



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Brenda Cassellius
Commissioner of Education
Minnesota Department of Education
1500 Highway 36 West
Roseville, Minnesota 55113

JUL 08 2011

Dear Commissioner Cassellius:

During the week of May 2 - 6, 2011, a team from the U.S. Department of Education's (ED) Student Achievement and School Accountability Programs (SASA) office reviewed the Minnesota Department of Education's (MDE) administration of Title I, Section 1003(g) (School Improvement Grants (SIG)) of the Elementary and Secondary Education Act of 1965 (ESEA), as amended. As part of its review, the ED team interviewed staff at the State educational agency (SEA) and two local educational agencies (LEAs). The ED team also conducted site visits to two schools implementing the SIG intervention models, where they visited classes and interviewed school leadership, teachers, parents, and students. Enclosed you will find ED's final monitoring report based upon this review.

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

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

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

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

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

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

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

The ED team would like to thank Patricia King, Director, Office of Turnaround Schools and her staff for their hard work and the assistance they provided prior to and during the review in gathering materials and providing access to information in a timely manner.

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

Sincerely,



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

Enclosure

cc: Patricia King, Director, Office of Turnaround Schools

Minnesota
 Targeted Monitoring Review of
 School Improvement Grants (SIG) under section 1003(g) of the
 Elementary and Secondary Education Act of 1965
 May 2-6, 2011

BACKGROUND

Overview of SIG Schools in Minnesota

Tier	Number of FY 2009 Eligible SIG Schools	Number of FY 2009 Served SIG Schools
Tier I	21	11
Tier II	13	8
Tier III	260	0

Implementation of SIG School Intervention Models

Models	Number of Schools implementing the Model
Turnaround	3
Transformation	16
Restart	0
Closure	0

MONITORING TRIP INFORMATION

Monitoring Visits

LEA Visited	<i>East Central Public School District (ECPS)</i>
School Visited	<i>East Central High School (ECHS)</i>
Model Implemented	<i>Transformation</i>
FY 2009 Funding Awarded (over three years)	<i>LEA Award (for 1 SIG school): \$1,000,473 School-level funding: \$1,000,473</i>
LEA Visited	<i>Minneapolis Public Schools (MPS)</i>
School Visited	<i>Lucy Craft Laney@ Cleveland Park Elementary (LCL)</i>
Model Implemented	<i>Turnaround</i>
FY 2009 Funding Awarded (over three years)	<i>LEA Award (for 6 SIG schools): \$8,050,000 School-level funding: \$1,600,000</i>
SEA Visited	<i>Minnesota Department of Education</i>

Staff Interviewed

- *MDE Staff: Deputy Commissioner, OTAS Director, Grant Specialist, Monitor, Finance Officer*
- *ECPS Staff: Superintendent, Assistant Superintendent/Principal, Board Chair, Turnaround Officer*
- *ECHS Staff: Elementary Principal, Assistant Superintendent /Secondary Principal, School Administrative Manager, 4 Teachers, 5 Parents, ~28 Students, and 2 Classroom Visits*
- *MPS Staff: Director of Strategic Planning, Academic Reform Specialist*
- *LCL: Principal, Assistant Principal for grades Pre K-5, Assistant Principal for Middle Grades, School Administrative Manager, 5 Teachers, 3 Parents, ~30 Students, and 4 Classroom Visits*

U.S. Department of Education Staff

Team Leader	Susan Wilhelm
Staff Onsite	Sharon Hall and Kim Hicks

OVERVIEW OF MONITORING REPORT

The following report is based on U.S. Department of Education's (ED) on-site monitoring visit to the Minnesota Department of Education (MDE) from May 2-6, 2011 and review of documentation provided by the State educational agency (SEA), local educational agencies (LEAs), and schools. The report consists of three sections: *Summary and Observations*, *Technical Assistance Recommendations*, and *Monitoring Findings*. The *Summary and Observations* section describes the implementation of the SIG program by the SEA, LEAs, and schools visited, initial indicators of success, and outstanding challenges being faced in implementation. This section focuses on how the SEA, LEAs, and schools visited are implementing the SIG program with respect to the following five areas: school climate, staffing, teaching and learning, use of data, and technical assistance. The *Technical Assistance Recommendations* section identifies strategies and resources for addressing technical assistance needs. The *Monitoring Findings* section identifies areas where the SEA is not in compliance with the final requirements of the SIG program and indicates required actions that the SEA must take to resolve the findings.

