIONS**

### **Recommendation 12-1:**

**Assess the potential relationship between Michigan policies on public school choice and NCLB public school choice. A clear distinction is needed to determine the potential impact related to the full implementation of NCLB requirements.**

### **Recommendation 12-2:**

**Develop a state action plan for addressing public school choice under NCLB. This plan should detail current status and estimated impact of NCLB school choice regulations on transportation, facilities, and personnel as well as strategies for successful implementation. This plan must be linked to the Department's overall strategic plan. All current materials, activities, and resources in this area should be consolidated into this overarching plan. As public knowledge of NCLB school choice opportunities increases, it is likely that Michigan will experience an increase in school choice transfers under Title I. The potential impact of full implementation of school choice requirements demands comprehensive state planning.**

### **Recommendation 12-3:**

**Prioritize Michigan school districts for technical assistance in implementing NCLB public school choice requirements by potential impact. Those school districts showing the greatest potential need should be targeted for additional technical assistance. It is likely that the larger school districts in Michigan will have the greatest need for additional assistance and monitoring by MDE.**

### **Recommendation 12-4:**

**Monitor the use of transportation funds for public school choice to ensure that spending matches need, up to required levels. Legal challenges could result from a situation where school choice transportation resources do not meet need; the state must protect itself from such challenges.**

### **Recommendation 12-5:**

**Collect and consolidate relevant programmatic and student data on public school choice. Currently, little information is available to the MDE to facilitate comprehensive school choice planning. As the Center for Education Performance Information is the mechanism for collecting education data within Michigan, they should assist in developing procedures for implementing this recommendation.**

### **Recommendation 12-6:**

**Increase overall monitoring and evaluation of implementation efforts associated with public school choice to promote successful coordination of services and compliance with federal regulations. This includes the communication of public school choice opportunities to parents and the provision of required services.**

**Legal and academic consequences to non-compliance in school choice are significant and local efforts must be closely scrutinized.**

**COMPONENT 13: PROFESSIONAL DEVELOPMENT**

**Definition:** Under NCLB, school districts must use at least five percent of Title I funds for professional development to help teachers become highly qualified. Additionally, schools identified for improvement must spend at least 10 percent of their Title I Part A funds on professional development for the school's teachers and principal that directly addresses the academic achievement problem that caused the school to be identified. Additionally, states must provide professional development to support other provisions of NCLB. **(Title I, Part A, Section 1111 and 1116; Title I Part A, Subpart 1; Title I Part B, Subparts 1 and 2; and Title II, Part D, Subparts 1 and 2)**

**Rubric Score: 2.5**

**FINDINGS**

Professional development requirements permeate NCLB regulations and federal education programs. Comprehensive professional development promotes effective understanding and implementation of NCLB requirements as well as related state initiatives. Thus, the implementation of effective professional development activities is central to the fulfillment of NCLB requirements in Michigan.

The Michigan Department of Education does not have a formal state professional development plan. As part of Title I requirements the state must ensure that school districts and Title I schools spend at least five percent of their allocation on professional development to help teachers become highly qualified. Additionally, the state must monitor schools identified for improvement to ensure that ten percent of Title I Part A funds are spent on professional development for teachers and principals. Currently, because Michigan is a home rule state, it does not monitor the use of professional development funds by school districts and individual schools. (Note: The state does require five days of professional development for veteran teachers and an additional 15 days for new teachers within their first three years of teaching.)

Even considering this fact, a CCSSO/MGT survey of Michigan Department of Education staff reveals that 70 percent of staff surveyed believe that the SEA is currently complying with NCLB state requirements in the professional development area. This is an indication that most MDE staff are satisfied with the professional development efforts to date.

The Michigan State Board of Education established a task force to address the issue of creating a system to ensure that teachers are highly qualified. The Ensuring Excellent Educators Task Force submitted a report April 11, 2002. Within the report the task force identified five goals. The goals include:

- improve teacher preparation;

- attract and retain high quality teachers;
- reorient teacher professional development;
- focus on the importance of collaborative partnerships; and
- evaluate the profession.

The task force also developed a vision for teacher development efforts, new standards for professional development, renewal requirements, and a focus on professional development tied to scientifically-based practices. The task force activities have provided needed focus to higher education programs, school districts, and the Department of Education in support of developing programs to achieve highly qualified teachers. (Note: The vision came from a rigorous process, and was approved by the State Board of Education in August 2003 with a focus on student achievement, data about student learning, and scientifically-based research.)

LEA grants in Michigan are focused on scientifically-based practices. When applying for grants, school districts must demonstrate how they will be using scientifically-based practices when delivering professional development activities. Detailed information is submitted by the school districts on potential curriculum and practices.

In December 2001, Education YES! was introduced throughout the state. Education YES! is an accreditation system that includes multiple indicators to gauge school quality. Thousands of stakeholders statewide were involved in developing the accreditation system. In March 2002 the State Board of Education approved the Education YES! system. The Education YES! accreditation system has three major areas of focus. The three areas include indicators of:

- engagement;
- instructional quality; and
- learning quality.

The accreditation system in Component Two, Indicators of Instructional Quality, addresses teacher quality and professional development. All schools will receive scores in the teacher quality and professional development areas.

The Michigan State Board of Education also established a task force to address urban, suburban, rural, charter elementary, middle and secondary school principal standards, certification, and professional development issues. The task force submitted the Elevating Educational Leadership Task Force Report on August 8, 2002. The task force developed three recommendations to maximize the effectiveness of the state's school leaders – its principals. The three recommendations include:

- creating a system of administrator endorsement and preparatory program review based on established standards;
- creating an advisory panel to review potential changes to policies and legislation to help redefine the roles and responsibilities of principals; and
- supporting high-quality professional development for administrators.

In January 2004, the State Board of Education approved standards for principal preparation programs, based upon the Interstate School Leaders Licensure Consortium Standards. The standards will be used for higher education preparation programs, and certification. In August 2003, the Superintendent of Public Instruction, directed staff to develop a legislative strategy to establish school principal certification in Michigan law.

In October 2002, the State Board of Education developed a document entitled *Leading Change, A Summary of State Board of Education Task Force Recommendations in Five Areas Vital to the Future of Our Children, Our Schools and Our Community in October 2002*. This document appears to be the beginning of a state strategic plan. Two of the task force groups address teacher and leader quality issues. Within the two areas challenges and action steps have been articulated; however, no delineated outcome measures are identified.

In addition, MDE has partnered with a variety of statewide organizations to assist with the goal of achieving highly qualified educators (paraprofessionals, teachers, and administrators). A Memorandum of Understanding between the MDE and Michigan Virtual University to assist with providing teacher professional development was signed on December 1, 2003. Higher education partners formed a consortium to work on paraprofessional quality. Community colleges are also developing programs designed to increase the competency and capacity of paraprofessional instructional staff.

The MDE also provides additional professional development for teachers under the Reading First Program to school districts throughout the state. Professional development funds are available for all teachers in districts participating in the Reading First Program. The focus of these activities is on the use of scientifically-based reading/literacy strategies.

## **COMMENDATIONS AND RECOMMENDATIONS:**

### **COMMENDATIONS:**

- **The State Board of Education, with support of the Michigan Department of Education, created a task force to address teacher quality and professional development issues. A comprehensive task force report was completed April 11, 2002 providing clear direction in this area.**
- **The State Board of Education, with support of the Michigan Department of Education created a task force to address principal quality and professional development issues. A comprehensive task force report was completed August 8, 2002 providing clear direction in this area.**
- **The Michigan Department of Education has a professional development staff that understands both state and national initiatives focused on professional development. The staff have built national networks to connect with other states regarding professional development issues.**

**RECOMMENDATIONS:**

**Recommendation 13-1:**

Develop a state professional development plan for teachers with state, regional, and district stakeholder involvement. The plan should identify a clear outcome measure that increases the percentage of teachers who annually meet the definition of highly qualified. The professional development plan must be linked to the Department's overall strategic plan. True comprehensive implementation of professional development activities cannot be accomplished without effective consolidated planning in this area.

**Recommendation 13-2:**

Develop a state professional development plan for principals with state, regional and district stakeholder involvement. The plan should identify a clear outcome measure that increases the percentage of principals who annually meet the definition of highly qualified. As the primary source of leadership at the school level, it is critical that Michigan's principals demonstrate needed competencies. The Leading the Future Program, the Bill and Melinda Gates Foundation school leadership development grant being administered by the MVU for the state, provides one level of principal development. Title II funds are also being used for this purpose for targeted schools.