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

SUMMARY AND OBSERVATIONS

Climate

East Central High School

East Central High School (ECHS) was identified as one of Minnesota's persistently lowest-achieving schools in January 2010. It was identified as one of the bottom five percent of secondary schools eligible for but not receiving funds under Title I of the Elementary and Secondary Education Act of 1965, as amended. It consists of one K-12 school building. The superintendent's office is housed in the school building and she is an integral part of the school. Based on the MDE Quality Review Report of April 2010, a report of observations and analysis to inform decision making and improve school quality, and through interviews with East Central Public School District (ECPS) staff and ECHS staff it was reported that prior to the implementation of the transformation model, the school's former principal was not providing leadership in school management, curricula, or teachers' quality of instruction. Because the core curriculum in the past had not been challenging for students, a key component of transformation model implementation has been focused on providing rigorous content for students in the areas of math, science, and foreign languages. During the interviews, many of the students commented on the lack of complexity in some of their subjects and indicated that they wished that there were advanced placement classes available for the English program or that teachers would require more writing in English; however, students said there have been many

improvements from the previous year. The principal has established education programs such as Advanced Placement, International Baccalaureate, and the College Level Examination Program by providing opportunities for teachers to receive the certification needed to administer these types of classes. As part of implementing the transformation model, the current administration has introduced strategies to assist teachers in providing comprehensive and effective guidance to support the students. Two models are the Charlotte Danielson Model and the Madeline Hunter Model. A Professional Learning Community (PLC) was also established to provide teachers with quality professional development. The recently hired assistant superintendent/secondary school principal observed that many teachers had not been evaluated for many years and implemented classroom assessments and evaluations. Visits by the principal were initially viewed as being intrusive; however, once teachers recognized that the evaluations were being used to improve teaching methods they embraced the visits and ask for feedback to support professional growth. Teachers also noted the increased visibility of the administration staff as a positive aspect of the implementation of SIG grant. The current administration has also added an Advisory Period to enable students to have extra learning time and one-on-one attention; however, the students interviewed indicated that this use of time was not structured adequately and therefore, may not be beneficial for struggling students.

Lucy Craft Laney

MDE had initiated program evaluations prior to receiving SIG funds in September 2010. Based on the MDE Quality Review Report of April 30, 2010, parents and students at Lucy Craft Laney (LCL) reported that there was a marked improvement in the overall climate of the school in comparison to last year. In response to that report, teachers and administrators received training in Positive Behavioral Interventions and Support (PBIS) and the school hired a full time coach to train and support teachers in dealing with behavioral issues. Teachers became more consistent in implementing behavior strategies, but there were still many behavioral incidents that detracted from learning. There were some classrooms where students were engaged, while in others students interrupted students and the teacher. There were limited displays of student work in hallways and classrooms. Attendance continued to be below the state level; now the students' parents get a call on the same day they are absent.

Interviews at LCL indicated that in previous years the climate was chaotic, both in and outside of classrooms. Student fights, disrespectful behavior displayed to all adults, students being out of the classrooms made teaching and learning difficult. About one-third of the students had been suspended. The veteran staff did not want to be there or to change their practices. This year, however, staff reported that student behavior has improved significantly, that more learning has been taking place, parents report they were experiencing a warmer climate and both parents and their students reported that they wanted to be in school.

Staffing

East Central High School

Changes in Leadership

Based on the needs assessment found in the Quality Review Report and interviews with staff, the previous principal provided very little leadership in the areas of curriculum, the quality of teaching, or formative assessment strategies. Initially there was one principal for the K-12 school who had already announced his resignation prior to the awarding of the SIG grant. As a result of the Quality Review Report needs assessment, the superintendent and school staff recognized the need to hire two principals: one for the elementary grades and one for the secondary grades. The secondary level was awarded the SIG grant. The assistant to the superintendent also serves as the high school secondary principal performing duties assessed as necessary under the Quality Review Report such as teacher observations and evaluations and implementing curriculum mapping. The special education teacher serves as the ECPS Turnaround Officer under the SIG grant.

The principal for the high school was hired July 29, 2010 which was also the day that the school was informed that it would be receiving the school improvement grant. The superintendent was not aware that the school would be approved for the grant; therefore the principal was not hired as a result of receiving the SIG award. However, the principal was hired using criteria based on the needs identified in their application for the grant.

Changes in Staff

The school staff wanted to focus on their special education population, reducing classroom sizes, and offering more courses. The person who had been the special education teacher was promoted to the special education supervisor under the SIG grant allowing the district to hire an additional special education teacher. A part-time teaching position held by the secondary school principal provides the assistance needed to reduce classroom sizes and offer more courses in required academic subjects.

Lucy Craft Laney

Changes in Leadership

In the Minneapolis Public Schools (MPS), several schools had already implemented a similar school improvement model, the Fresh Start initiative. Fresh Start is an intervention used by the MPS to make rigorous improvements in struggling schools; it requires all existing staff positions to be posted and open for interviews. Because the principal at LCL had been replaced just a year before, as part of the Fresh Start school reform initiative, no additional change in leadership was required.

Based on the needs assessment and interviews with school staff, prior to the implementation of the turnaround model, there had been an increase in student fighting, disrespectful behavior

displayed toward adults, and truancy. Further, about one-third of the students had been suspended. The MPS hired a School Administrative Manager for the school to manage the behavior issues so as to allow the principal to focus on teacher quality and curricula.

Changes in Staff

Under the MPS's Fresh Start initiative, current teachers and other staff had to interview for positions in the school. All existing staff positions were posted and opened for interviews. For those schools that used the Fresh Start initiative, current teachers and others had the opportunity to interview for those positions. Staff who interviewed but were not chosen at their original schools could be considered for other positions in the LEA. However, during interviews, LEA staff reported that union contracts prevented the MPS from considering instructional effectiveness when making staffing decisions. MPS did not have a large pool of qualified teaching staff to place in struggling schools. Teachers have the right to transfer from school to school every year and often elect to go to schools that are not labeled as struggling. Further, some teachers have left the LEA as a result of layoffs. The ability to transfer annually also means there is little stability for students.

Teaching and Learning

East Central High School

Based on the Quality Review Report, ECHS provides students with pockets of extremely good, enjoyable and challenging experiences through the school band, theater, 2 and 3-dimensional art programs, and after school sports. However, numerous areas of improvement in teaching and learning were identified: (1) ensure that the principal's role focuses on raising student achievement by monitoring and evaluating the quality of student learning and achievement—through multiple strategies including (a) implementing a program of lesson observations; (b) adopting a system to evaluate teachers' lesson planning, (c) developing school-wide professional development plans targeted at the identified training needs of teachers to promote higher student achievement; (2) ensure that curriculum scheduling avoids extremely large and small classes, that common preparation time is provided, that there is greater variation in the program daily, and that college and career guidance starts earlier; and (3) improve the quality of student learning by ensuring that teachers engage learners, teachers raise their expectations of student achievement, and teachers differentiate their methodologies to meet the needs of all students in their classes.

ECHS's work plan for the SIG application addresses key requirements of the transformation model related to teaching and learning. These requirements respond to areas that ECHS identified where improvement is needed. Specifically, (1) staff participating in weekly PLCs, including embedded professional development and regular staff meetings, which will help foster an atmosphere of collegiality. During PLCs, staff will work on curriculum mapping and development, collegial review of lesson plans with feedback, and development of authentic instruction and assessment, (2) staff providing student interventions in reading and mathematics, i.e., summer school for reading, mathematics, and enrichment course offerings during the school year, (3) adopting an observation/evaluation model, (4) mentoring program for new teachers, and

(5) researching best practices in special education and Response to Intervention and piloting alternative models, such as co-teaching, aligning curriculum, and researching instruction methods.

Through the professional learning community, teachers are focusing on curriculum mapping and backward design and instructional practices that foster student engagement and active learning experiences. Advisor/Advisee time, one component of the increased learning time model implemented at ECHS, offers opportunities for sustained silent reading, peer tutoring, and homework help. The other component is summer school, which is being planned to focus on core academic subjects; students are invited to provide input on what courses they would like offered this summer.