**Recommendation 13-3:**

Monitor the expenditure of Title I professional development funds expended in school districts. Not only are these expenditures a requirement of NCLB implementation, but they are also key indicators of overall effective professional development. As such, it is critical that MDE understands how individual school districts are implementing this important NCLB requirement.

**Recommendation 13-4:**

Continue to be members of the CCSSO National Consortia that focus on teacher and leader quality. This professional relationship with other education systems is an effective method of capacity building and information sharing. States can learn from the experience of others and can decrease errors in implementation while benefiting from successful strategies implemented in other states.

**Recommendation 13-5:**

Assist districts in developing training and professional development plans that meet district and individual school needs. The training and professional development planning must focus on selecting activities that are based on scientifically-based research. Student performance outcomes should drive all professional development planning and professional development training.

**COMPONENT 14: STUDENTS WITH DISABILITIES AND LIMITED ENGLISH PROFICIENT**

**Definition:** NCLB requires the inclusion of students with disabilities and students with limited English proficiency in state accountability measures. States are required to hold students with disabilities and students with limited English proficiency to the same standards and assessments as students in regular education following federal timelines for the implementation of these measures. **(Title I, Part A, Section 1111)**

**Rubric Score:**

**FINDINGS**

The achievement of students with disabilities and limited English proficiency (LEP) under the requirements of NCLB is a national concern. Not only is the success of these students an essential indicator of school district performance, the implementation of NCLB makes it a requirement of Adequate Yearly Progress. Some states across the nation have taken proactive steps to ensure the achievement of students with disabilities and limited English proficiency. In this effort, Michigan holds all public schools and LEAs accountable for the achievement of individual subgroups, including students with disabilities, and students with limited English proficiency.

The Michigan Educational Assessment System (MEAS) has multiple components:

- the Michigan Educational Assessment Program (MEAP);
- MI-Access (alternate assessment for students with disabilities); and
- Additional accommodations for LEP students to enable them to participate in the MEAP were approved by the Merit Award Board in the Department of the Treasury in March 2003.--. This alternate assessment has not been developed and will likely not be. Instead, the Merit Award Board in the Department of Treasury in March 2003 approved additional accommodations for LEP students to enable them to participate in the MEAP assessment.

The policy states, "It shall be the policy of the State Board of Education that each local and intermediate school district and public school academy will ensure the participation of all students in the MEAS." This language serves to ensure that students with disabilities and LEP are assessed on state tests.

Students with disabilities participate in the approved Michigan Educational Assessment System (MEAS) in one of several ways:

- MI-Access, Phase I
- MI-Access, Phase II;
- participation in the MEAP with accommodations; or
- participation in the MEAP without accommodations.

Within MEAS, MI-Access is the state's standardized assessment program designed specifically for students with disabilities whose Individualized Education Program (IEP) Teams have determined that the MEAP is not appropriate for them, even with assessment accommodations. MI-Access has three levels of performance categories: (1) Surpassed the Performance Standard; (2) Attained the Performance Standard; or (3) Emerging Toward the Performance Standard.

MI-Access contracts with the same contractor as MEAP (BETA, Inc.), and the contract currently includes development of the grades 3-8 and 11 MI-Access assessments, starting with Phase 2 MI-Access population (students with, or function as if they have mild cognitive impairment). These assessments will be in place by 2005-06 as required by NCLB.

Relative to assessments for students with disabilities, the Michigan Department of Education uses a variety of means to communicate with the field regarding procedures and interpretation of results to influence instructional practices. The MDE Web site contains materials, resources, frequently asked questions, Web casts of video conference trainings, as well as a running list of strategies used to update district and school-level assessment coordinators. In addition, hard copies of newsletters and handbooks for MI-Access coordinators are distributed, as well as a CD of past and current resources and trainings.

Students with limited English proficiency represent less than four percent of students enrolled in Michigan, and represent 125 languages. An annual English Language Proficiency assessment for LEP students must be administered by each LEA in the five domains of:

- listening;
- speaking;
- reading;
- writing; and
- comprehension.

The Michigan Department of Education has approved six English Language Proficiency tests for selection by the LEAs, and encourages the use of the Woodcock-Munoz Language Survey.

In Winter 2003, the State Board of Education directed the MDE to develop alternate tests for limited English proficient students, in the native language of the students or in simplified English. Since that policy was adopted, several actions have taken place. The Michigan Department of Education, in collaboration with the Office of Educational Assessment in the Department of the Treasury, developed alternate tests in reading and mathematics. The two Departments have also developed proposed accommodations for limited English proficient students taking the regular Michigan Educational Assessment Program tests.

Current procedures in place in Michigan for ELL students are:

- For students who have been in U.S. schools for three years or less, use the English Language Proficiency testing program currently in

place in Michigan to determine whether ELL student should take the regular MEAP tests, with or without accommodations.

- While the alternative Stanford Diagnostic test in reading and math, augmented with regular MEAP tests were previously used, ELL students will not take the regular MEAP tests with accommodations.

In addition, a process was developed and implemented for standard setting and cut-scores on the Stanford Diagnostic Mathematics Test and Stanford Reading Test on June 30, 2003.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- The Michigan Department of Education has outstanding staff who are committed to providing all students with appropriate assessments under the MEAS, assuring results are provided to the field in a timely manner, and meeting federal policies relative to student assessment.
- The Department provides excellent resources and use of varied methods of dissemination and training of local district and school staff on the administration, interpretation and use of assessment results, particularly for students participating in MI-Access. The MI-Access Handbook, and updates for teachers and assessment coordinators, in hard copy and on the Web, is an excellent example of customer service.
- Clear and systematic training and ongoing technical assistance for assessment coordinators are available at the local level, particularly for students with disabilities.

### **RECOMMENDATIONS:**

#### **Recommendation 14-1:**

Continue the excellent communication, training, and ongoing technical assistance to MI-Access Coordinators at the local level, as well as to the overall district MEAP coordinators. The potential impact of students with disabilities and limited English proficiency on AYP is significant. Michigan must use all available methods of providing technical assistance in these areas. If more than one percent of Michigan's students are eligible for an alternative assessment, an exception must be obtained from the Secretary of Education.

**Recommendation 14.2:**

Assure that there is coherence between all programs and staff within MDE with responsibility for assessing students. The Office of Educational Assessment and Accountability should create cross-functional teams within MDE in order to assure MEAS is clearly articulated and inclusive of all assessment components for Michigan's students.

**Recommendation 14-3:**

Strengthen the discussion between ELL program staff, students with disabilities staff, and assessment staff relative to the impact of the assessment program on the instructional programs for these students. Alignment of curriculum, instruction, and assessment are even more critical when considering the educational needs of students with disabilities and limited English proficiency.

**Recommendation 14-4:**

Strengthen the communication between MDE and the field relative to processes and procedures for ELL student assessment decisions, in order to assure that students are not being excluded from the assessment program, and not taking inappropriate assessments. There is potential for misunderstandings at the local level that could jeopardize the effective implementation of state assessments for special needs students. Therefore, Michigan must make every effort to educate district staff on acceptable practices. Recent actions and flexibility by the USDOE relative to assessing ELL students during their first year in school needs to be carefully reviewed and disseminated to LEAs for appropriate implementation to best meet student needs.

**COMPONENT 15: SUPPLEMENTAL EDUCATIONAL SERVICES**

**Definition:** NCLB requires that school districts obtain supplemental educational services for students attending a school not meeting AYP for the third consecutive year. Supplemental educational services can be during non-school hours, from a public- or private-sector provider that has been approved by the state. Additionally, school districts must provide transportation to the service provider. Faith-based organizations are also eligible to apply for state approval. **(Title I, Part A, Section 1116)**

**Rubric Score: 2.5**

**FINDINGS**

The provision of supplemental educational services under the requirements of NCLB is widely regarded as potentially the most powerful aspect of the federal legislation. Although this provision is a component of school consequences that follow the failure to attain adequate yearly progress (AYP), it is also meant to serve as an effective school improvement mechanism. Currently, there are 120 Michigan schools that are required to

provide supplemental educational services to qualified students as well as 143 schools that could potentially be required to provide services next year.

Title I, Part A of NCLB regulations requires all state education agencies to develop a approved list of supplemental educational services providers for use in all school districts that have one or more Title I schools that have not met AYP standards for a third consecutive year. Michigan maintains an Approved Supplemental Services Provider List that is developed using selection criteria that was approved by the Michigan State Board of Education on August 8, 2002. Applications are accepted and reviewed on an ongoing basis and the approved list is updated at least annually. Information submitted by potential providers is scored by an external review committee, using a selection rubric. Applicants must submit information regarding:

- business structure;
- programmatic delivery;
- staffing;
- program effectiveness;
- evaluation and monitoring; and
- pricing.