Lucy Craft Laney

Based on the 2010 MDE Quality Review Report, three areas where the school does well related to teaching and learning were identified: (1) its academic celebrations motivates students to work hard and creates a sense of pride in their work, (2) the administration visits classrooms frequently giving regular feedback to teachers enabling them to further develop their skills and meet the needs of students more effectively, and (3) the school has well-defined teams and regular meetings resulting in meaningful pedagogic discussion. In the same report, five areas for improvement were identified: (1) continue to focus intensively on learning and teaching, with particular attention to the further development of teachers' capacity to deliver differentiated instruction based on data to meet the diverse learning needs of students in all classes and grades, (2) ensure consistency in the use of learning objectives to drive lesson structure and provide the focus for review and reflection at the end of each lesson, (3) enhance teacher and student understanding of what high-quality work looks like by creating, over the year, portfolios of such high-quality work along with the related rubrics and clear explanations as to how each piece selected meets the definition of high quality, (4) provide professional development for teachers aimed at developing short-term goals, or next learning steps, for each student to clarify for the students the learning that will accelerate their immediate progress, and (5) create a plan that ensures that teachers and students use technology consistently throughout the school and in all subjects.

LCL's work plan included in the MPS SIG application includes a timeline that addresses implementation of key requirements of the turnaround strategy in the 2010-2011 school year. These strategies also reflect identified areas of improvement in the Quality Review Report. Specifically related to teaching and learning, the application plans for: (1) extending the school day for an hour to provide additional intervention time for students, (2) providing classroom teachers with a 90 minute block to participate in professional learning communities, (3) implementing a system for measuring the fidelity of classroom-level implementation of evidence-based instructional practices, and (4) job-embedded professional development and reduction of pull-out professional development.

Interviews with LEA and school staff reflected that there was alignment among the areas noted in the needs assessment, the SIG application, and current school practice. The administration has increased the focus on teaching and learning. Professional learning communities in K-2, 3-5,

and 6-8 used student data to determine their learning needs. Professional development topics included co-teaching, managing small group instruction, using data to inform instruction, teaching reading across the content areas, and culturally relevant teaching strategies. Examples of instructional practices implemented during increased learning time include corrective reading and mathematics strategies, reading mastery, and math recovery.

Use of Data

East Central High School

One of the areas identified for improvement in the Quality Review Report was ensuring that teachers track, analyze, and record student achievement so that the principal knows where remedial strategies are required and could implement them before the actual tests are taken. Also, there were no systems to ensure that interim assessment measures, including teachers' assessments were used formatively. To address this, ECHS's SIG work plan indicates a focus on (1) using the St. Croix River Education District (SCRED) for collection and analysis of data, and (2) understanding current performance data and current models of service and gaps in learning using current models.

Based on interviews with the principal and superintendent, baseline data using multiple sources, including NWEA Measures of Academic Progress (MAP), are being collected this year. Combined with data from MCA-II, the statewide assessment, ECHS will construct SMART goals for Adequate Yearly Progress (AYP) by September 2011. The LEA is now developing a district report card that will report data for assessments, graduation rate, and attendance. Although they do not now have data to know if their program implementation is successful, the leadership team reports that "it feels like it's going in the right direction."

Lucy Craft Laney

The 2010 MDE Quality Review Report identified the need to improve the use of data by developing a clear system of data collection, analysis, and use to inform classroom practice and interventions for all students. The Quality Review also reports that while the school collects both summative and formative data that is used to inform classroom instruction, the use of differentiation strategies is still a work in progress.

LCL's SIG work plan addresses (1) the use of formative assessments and data to identify strategies for the improvement of reading and mathematics, including professional development in administration and use of various assessments and protocols to examine student work and (2) developing a clear system of data collection, analysis and use to determine classroom practice and interventions for all students; LCL now uses the MAP to track student growth three times a year.

Staff reports that they are using multiple sources of data to plan professional development and student instruction. Based on data, instruction in the core curricular areas has become more

focused and interventions such as flexible grouping are targeted to students who have learning gaps. The school quality review helped staff focus on critical elements of student learning and best instructional practices. Students who are in low proficiency categories are monitored weekly and instructional adjustments are considered. In the middle school, students are developing goal sheets based on their individual achievement data; these help students focus on their learning goals.

Technical Assistance

SEA Support to LEAs and Schools

During interviews, ECPS and MPS staff reported that the MDE was very accessible during the planning process. LEAs received a lot of feedback during the application and amendment process; the MDE made several site visits during this time. Both LEAs also commented on the MDE's current and future plans for training on the use of student data. Although the MDE has provided data training previously, that training was focused on district staff. The training has now been expanded to include principals and school staff to help them acquire the skills and knowledge necessary to gather data and to apply the data to inform the modification of instruction. Specifically, in ECPS, the MDE assisted the LEA in the hiring of the superintendent and secondary school principal by developing criteria needed for hiring and/or replacing the superintendent and the principal. The MDE staff hired a monitor to focus on grant management and compliance. Additionally, the MDE is providing flexibility for its staff in work schedules (alternate work schedules, work-from home, and flexible work schedules). In some cases, staff works off-site to be close to the LEAs that are assigned to them. This has allowed the MDE staff to be in the LEAs more frequently.

LEA Support to Schools

There was not a formal LEA process to monitor the schools' implementation of the selected models; however both LEAs are continuously involved in the SIG implementation process. In ECHS, the principal commented on the importance of the School Board's support for SIG. The school board helped to write the grant and supported a scheduling change. The superintendent and assistant superintendent/principal played an integral part in the management and instruction of the school. Because the high school had been lacking in data collection, they have focused on providing data training to their staff as well as identifying the types of data that will yield the best information. In addition, the assistant superintendent/principal has focused on professional practice of instruction and assessment and emerging educational practices to support his teaching staff.

TECHNICAL ASSISTANCE RECOMMENDATIONS

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

The MDE is providing ongoing technical assistance to the LEAs and is responsive to requests from the LEAs. However, there are several topics that the LEAs need focused technical assistance which are time-sensitive. The parents in ECPS and MPS did not feel as if they were included in the process or had been fully informed about the changes proposed and implemented in the school improvement grant. Parents either read about the grant award in the newspaper or noticed a change in the school. The following technical assistance is recommended for improving SIG administration:

- Provide technical assistance to ECPS and MPS on strategies and methods to improve parent and community engagement, i.e., plan and hold meetings for parents and community members about the grant and include parents in the evaluation of the strategies that are implemented as part of the grant,
- Provide guidance on the appropriate and meaningful use of increased learning time,
- Provide guidance on assessment literacy techniques; understanding assessments and other evidences of student performance and the resulting data to inform instruction,
- Provide strategies for using professional learning communities and professional development practices so that instructional strategies are implemented with fidelity in the classroom, and
- Provide additional resources for teaching and learning; strengthening the selection and use of intervention models.

The MDE must submit to the Department their process and timeline to provide technical assistance in the identified areas such that the LEAs receive this technical assistance in time to inform LEA practices in the 2011-2012 school year.

MONITORING FINDINGS

Summary of Monitoring Indicators

Critical Element	Requirement	Status	Page
1. Application Process	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	
2. Implementation	The SEA ensures that the SIG intervention models are being implemented consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	11
3. Fiscal	The SEA ensures LEAs and schools are using funds consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010)) ; §1114 of the ESEA; and Office of Management and Budget (OMB) Circular A-87]	N/A	
4. Technical Assistance	The SEA ensures that technical assistance is provided to its LEAs consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	
5. Monitoring	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended	Finding	11

	(75 FR 66363 (October 28, 2010))]		
6. Data Collection	The SEA ensures that data are being collected consistent with the final requirements of the SIG program. [Sections II and III of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	

Monitoring Area: School Improvement Grant

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

Finding: The MDE did not ensure that schools implementing the turnaround model rehire no more than 50 percent of the staff. In MPS, principals did not use locally adopted competencies to measure the effectiveness of staff who can work within the turnaround environment to meet the needs of students. The teacher contracts prevent this from happening. MPS’s current staffing rules primarily consider seniority and license area for employment and placement decisions. For example, tenured teachers who were laid off are rehired to fill vacancies before probationary teachers are recalled.

Citation: Section I.A.2(a)(1)(ii) of the final requirements stipulate that as part of the turnaround model an LEA must “(ii) using locally adopted competencies to measure the effectiveness of staff who work within the turnaround environment to meet the needs of students (A) Screen all existing staff and rehire no more than 50 percent; and (B) Select new staff.” (75 FR 66363 (October 28, 2010)).

Further action required: The MDE must develop and submit to ED a plan for how it will ensure that the LEAs funded in the FY 2010 competition to implement the turnaround model develop and use locally adopted competencies in its hiring process. The MDE must provide evidence of the development and use of these locally adopted competencies by LEAs funded in the FY 2011 competition.

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

Finding: The SEA did not ensure that the LEAs monitor the schools consistent with the final requirements of the SIG program. Although the SEA and the LEAs are providing ongoing technical assistance to the schools in the SIG program, the SEA has not established an expectation, a process, or a timeline for the LEA to monitor these schools.

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

Further action required: The MDE must submit to ED the process and timeline that LEAs must implement to monitor schools in the SIG program, as well as how these are communicated to the LEAs.