In addition to the criteria listed above, the state encourages supplemental educational services providers to adhere to the State Board of Education's five strategic initiatives:

- ensuring excellent educators;
- elevating educational leadership;
- embracing the information age;
- ensuring early childhood literacy; and
- integrating communities and schools.

There are presently 44 approved vendors on the state list. Each vendor has met the basic requirements set forth by the Michigan Department of Education. The approved list consists of a mixture of for-profit and non-profit organizations. In addition to school management, tutoring, and curriculum companies, Michigan allows the Intermediate School Districts (ISD) to become service providers. Also, individual school districts in Michigan can provide supplemental educational services as long as they are not currently identified for corrective action under state and federal accountability regulations.

In Michigan, local school districts and public school academies select supplemental educational services providers from the approved state list to make available to the families of students eligible for services. Parents select from this subset of providers and students receive transportation to available services, if necessary. The cost of services and transportation is paid for from school district Title I funds.

At the state level, MDE is required to conduct the following activities in supporting the provision of supplemental educational services:

- maintain an updated list of approved supplemental educational service providers across the state, by school district, from which parents may select;

- promote maximum participation by supplemental educational services providers to ensure that parents have as many choices as possible;
- develop, implement, and publicly report on standards and techniques for monitoring the quality and effectiveness of the services offered by approved supplemental educational services providers;
- withdraw approval from providers that fail, for two consecutive years, to contribute to increasing the academic proficiency of students to whom they provide services; and
- provide annual notice to potential supplemental educational services providers of the opportunity to provide services and to inform potential providers of the eligibility requirements to become an approved provider.

At the local level, qualifying school districts and public school academies (PSA) are required to:

- identify eligible students;
- notify parents annually (in an understandable and uniform format, and, to the extent practicable, in a language the parents can understand) of:
  - the availability of supplemental services
  - the identity of approved providers whose services are within the local school district/PSA or whose services are reasonably available in neighboring local school districts;
- provide parents with a brief description of the services, qualifications, and demonstrated effectiveness of each approved provider;
- assist parents, upon request, in choosing a provider from the list of state-approved providers;
- apply fair and equitable procedures for serving students if the number of spaces at approved providers is not sufficient to serve all students;
- not disclose to the public the identity of any student who is eligible for, or receiving, supplemental educational services without the written permission of the parents of the student;
- enter into an agreement with the supplemental educational service provider, chosen by the parent, that:

- includes all supplemental educational service provider's responsibilities listed above
  - provides for the termination of the agreement if the provider is unable to meet the specific student academic achievement goals and timetables for improving student academic achievement
  - contains provisions with respect to the making of payments to the provider by the local public school district/PSA
  - prohibits the provider from disclosing to the public the identity of any student eligible for, or receiving, supplemental educational services without the written permission of the parents of the student; and
- continue to offer supplemental services until the school(s) in question is no longer identified for school improvement, according to provisions of NCLB.

Currently, there is no formal monitoring of school district practices in the area of supplemental educational services. While state documents identify MDE's responsibility to conduct monitoring and follow-up activities, there is little current evidence that this responsibility is being managed effectively. Similar to public school choice, the current MDE understanding of supplemental educational services implementation is based on unofficial reports from field service consultants working with Michigan school districts. There is presently no official reporting of school district implementation of supplemental educational services and no corresponding documentation of vendor activities or performance.

Under Title I regulations, Michigan school districts are required to spend 20 percent of Title I allocations for transportation and supplemental educational services, unless a lesser amount is sufficient to meet demand for these services. School districts must spend:

- five percent of the total Title I allocation on transportation for public school choice;
- five percent of the total Title I allocation for supplemental educational services; and
- the remaining 10 percent for transportation, supplemental educational services, or both.

The CCSSO/MGT consultant team found that there is little comprehensive monitoring of school districts to ensure that they are meeting these requirements. As detailed in Component 12, MDE does have the Michigan Electronic Grants System (MEGS) that tracks the use of federal grant funds among the districts. As previously mentioned, the consultant team found that there is a plan in progress to develop a monitoring function in

MEGS. This will allow MDE to determine if appropriate amounts of Title I funds are used to support the provision of supplemental educational services under NCLB.

Additionally, Michigan has not developed a formal plan for addressing the requirements of supplemental educational services. While the SEA has limited responsibilities in the implementation of these services, the potential impact of Michigan LEAs not meeting these requirements is significant. We found examples of memoranda and other official communications regarding the requirements of supplemental educational services as well as an effective process for evaluating and selecting vendor applicants. However, once vendors are selected and placed on the approved list, management activities at the state level are, at present, minimum.

Michigan currently has 120 schools that have failed to meet AYP at least two consecutive years and are required to provide supplemental educational services to low-income students under NCLB. Additionally, there are 143 Michigan schools that are in their second year of school improvement and could potentially be subject to school choice consequences next year. This situation calls for strong supplemental services planning and monitoring activities to promote significant student achievement over time.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **Michigan has developed an effective process for evaluating and selecting potential supplemental educational services vendors.**
- **The use of Michigan ISDs and LEAs to provide supplemental educational services is an effective capacity-building model.**
- **The plan to monitor school choice expenditures using MEGS is an effective strategy to begin compliance monitoring regarding NCLB supplemental educational services.**

### **RECOMMENDATIONS**

#### **Recommendation 15-1:**

**Aggressively recruit qualified vendors to supplement the current list of potential providers. Encourage additional ISDs and LEAs to fill existing gaps, especially in remote areas of the state.**

#### **Recommendation 15-2:**

**Develop a state plan for addressing supplemental educational services under NCLB. This plan should detail current status and estimated impact of NCLB school choice regulations on transportation, facilities, and personnel as well as strategies for successful implementation. All current materials, activities, and**

resources in this area should be consolidated into this overarching plan. As public knowledge of NCLB supplemental educational services opportunities increases, it is likely that Michigan will experience an increase in demand for these services.

**Recommendation 15-3:**

Initiate coordinated communications from senior MDE staff to program managers/field consultants, ISD staff, and school district staff. It is critical that a clear line of communications and accountability be developed to address the implementation and monitoring of supplemental educational services.

**Recommendation 15-4:**

Monitor the use of transportation funds for supplemental educational services to ensure that spending matches need, up to required levels. Legal challenges could result from a situation where supplemental educational services resources do not meet need; the state must protect itself from such challenges.

**Recommendation 15-5:**

Collect and consolidate relevant programmatic and student data on supplemental educational services, particularly the impact on student achievement. Little information is currently available to the MDE to facilitate comprehensive planning in this area.

**Recommendation 15-6:**

Increase overall monitoring and evaluation of implementation efforts associated with supplemental educational services to promote successful coordination of services and compliance with federal regulations. Actions include the communication of supplemental educational services opportunities to parents and the provision of required services.

**Recommendation 15-7:**

Increase the role of ISDs in the implementation and monitoring of supplemental educational services. A focused effort to train ISD staff in implementation and monitoring processes is needed. As a result, there should be a consistent flow of valuable implementation information on individual school districts being provided to the Michigan Department of Education.

**COMPONENT 16: EDUCATIONAL TECHNOLOGY**

**Definition:** The Educational Technology State Grants Program awards formula grants to states to support improved student achievement through the use of technology. The program emphasizes high quality professional development; increased access to technology and the Internet; the integration of technology into curricula; and the use of

technology for promoting parental involvement and managing data for informed decision making. **(Title II, Part D, Subparts 1 and 2)**

**Rubric Score: 2.9**

## **FINDINGS**

The effective use of technology in education has become an integral part of educational programs. With this in mind, NCLB contains provisions for the advancement of educational technology use throughout the nation. In alignment with this policy, Michigan, as well as other states across the country, have made technology use a mandated component of state education practice.

The Michigan Department of Education and the State Board of Education first developed Michigan's State Technology Plan in 1992 to support the role that technology can play in furthering the educational mission and contributing to student achievement. The Michigan's State Technology Plan includes 21 recommendations. One fundamental recommendation is the creation of statewide policies that address equity of access to technology – delivered learning resources for all students regardless of their economic status, place of residence, age, disability, and other factors. An additional recommendation calls on MDE and other educational interests to intensify their advocacy of technology in the learning environment.

The most recent update of the Michigan's State Technology Plan was completed in 2000; a new technology plan update will be completed in 2004. Michigan's plan was updated with the assistance of the State Superintendent's Education Technology Advisory Group (ETAG). This group includes citizen input to plan for technology implementation. The plan includes identified challenges, rationale and implementation, and an update. No outcome measures were included as part of the plan. Approximately 70 percent of all Michigan classrooms have Internet access. Currently, some small schools in Michigan do not have access to the Internet.

The 2000 Michigan's State Technology Plan contains 21 recommendations to accomplish. The State Board adopted the recommendations with the understanding that they are essential and significant steps necessary to advance the application of technology in the learning environment and provide substantial benefit to students throughout Michigan. The following recommendation items are included in the state plan:

1. Equity
2. Technology Integration
3. Competency Expectations of K-12 Graduates
4. Training (Ongoing training)
5. Technology Budgets and Training
6. Teacher Competencies
7. Information Clearinghouse
8. Technology Staffing Levels
9. Supplementary Technical Support
10. Infrastructure Support
11. Technical Standards
12. Model Technology Plan

13. Technology Appropriation
14. Funding Flexibility
15. Collaboration
16. Statewide Purchasing and Licensing
17. Advocacy
18. Public Awareness
19. Administrative Communications
20. Electronic Learning Community.
21. State Technology Plan

The state plan includes five percent of Educational Technology State Grants Program funds for state-level technology activities. The consolidated plan also includes provisions to distribute 50 percent of the remaining funds to LEAs based on their share of Title I Part A funds and 50 percent of any remaining funds is provided to school districts. This is done as part of the state plan.

In support of the state technology plan, computer technology was targeted to individual students. In collaboration with the State Legislature and the MDE, laptops were provided to some of Michigan's students. Professional development activities for staff is also included in the plan. A special focus of these activities is directed to teacher use of technology in the classroom. The Department has also provided additional technology assistance to high poverty districts throughout the state. A program evaluation for technology implementation is being conducted.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **A state technology plan has been in place since 1992 and was most recently updated in 2002.**
- **The Michigan Department of Education is commended for its involvement of citizens as members of the State Superintendent's Educational Technology Advisory Group (ETAG) to assist with the updates to the technology plan.**

### **RECOMMENDATIONS**

#### **Recommendation 16-1:**

**Continue to update the state technology plan over time. Clear outcome measures should be developed to guide all work. All activities and resources should be aligned to implementing the state technology plan goals.**

#### **Recommendation 16-2:**

**Develop an Internal Technology Plan with short- and long-term goals to support the Departments work and NCLB requirements in collaboration with The**

Department of Information Technology (DIT), CEPI, and other state partners. The Department of Education should make the Internal Technology Plan available to all state partners. The MDE should consider joining the CCSSO Decision Support System Architecture Consortium. Membership in the consortium would allow MDE to participate in the Phase One component of the project. Phase One includes the development of an SEA Internal Technology Blueprint, consortium meetings, and the development of a national Request for Proposal (RFP).

**Recommendation 16-3:**

Integrate the technology plan as part of the Department's single strategic plan. Technology should be embedded throughout the Department's strategic plan. In addition, regular updates about implementation activities should be planned by the Department's senior leadership team.

**COMPONENT 17: STUDENT SAFETY AND HEALTH**

**Definition:** NCLB contains provisions designed to promote student health and safety. The Safe and Drug-Free Schools and Communities Act supports programs to prevent violence in and around schools; prevent the illegal use of drugs, alcohol, and tobacco by young people; and foster a safe and drug-free learning environment. The Gun-Free Schools Act places requirements on all states receiving NCLB funds regarding guns on school campuses. The Unsafe School Choice Option requires each state receiving funds under NCLB to implement policy requiring that students who attend persistently dangerous schools or become victims of violent crimes on their school grounds be allowed to attend a safe school within the same school district. The Pro-Children Act of 2001 prohibits smoking in buildings used to provide children under the age of 18 with regular or routine health care, day care, education, or library services. **(Title IV, Part A; Part A, Subpart 3, and Part C; and Title IX, Part E)**

**Rubric Score: 2.8**

**FINDINGS**

In the wake of tragic circumstances that have plagued some schools in recent years, there has been a national focus on providing safer schools that promote overall student health. In this effort, state departments of education, including the MDE, have taken steps to implement national programs designed to provide improved educational environmental for students.

The Michigan Department of Education serves as the flow-through agency for Title IV funds to the Office of Drug Control Policy to fully administer the Safe and Drug Free Schools and Communities program. The consultant team found that all procedures and guidelines as set forth in Title IV are followed by the Office of Drug Control Policy for administration of this program. A small amount of personnel and operating funds are maintained in the MDE for one full-time consultant who works with districts and schools relative to the State Board of Education's Safe School Choice Policy.

Adopted in April, 2003, the policy requires the collection of school district and building-level expulsion and crime incident data, which are collected through CEPI, along with the Single Record Student Database (SRSD) and School Infrastructure Database. Further, the policy defines “Persistently Dangerous School” as one which, “..for each school year, for three consecutive years, more than 2.5 percent of pupils, or five pupils enrolled in the school, whichever is greater, have been expelled by the school board or its designee, as described in the MCL 1311 (1) of the Revised School Code, for more than ten consecutive days, for committing at school any of the following offenses, as defined by the Revised School Code:

- arson
- physical assault
- bomb threat, or similar threat
- criminal sexual conduct
- possession of a dangerous weapon, or
- if, for each school year, for three consecutive years, more than 2.5 percent of pupils or five pupils enrolled in the school (whichever is greater) have been victims of a violent criminal offense.”

Alternative education programs and strict discipline academies that are appropriate for expelled individuals are exempt from this policy, as are juvenile detention facilities.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The MDE Office of School Support Services, School Health Unit, have competent staff who work with the field to assure that the total needs of children and youth are considered across the various programs for which they have responsibility, including the issue of school climate and culture as part of the totality of school safety.**
- **The State Board of Education has a clear policy on persistently dangerous schools.**

### **RECOMMENDATION**

#### **Recommendation 17-1:**

**Develop a formal memorandum of understanding between MDE staff and the Office of Drug Control Policy (ODCP) to assure that technical assistance needs of districts and schools are appropriately being met, particularly related to the**

implementation of the Board's policy direction. Communication and training are needed to ensure that Michigan meets all requirements in this area.

**COMPONENT 18: OVERALL ORGANIZATION OF THE STATE EDUCATION AGENCY**

**Definition:** In several sections of NCLB, reference is made to the need for greater collaboration and communication at the state level and among the state, local and national levels. The statements in this section address the state's readiness to fully implement NCLB. This component is designed to evaluate the organization's operational capacity to successfully implement state and national laws. All provisions of NCLB are supported by effective organizational management.

**Rubric Score: 2.6**

**FINDINGS**

The Governor, State Board of Education and State Superintendent have worked in partnership to improve Michigan's public schools. Under the leadership of State Superintendent of Public Instruction, Tom Watkins, the State Board of Education has moved to clarify the state's focus and plan to improve Michigan schools. Several initiatives support the work of the Governor, State Superintendent, and State Board of Education in clarifying the mission and goals for all public schools. The initiatives include:

- convening public forums;
- creating State Board of Education Task Forces;
- developing a draft strategic plan to support the Board's goal;
- creating a new school improvement system;
- reorganizing the Michigan Department of Education to include statewide assessment and accountability;
- focusing on improving student data tracking; and
- participating in the Governor's Organizational Core Values training.

Article VIII, Section 3, of the 1963 Michigan Constitution provides that:

*Leadership and general supervision over all public education, including adult education and instructional programs in state institutions, except as to institutions of higher education granting baccalaureate degrees, is vested in a state board of education. It shall serve as the general planning and coordinating body of all public education, including higher*

*education, and shall advise the legislature as to the financial requirements in connection therewith.*

The State Board of Education consists of eight members elected to eight-year terms. The Board appoints the State Superintendent of Public Instruction to be responsible for execution of Board policies and to be the principal executive officer of the State Department of Education which has powers and duties provided by law.

The MGT/CCSSO consultant team found that the Michigan Department of Education has worked hard to improve its capacity to serve public schools and implement state and federal reform legislation. The Department is transitioning to a new organizational division structure. The staff is experienced and understands the priorities of state and federal legislation. In a CCSSO/MGT survey, 62 percent of staff stated that they believe that implementation of NCLB will benefit students in Michigan. Currently, there are 328 full-time employees in the Michigan Department of Education.

The state has completed a reorganization based on public and Department self-evaluation information. The public organization, Citizens Research Council of Michigan (CRCM) was requested by State Superintendent of Public Instruction to assess the way in which the State of Michigan is organized to execute its educational duties. CRCM worked with legislators, educators, citizens, and MDE staff to evaluate the current organizational structure of the Department. A report was completed January 2003 (Report #335). The Department and State Board have worked cooperatively to implement a plan to improve district, school, and student performance.

The Department of Education has reorganized around six functional divisions. The reorganized divisions are:

- Office of the Superintendent
- Educational Assessment and Accountability
- Office of School Improvement
- Office of Special Education and Early Intervention Services
- Office of Early Childhood Education & Family Services
- Office of Financial Management
- Office of Grants Coordination and School Support
- Office of Human Resources
- Michigan Schools for the Deaf and Blind
- Office of Professional Preparation
- Office of School Finance & School Law
- State Board of Education Office

The State Board, State Superintendent, and the Leadership Council of the Department have worked to clarify the vision, mission, core values, and goals for the Department and Michigan schools. With the Governor's assistance and guidance, core values were reexamined in all departments in state government. The MDE is currently clarifying the core values that will drive the work of state staff.

The Department has also assigned officers to assist with customer complaints. The state ombudsman program works with citizens to address citizen concerns about public education.

The Department and State Board have crafted a draft strategic plan to achieve the goals outlined by policy makers, parents, community members, and educators. The Board developed five task force work groups to move its single statewide goal forward. The strategic plan, by legislative mandate, is submitted to the Governor's office annually.

Under the Governor's direction and leadership, all agencies within state government will be assigning an Organizational Development Officer (ODO). This person will be a liaison to other state agencies and will have the primary responsibility of working to change the culture to align with the four values and facilitating strategic planning activities within the agency. The ODO will work closely with the Department's senior leadership group in the coordination and implementation of strategic planning activities.

Based on results from the CCSSO/MGT survey, 43 percent of MDE staff believe the implementation of NCLB requirements is being effectively coordinated across areas of responsibility.

## **COMMENDATIONS AND RECOMMENDATIONS**

### **COMMENDATIONS**

- **The Michigan Department of Education conducted an organizational study to determine the best way to reorganize to better serve local education associations. The Citizens Research Council of Michigan completed the reorganization report at the request of the State Superintendent.**
- **The Michigan Department of Education conducted a NCLB readiness study funded by business partners.**
- **The Michigan Department of Education has taken steps to better identify external and internal state partners. The Memorandum of Understanding with the Center for Educational Performance and Information (CEPI), within the Office of the State Budget, is an example of both state partners formalizing a written cooperative agreement.**

### **RECOMMENDATIONS**

#### **Recommendation 18-1:**

**Develop one strategic planning document that guides and lists action steps to move State Board and Department initiatives to full implementation. The creation and updating of the plan must include other state agencies, and regional and district stakeholders. These stakeholders should include other agencies that have responsibility for state and NCLB data collection, implementation, and internal technology issues. The strategic plan should be submitted to the Governor annually as required by legislative mandate.**

**Recommendation 18-2:**

Promote the implementation of a structure for ensuring that the technical and the business side of data collection and reporting are coordinated and well managed (also see Component 11). The Michigan Department of Education should consider hiring a project manager/consultant to facilitate the implementation of the internal technology plan that addresses hardware, software, network, data collection, management, and reporting issues. This project manager/consultant should assist the senior leadership team with the implementation of the MDE Internal Technology Plan and bring all agencies and partners together to insure the success of the plan. There is a need for the Department to coordinate with the Office of Finance and Administration (CEPI) and the Department of Information Technology (DIT). Formal Memoranda of Agreements must be developed and annually updated with all external agencies that have responsibilities for the implementation of elements of the system. The MDE must be able to forecast its technological challenges and needs in order to better work with the Department of Information Technology. This planning should be included as part of the Internal Technology Plan. A team has been named to meet monthly to address these issues, and we do have a formal agreement with CEPI and DIT.

**Recommendation 18-3:**

Using the National Baldrige Award materials, coordinate the completion of a diagnostic assessment by the senior leadership team using the Baldrige survey instruments. Improvement items should be selected for implementation. Additionally, a Department organizational profile should be completed as part of the strategic plan. All materials can be found on the National Baldrige Quality Award Web site.

**SECTION 4 – SUMMARY AND  
CONCLUSIONS**

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## **SECTION 4 – SUMMARY AND CONCLUSIONS**

Organizational practices impact the success of educational policy implementation. Perhaps never in the history of the federal role in public education has there been a better example of this than the *No Child Left Behind Act* (NCLB). This legislation affects virtually every aspect of state and local educational systems, and the organizational practices of SEAs across the nation will dictate success or failure in its implementation. The rewards for successful implementation may be high for NCLB, but the consequences for failure are significant.

The requirements of NCLB are presently challenging state education systems to perform at levels beyond what was previously considered sufficient. Now, it is not enough to display overall student achievement at the school, school district, and state levels. Educational agencies are now responsible for the achievement of students in all subgroups. The result is a new focus on meeting the needs of every student, not only in theory, but in practice. The results of these efforts must now be publicly reported and educational agencies face sanctions for failure.

In response to these challenges, Michigan has undertaken many activities to promote the successful implementation of NCLB requirements. Subsequently, many instances of effective NCLB implementation are apparent throughout the Michigan Department of Education. In this early phase of NCLB implementation, it is appropriate that opportunities for improvement exists. Hence, there are also areas of NCLB implementation that could be improved to maximize the benefits to the state of Michigan.

The CCSSO/MGT team identified practices in the overall implementation process that displayed varying levels of implementation and quality. From our findings on organizational structure, process and practice, we compiled commendations and recommendations that are designed to identify successful implementation strategies as well as to improve on areas of concern. Generally, these commendations and recommendations illustrate current status and potential development in Michigan's implementation of NCLB requirements.

From the over 88 diverse recommendations developed from the review findings, several general themes can be constructed. The following themes are not presented in order of priority.

- Data management operations within the Department of Education should be refined systemwide. The importance of data quality cannot be overstated and circumstances resulting from flawed data management practices have caused significant problems within the Department of Education. MDE and other related agencies have taken steps to improve the overall quality of data management; however, there is much to be done to implement an adequate data management structure. A coordinated effort is needed to improve:
  - data needs assessment;
  - interdepartmental and interagency communication on data issues;

- the quality of data coming from the schools, school districts, and Intermediate School Districts;
- the availability of needed data; and
- the capacity to process and disseminate data efficiently and effectively.

The MDE has had too many offices/functions involved in data management moved to other agencies (CEPI, DIT, MEAP). However, at the time of the draft report, Memorandums of Understanding (MOUs) had been developed and extensive work had begun on collaborate planning to improve the efficiency and effectiveness of data management.

- Many of the same concerns with data management complicate and inhibit MDE's ability to report performance data efficiently and accurately. As effective data reporting is the primary form of communication with public stakeholders, the Department of Education should consider this area of NCLB implementation as among the most critical for improvement. Public mistakes in educational data reporting can quickly erode public confidence in Michigan's accountability efforts and overall system performance.
- Michigan should increase the centralized monitoring of NCLB implementation activities at the state and district levels. Michigan has been proactive in many areas of NCLB implementation, resulting in various activities taking place simultaneously. To date, the monitoring of these activities has been inconsistent across the Department of Education. MDE can better promote comprehensive and effective implementation of NCLB requirements by coordinating and intensifying monitoring activities.
- A more comprehensive evaluation process is needed to ensure the quality of implementation practices in Michigan. Implementing the components of NCLB requires complex strategies and practices. The long-range realities associated with NCLB policy implementation call for a thorough evaluation process to identify systemic strengths and weaknesses. Michigan has much to gain from the effective implementation of NCLB requirements. Only through a centralized process of cyclical planning, monitoring, and evaluation can Michigan realize the full potential of NCLB implementation success.
- Comprehensive professional development is needed to support many areas of NCLB implementation on Michigan. The complex nature of NCLB implementation responsibilities at the state and local levels necessitates that a great deal of information be transferred to appropriate staff. Situations exist in Michigan where SEA and LEA staff lack training in critical areas of NCLB implementation. While professional development activities are time consuming and are difficult to coordinate and fund, the impact of

focused, quality training in NCLB implementation could substantially increase success in some areas.

- In light of the reduced resources that MDE is currently operating with, the agency should promote every opportunity to build capacity by cross training staff within and among programs and divisions. Presently, circumstances exist where critical knowledge of NCLB implementation practice is held by a single individual. In other instances, NCLB implementation could be more effective if staff from differing agencies and programs understood the overall process and not just one compartmentalized task.

Cross training activities could greatly enhance the Department's capacity in implementing the requirements of NCLB. Cross training staff in critical areas would also reduce MDE's vulnerability if a key employee is unable to perform implementation duties.

- Michigan should increase the involvement of the Intermediate School Districts in implementing the requirements of NCLB. The ISDs have the potential to assist the Department of Education in many NCLB implementation activities. Currently, the role that ISDs serve in NCLB implementation varies regarding activity and the individual ISD. MDE should attempt to refine the present responsibilities of the ISDs and examine the potential to increase ISD responsibilities.
- The MDE should develop one strategic plan and include employee and stakeholder involvement. The strategic plan should focus on clear outcome measures. All major department activities should be included in the action plans for implementation. The development of a strategic plan will be a powerful tool to get all employees and partners focused on the strategic future of Michigan's public schools.

Overall, the Michigan Department of Education has effectively addressed the initial phase of NCLB implementation. The proactive implementation of federal requirements under the *Improving America's Schools Act* placed Michigan ahead of many states in the ability to transition into compliance with NCLB. The proactive implementation of IASA has been both a positive aspect of NCLB implementation—much of the state accountability and assessment structures were in place before required NCLB timelines, and a negative aspect of implementation—many of Michigan's schools are already identified for various levels of NCLB sanctions. In support of the positive aspects of NCLB implementation for Michigan—and despite the negative consequences of early implementation—MDE has moved forward in responding to its responsibilities under the federal legislation. Indeed, most of the 18 identified components of NCLB implementation are currently being addressed by Michigan.

Other factors such as Michigan's public school choice policy have also facilitated easier transition into meeting the requirements of NCLB. Significant challenges to successful implementation do exist, but the MDE is attempting to identify those challenges and successfully overcome them, as evidenced by the commission of this review. Above all,

MDE staff display a commitment to educating Michigan students, and remain resolute in the successful implementation of NCLB requirements.

Because the state of Michigan is ahead of many states in the implementation of NCLB requirements, it has many individual programs and initiatives that are in various stages of implementation. As some components of NCLB implementation are more important than others in the short term, Michigan should focus on the major priority challenges presented by NCLB and allow less critical areas of implementation to wait. The Department of Education should identify recommendations within this report that will have the greatest impact on systemic success. The key to Michigan's sustained success in this area is in tailoring implementation efforts to suit the specific and unique needs of the state education system.

Within this document, we have highlighted some commendable practices as well as recommended many strategies to assist Michigan in addressing the requirements of NCLB. These suggested strategies are designed to refine the present implementation process in Michigan as well as to identify improvement opportunities in the execution of NCLB responsibilities. It is our hope that these recommendations will be used to the benefit of the state education agency and the students of Michigan.

***APPENDIX:***  
***SURVEY RESULTS***

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**APPENDIX  
STATE EDUCATION AGENCY (SEA)  
SELF-ASSESSMENT ON IMPLEMENTING THE  
NO CHILD LEFT BEHIND ACT**

**TOTAL NUMBER OF RESPONSES = 17 out of 26**

**PART A: OVERALL PERCEPTIONS OF NCLB REQUIREMENTS**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
1. The requirements of NCLB are well designed.	0	6	19	56	19	0
2. The USDOE provided for sufficient State Education Agency input in the development of NCLB requirements.	0	0	13	31	50	6
3. The requirements of NCLB are appropriate for the current educational environment in the United States.	0	18	6	59	18	0
4. The requirements of NCLB are appropriate for the current educational environment in our state.	0	18	0	59	24	0
5. All requirements of NCLB can be successfully implemented in the United States.	0	0	12	41	47	0
6. All requirements of NCLB can be successfully implemented in our state.	0	6	12	47	35	0
7. Implementation of the requirements of NCLB will benefit students in the United States.	0	35	29	35	0	0
8. Implementation of the requirements of NCLB will benefit students in our state.	0	35	29	35	0	0
9. Implementation of the requirements of NCLB will increase student achievement in the United States.	0	41	29	24	6	0
10. Implementation of the requirements of NCLB will increase student achievement in our state.	0	41	29	24	6	0
11. Implementation of the requirements of NCLB will close gaps in student achievement in the United States.	0	24	41	29	6	0
12. Implementation of the requirements of NCLB will close gaps in student achievement in our state.	0	24	35	29	12	0
13. Implementation of the requirements of NCLB will improve the effectiveness of State Education Agencies in the United States.	0	24	18	35	18	6
14. Implementation of the requirements of NCLB will improve the effectiveness of our SEA.	0	29	24	29	18	0
15. Implementation of the requirements of NCLB will improve the effectiveness of my division(s)/department(s).	0	29	24	35	12	0
16. Implementation of the requirements of NCLB will improve the effectiveness of schools in the United States.	0	29	29	29	12	0
17. Implementation of the requirements of NCLB will improve the effectiveness of schools in our state.	0	29	29	29	12	0

Legend:

\*SA = Strongly Agree, A = Agree, N = Neither Agree/Disagree, D = Disagree, SD = Strongly Disagree, DK/NA = Don't Know/Not Applicable

**18. DESCRIBE THE MOST SIGNIFICANT BENEFITS TO THE IMPLEMENTATION OF NCLB REQUIREMENTS IN OUR STATE (IF ANY).**

- It may help some students, but not all.
- Clear targets (performance goals). Accountability for improvement in student achievement.
- There will be more consistency of requirements across the state.
- This Act has brought us to the forefront of teachers' and administrators' consciousness the need to implement a rigorous standards-base curriculum and that the bottom line is student achievement. In addition, this Act has helped to establish the reality of accountability as an integral component of a quality organization.
- Student accountability. School-system accountability.
- The singular focus on measured student achievement via statewide tests, required by NCLB, has made statewide test scores the priority outcome measures. Such focus was previously lacking.
- Focus on accountability.
- The "ideas" but not the implementation process and timeline.
- Greater focus on the need to improve student achievement.
- Setting of standards. States will do this or that to reach student achievement goals. The focus on student achievement is of great benefit.
- Focus on accountability for student outcomes.
- Focus on standards and high expectations of all students/teachers.

**19. DESCRIBE THE MOST SIGNIFICANT CONSEQUENCES TO THE IMPLEMENTATION OF NCLB REQUIREMENTS IN OUR STATE (IF ANY).**

- Inappropriate and unnecessary labeling of schools as failing due to impossible requirements (e.g. disaggregation of data). Lack of funding sufficient to implement all requirements, particularly to Non-Title I schools/students.
- The unintended labeling of schools as "failing". The inability of our state to fully implement the requirements of NCLB, due in large part, to insufficient capacity and resources.
- Difficult to implement requirements for the diverse groups - so many schools. May fall into needs improvement or corrective action even if they show gains in the general population.
- The tremendous workload increase for staff -- especially since many positions could not be filled due to the hiring freeze.
- Sanctions for schools in at-risk communities.

- NCLB requires a business-like, "by the numbers", approach to planning, implementation, evaluation, and decision-making activities. Educators at all levels-SEA, complex areas, schools-generally lacks training and experience working that way.
- Impact on schools with status.
- The sanctions penalize the lower socio-geographic (remote)-economic areas.
- More negative labeling of schools and public education bashing.
- Some of the requirements are simply not achievable given the time constraints. We need more time/more resources.
- Schools will see themselves as failures including the school communities if they do not attain AYP.
- Impossible to achieve NCLB requirements resulting in low morale, exodus of teachers/administrators from education, students feeling demoralized and giving up; huge burden placed on schools.
- Expectation of ESL students entering the USA to meet the criteria of NCLB. Also, for all special education students to meet NCLB requirements, if parents choose to not have students take tests, they are still counted.
- Still no parent accountability, teacher shortages and administrative shortages may compound punitive aspects of NCLB; despite touting of scientific methods for ensuring reading success-where are they? And no money from feds to fund and no public school left standing and mass retirements.

**20. WHAT ARE OUR SEA'S GREATEST STRENGTHS WITH REGARD TO THE IMPLEMENTATION OF NCLB (IF ANY)?**

- One centralized school district.
- A single SEA/LEA can communicate a coherent systematic approach to implementing NCLB.
- Since we are one system (district) it is easier to develop one plan for the state. We do not need to deal with multiple districts who may disagree.
- A single state system that enables the consistent and coherent implementation of the law. Dedicated, student-focused DOE personnel who give 200% effort to meet the unrealistic timeline expectations of this Act -- and in spite of the inadequate staffing!
- Attitude of leadership to meet requirements.
- As a single, unified SEA/LEA, the Hawaii public school system comprises one jurisdiction. As such, authority disputes are relatively rare. Time and energy can be focused on getting the job done well.
- Comprehensive and focus support to the schools.
- Sec. 1118 to increase parent/community involvement.
- Unified system; able to implement evenly throughout the state.

- We are one unified system. Funding/resources are equitable however limited.
- Single statewide school system--easier to implement statewide.
- Consistent, statewide educational system.
- We are a statewide system (one school district) so every school is on the same page.
- We are organized and now using data to drive improvement, assess progress.

**21. WHAT ARE OUR SEA'S GREATEST WEAKNESSES IN REGARDS TO THE IMPLEMENTATION OF NCLB (IF ANY)?**

- Lack of sufficient funding. Uncertain economic conditions.
- Lack of sufficient capacity and resources to implement high quality services. "Change is difficult".
- Training capacity to meet requirements.
- The lack of comprehensive data collection and management system to enable real time reporting on personnel, student achievement, budget, school data, etc.
- Geography. Teacher/Administrator shortages. Funding for schools. Poor economy of state; political climate of desiring change.
- 1. Lack of sufficient capacity to support, "turn around", under-performing schools. 2. Lack of sufficient capacity in the area of assessment, analysis, and accountability (including data management). 3. The administrative/operational aspects of "district" (LEA) support services are enmeshed in the too complex politics related to our SEA/LEA structure.
- No consideration has been made for unique circumstances such as the high poverty level or rural areas where it is difficult to get people with college degrees. No consideration was given to our "makun" or "kupnna" who impact cultural knowledge to our students.
- Communication.
- Teacher and Educational Assistant degrees. This has a sweeping effect on hard to fill areas.
- Insufficient funding; staffing shortages.
- Lack of resources. Movement of a large system can sometimes be slow.
- Some teacher qualification/certification and most paraprofessional qualification.
- Very, very difficult to implement NCLB requirements and still meet the needs of all students.
- None, if there are any it would be providing time for everyone to do what needs to be done well with consideration of facets of schooling other than NCLB.

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**PART B: UNDERSTANDING AND COMMUNICATION**


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STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
1. I have a good understanding of the requirements of NCLB as they relate to my job.	18	77	6	0	0	0
2. I have a good understanding of the statewide requirements of NCLB.	18	77	6	0	0	0
3. The USDOE has effectively communicated the requirements of NCLB to our SEA.	0	25	44	31	0	0
4. Our SEA has effectively communicated the requirements of NCLB to its individual divisions/departments.	6	71	18	0	6	0
5. Our SEA has effectively communicated the requirements of NCLB to its individual school districts and schools.	6	71	24	0	0	0
6. Employees of our SEA have been made aware of their responsibilities in implementing to NCLB.	6	82	12	0	0	0

Legend:

\*SA = Strongly Agree, A = Agree, N = Neither Agree/Disagree, D = Disagree, SD = Strongly Disagree, DK/NA = Don't Know/Not Applicable

**7. WHAT COULD OUR SEA DO TO IMPROVE THE SYSTEMWIDE UNDERSTANDING OF NCLB REQUIREMENTS AND EMPLOYEE RESPONSIBILITIES?**

- Ensure that the parents and communities are given an opportunity to understand NCLB.
- Continue to provide seminars to improve understanding.
- Provide smaller work communication units. Low monitoring-tracking system. Feed back and follow-up poor.
- Not sure. In context, NCLB is just on of the many important things that needs attention.
- Continue with the communication efforts.
- Reduce "clutter" of other initiatives. Focus on NCLB.
- Additional inservice.
- Create Web site for FAQ for anyone in state to access.
- Continue with timely, accurate communication.
- Give schools, teachers, and administrators TIME to plan effective lessons; provide adequate resources; decrease paperwork; continue to provide effective systemwide staff development.

**PART C: REQUIREMENTS OF THE NO CHILD LEFT BEHIND ACT**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
1. Our SEA is currently in compliance with NCLB state requirements in the following areas:						
a. Academic Standards	18	82	0	0	0	0
b. Accountability/Adequate Yearly Progress (AYP)	6	82	12	0	0	0
c. Reporting	6	82	12	0	0	0
d. Low-Performing Schools	0	59	18	12	6	6
e. School Support and Recognition	0	35	41	24	0	0
f. Student Assessment	12	77	6	0	0	6
g. Teacher Qualifications	0	38	25	38	0	0
h. Paraprofessional Qualifications	0	31	25	38	6	0
i. Reading First/Early Reading First Programs	0	88	0	6	0	6
j. Transferability	0	56	31	6	0	6
k. Data Management	0	29	29	35	0	6
l. Public School Choice	6	88	6	0	0	0
m. Professional Development	0	59	29	6	0	6
n. Students With Disabilities and Limited English Proficiency (LEP)	0	47	29	24	0	0
o. Supplemental Educational Services	0	71	18	12	0	0
p. Educational Technology	0	38	50	13	0	0
q. Student Safety & Health	6	71	18	6	0	0
r. Overall Organization of the SEA	6	71	24	0	0	0
2. Our SEA will have difficulty complying with NCLB state requirements in the following areas:						
a. Academic Standards	0	38	13	38	6	6
b. Accountability/Adequate Yearly Progress (AYP)	6	56	0	25	6	6
c. Reporting	6	19	19	44	6	6
d. Low-Performing Schools	19	44	6	25	0	6

Legend:

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**PART C (Continued):**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
e. School Support and Recognition	6	35	18	35	0	6
f. Student Assessment	6	13	25	38	13	6
g. Teacher Qualifications	12	59	0	18	0	12
h. Paraprofessional Qualifications	12	65	6	12	0	6
i. Reading First/Early Reading First Programs	6	12	12	53	6	12
j. Transferability	0	25	19	44	0	13
k. Data Management	18	29	29	18	0	6
l. Public School Choice	6	18	12	59	0	6
m. Professional Development	6	18	35	29	0	12
n. Students With Disabilities and Limited English Proficiency (LEP)	6	29	29	24	0	12
o. Supplemental Educational Services	6	24	6	53	0	12
p. Educational Technology	0	19	38	25	0	19
q. Student Safety & Health	6	12	24	53	0	6
r. Overall Organization of the SEA	0	18	24	47	6	6
<b>3. The implementation of the following components of NCLB will benefit students.</b>						
a. Academic Standards	29	65	6	0	0	0
b. Accountability/Adequate Yearly Progress (AYP)	0	65	12	18	6	0
c. Reporting	0	71	24	6	0	0
d. Low-Performing Schools	0	47	29	18	6	0
e. School Support and Recognition	24	59	18	0	0	0
f. Student Assessment	18	71	6	6	0	0
g. Teacher Qualifications	18	59	12	6	6	0
h. Paraprofessional Qualifications	6	65	18	6	6	0
i. Reading First/Early Reading First Programs	12	82	0	0	0	6
j. Transferability	0	6	69	13	6	6
k. Data Management	6	59	35	0	0	0
l. Public School Choice	0	12	65	6	18	0

Legend:  
 \*SA = Strongly Agree, A = Agree, N = Neither Agree/Disagree, D = Disagree, SD = Strongly Disagree, DK/NA = Don't Know/Not Applicable

**PART C (Continued):**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
m. Professional Development	24	65	12	0	0	0
n. Students With Disabilities and Limited English Proficiency (LEP)	6	59	12	12	6	6
o. Supplemental Educational Services	6	59	18	6	6	6
p. Educational Technology	6	71	18	0	0	6
q. Student Safety & Health	12	77	12	0	0	0
r. Overall Organization of the SEA	6	47	35	6	0	6

Legend:

\*SA = Strongly Agree, A = Agree, N = Neither Agree/Disagree, D = Disagree, SD = Strongly Disagree, DK/NA = Don't Know/Not Applicable

For items 4 through 7, please refer to the 18 areas of NCLB contained in previous table.

**4. LIST THE THREE AREAS OF NCLB THAT OUR SEA IS MOST PREPARED TO CURRENTLY COMPLY WITH.**

- Academic Standards, Student Safety & Health, Reading First
- Academic Standards, School Choice, Reading First
- Academic Standards, Education Technology, Student Health/Safety
- Standards, Student Assessment, Public School Choice
- Choice, Supplemental Services, Student Assessment
- Academic Standards, Professional Development, Student Assessment
- Student Assessment, AYP, Reporting
- Reporting, Student Assessment, Accountability
- Teacher Qualifications, Parent/Community Component, Reading Programs
- Academic Standards, Reading First, Student Safety and Health
- Standards, School/student assessment, School choice
- Academic Standards, Reading First/Early Reading First Programs, Student Safety and Health
- Academic Standards, Student Assessment, Reporting
- Professional Development/School Support, Academic Standards, Student Health/Safety

**5. LIST THE THREE AREAS OF NCLB THAT OUR SEA IS THE LEAST PREPARED TO CURRENTLY COMPLY WITH.**

- Accountability/AYP, Data Management, Reporting
- Paraprofessional Qualifications, Low Performing Schools
- AYP, Paraprofessional Qualifications, Supplemental Educational Services
- Teacher Qualifications, Paraprofessional Qualifications, Data Management
- Teacher Qualifications, LEP, Low performing schools
- Low-performing schools, teacher qualifications, data management
- Continued Professional Development, Paraprofessional Qualifications, Low-performing schools
- Getting qualified teachers to remote geographic areas, Transportation for remote geographic areas, AYP for low socio-economic schools
- Teacher Qualifications, Reporting, Professional Development
- Teacher Quality, Paraprofessional Quality, Low-performing schools
- Paraprofessional qualifications, Data management, Students with Disabilities and Limited English Proficiency (LEP)
- Low-performing Schools, Teacher Qualifications, Educational Technology
- Pacific Islanders (ESL-a challenge for schools in Hawaii)
- The wedding of IDEA and NCLB

**6. LIST THE THREE AREAS OF NCLB THAT WILL POSE THE GREATEST CHALLENGES FOR OUR SEA OVERALL (IF ANY).**

- Accountability/AYP, Data Management, Reporting
- Accountability (AYP), Student Assessment, Teacher Qualifications
- AYP, Paraprofessional Qualifications, Teacher Qualifications
- Paraprofessional Qualifications, Students with Disabilities and Limited English Proficiency, Accountability/AYP
- Teacher Qualifications, AYP, Reporting
- Low-performing schools, teacher qualifications, data management
- Continued Professional Development, Paraprofessional Qualifications, Low-performing schools

- Funding to schools that need qualified teachers, ESL student requirements, Public school choice
- Low-performing schools, Teacher Quality, Paraprofessional Quality, Supplemental Resources
- Paraprofessional qualifications, Data management, Students with Disabilities and Limited English Proficiency (LEP)
- Accountability/AYP, Low-performing schools, Public school choice
- Teacher Qualifications, Paraprofessional Qualifications, Ed Tech (no money)

**7. LIST THE THREE AREAS OF NCLB THAT WILL PROVIDE THE GREATEST BENEFITS FOR OUR SEA (IF ANY).**

- Students with Disabilities and Limited English Proficiency, Supplemental Services, Educational Technology
- Academic Standards, Reporting, Professional Development
- Professional Development, Standards, Student Assessment
- Academic Standards, Student Assessment, Data Management
- Accountability, Standards, Professional Development
- Student Achievement, Professional Accountability, Academic Standards/Curriculum Practices
- Reporting, Student Assessment, Accountability
- Academic Standards, Educational Technology, Professional Development
- Standards, Raising student achievement, Focusing efforts on student achievement
- Academic Standards, Teacher Qualifications, Professional Development
- School Support and recognition, Reading First/Early Reading First Programs, Educational Technology
- Academic Standards, School Support, Professional Development

**PART D: SUBGRANTS**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
1. The successful implementation of the following subgrants is of critical importance within our state's educational environment:						
a. Even Start Family Literacy	29	65	0	0	0	6
b. Education of Migrant Children	24	47	24	0	0	6
c. Prevention and Intervention for Children Who Are Neglected, Delinquent, or At-Risk	35	65	0	0	0	0
d. Comprehensive School Reform	35	53	12	0	0	0
e. Teacher and Principal Training and Recruiting Fund	47	47	6	0	0	0
f. Enhanced Education Through Technology	35	53	12	0	0	0
g. Safe and Drug-Free Schools and Communities	35	59	6	0	0	0
h. Community Service Grants	29	53	18	0	0	0
i. 21 <sup>st</sup> Century Community Learning Centers	35	59	6	0	0	0

**Legend:**

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**PART E: ORGANIZATIONAL STRUCTURE**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
1. The current organizational structure of our SEA is adequate to promote effective NCLB implementation and future success in compliance with its requirements.	24	35	18	12	6	6
2. The current management system within our SEA is efficiently addressing the implementation of NCLB requirements.	12	47	29	6	6	0
3. The current implementation process is well defined by our SEA.	6	53	18	18	0	6
4. Input on effective implementation strategies is gathered from all levels of our SEA.	0	53	24	18	0	6
5. The implementation of NCLB requirements is being effectively coordinated across areas of responsibility.	6	35	47	12	0	0
6. There is collaboration among our SEA divisions in the implementation of NCLB.	6	59	29	6	0	0

**Legend:**

\*SA = Strongly Agree, A = Agree, N = Neither Agree/Disagree, D = Disagree, SD = Strongly Disagree, DK/NA = Don't Know/Not Applicable

**7. WHAT CHANGES IN ORGANIZATIONAL STRUCTURE COULD IMPROVE NCLB IMPLEMENTATION EFFORTS IN OUR SEA (IF ANY)?**

- More staffing resources needed.
- An oversight office dedicated to monitoring implementation of NCLB.
- I hope this will be one of the outcomes of this study.
- Clearly identifying data, responsibilities, roles of SEA – local schools.
- Rearranging the chairs on the deck of the Titanic will not help! The "ship" needs a new engine room! Fewer navigators and a stronger hull!
- Stronger support to the complex area - infrastructural support.
- Funding to go directly to LEA's.
- Not structural--more interoffice communication--get out of the silos.

**PART F: ACCOUNTABILITY**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
1. A single, statewide accountability system is applied to all public schools and LEAs equally.	41	53	0	6	0	0
2. All public school students are included in our state accountability system.	47	53	0	0	0	0
3. Current state accountability plans are adequate to bring all students to 100 percent proficiency in reading/language arts and mathematics within 12 years.	6	13	50	25	0	6
4. Our SEA makes appropriate annual decisions about the achievement of all public schools and LEAs.	12	53	18	12	0	6
5. The state definition of AYP is based primarily on our state's academic assessments.	18	71	6	0	0	6
6. Our SEA is providing appropriate assistance to schools in implementing the requirements of NCLB.	12	35	29	18	0	6
7. Current state plans place an appropriate level of accountability on schools for student performance.	6	71	12	12	0	0
8. Current state plans adequately reward successful schools.	0	13	38	50	0	0
9. Current state plans adequately identify low-performing schools.	6	71	6	12	6	0
10. Current state plans provide adequate assistance to low-performing schools	0	41	12	24	18	6

Legend:  
 \*SA = Strongly Agree, A = Agree, N = Neither Agree/Disagree, D = Disagree, SD = Strongly Disagree, DK/NA = Don't Know/Not Applicable

**PART F (Continued):**

STATEMENTS ON ASSESSMENT INSTRUMENT	SA (%)	A (%)	N (%)	D (%)	SD (%)	DK/NA (%)
11. Current state plans adequately sanction failing schools.	0	6	38	44	6	6
12. Our state plan to provide supplemental educational services is adequate to promote the meeting of state student performance requirements under NCLB.	6	35	24	29	6	0
13. Our state plan to ensure public school choice is adequate to promote the meeting of state student performance requirements under NCLB.	6	65	18	6	6	0

Legend:  
 \*SA = Strongly Agree, A = Agree, N = Neither Agree/Disagree, D = Disagree, SD = Strongly Disagree, DK/NA = Don't Know/Not Applicable

**14. PLEASE LIST SPECIFIC STATE ACCOUNTABILITY POLICIES YOU BELIEVE SHOULD BE MODIFIED TO IMPROVE THE QUALITY OF NCLB IMPLEMENTATION (IF ANY).**

- Do not know.
- The NCLB requirement that ALL students be tested on the state assessment tests.
- AYP. Paraprofessional Qualifications. Supplemental Services. School Choice.
- Rewards. Sanctions.
- Funding to go directly to LEA's. Grants should be given to lower achieving schools. 2002-03 school year, very little money went to areas in the most need.
- Do away with NCLB.
- Punishing schools by listing them as low performing. Punishing educators-we are the good guys!

**15. PLEASE LIST ANY NEW STATE ACCOUNTABILITY POLICIES THAT SHOULD BE ADDED (IF ANY).**

- Do not know.
- Documenting teacher effectiveness.
- To enable/facilitate implementation of "corrective action" and "restructuring" options, related limitations (e.g., transfer process) are needed in the contracts for teachers and school administrators.
- Provide more support to hard pressed regions. Like SES, give a greater percentage of funds to LEA's with high poverty and remote geographic areas.