



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

The Honorable Roger D. Breed  
Commissioner of Education  
Nebraska Department of Education  
301 Centennial Mall South  
Lincoln, Nebraska 68509

JUL 20 2011

Dear Commissioner Breed:

During the week of May 16 - 20, 2011, a team from the U.S. Department of Education's (ED) Student Achievement and School Accountability Programs (SASA) office reviewed the Nebraska Department of Education's (NDE) 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 NDE 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 NDE 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.

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

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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 NDE 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 Nebraska at the time and locations of ED's onsite review. The NDE 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 Diane Stuehmer, Title I Director 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 Nebraska.

Sincerely,



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

Enclosure

cc: Diane Stuehmer, Title I Director

**NEBRASKA**  
**Targeted Monitoring Review of**  
**School Improvement Grants (SIG) under section 1003(g) of the**  
**Elementary and Secondary Education Act of 1965**  
**May 9-13, 2011**

**Overview of SIG Schools in NEBRASKA**

**BACKGROUND**

**Overview of SIG Schools in NEBRASKA**

Tier	Number of FY 2009 Eligible SIG Schools	Number of FY 2009 Served SIG Schools
Tier I		7
Tier II		0
Tier III		0

**Implementation of  
SIG School Intervention Models**

Models	Number of Schools implementing the Model
Turnaround	0
Transformation	7
Restart	0
Closure	0

**MONITORING TRIP INFORMATION**

**Monitoring Visits**

<b>LEA Visited</b>	<i>Winnebago Public Schools</i>
<b>School Visited</b>	<i>Winnebago High School</i>
<b>Model Implemented</b>	<i>Transformation Model</i>
<b>FY 2009 Funding Awarded (over three years)</b>	<i>LEA Award (for 1 SIG school): \$1,961,423.00 School-level funding: \$1,961,423.00</i>
<b>LEA Visited</b>	<i>Lincoln Public Schools</i>
<b>School Visited</b>	<i>Elliott Elementary School</i>
<b>Model Implemented</b>	<i>Transformation Model</i>
<b>FY 2009 Funding Awarded (over three years)</b>	<i>LEA Award (for 1 SIG school): \$3,348,743.00 School-level funding: \$3,348,743.00</i>
<b>FY2009 Funding Awarded for Three Years</b>	<i>FY2009 SIG Awards (For 7 LEAs:) \$12,663,476.00 School Level Funding:</i>
<b>SEA Visited</b>	<i>Nebraska Department of Education</i>

**Staff Interviewed**

- *Nebraska Department of Education Staff*
- *Winnebago Public Schools Staff*
- *Winnebago High School Staff: Principal, School Leadership Team, 5 Teachers, 3 Parents, Students, and 2 Classroom Visits*
- *Lincoln Public Schools Staff*
- *Elliott Elementary School Staff: Principal, School Leadership Team, 9 Teachers, 17 Parents, Students, and 3 Classroom Visits*

**U.S. Department of Education Staff**

<b>Team Leader</b>	<i>Susan Wilhelm</i>
<b>Staff Onsite</b>	<i>Danita Woodley and Elois Scott</i>

## **OVERVIEW OF MONITORING REPORT**

The following report is based on U.S. Department of Education's (ED) on-site monitoring visit to Nebraska from May 9-13, 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 are we approving or endorsing any particular practices or approaches by citing them.

## **SUMMARY AND OBSERVATIONS**

### **Climate**

School and local educational agency (LEA) staff at Winnebago Public Schools and Lincoln Public Schools both reported that prior to the implementation of their SIG programs they were concerned that they had been identified as persistently low performing. However, as a result of the designation, both sites attempted to identify and address issues that contributed to this designation. At both Winnebago High School (WHS) and Elliott Elementary School (EES), parents, students and teachers were surveyed in an attempt to quantify school climate. Overall, both sites indicated significant improvements in the climate as a result of the SIG program.

### **Winnebago High School/Winnebago Public Schools (Transformation)**

Winnebago High School is located on an Indian Reservation and serves predominantly Native American students. Based on needs assessment information in Winnebago Public School's (WPS) SIG application, teen parents at WHS do not always complete high school and WHS was identified as a Tier I school due to its graduation rate. The needs assessment also indicated that the strategies the school was using to address the needs of struggling students did not have the intended result. Interviews with school leadership further indicated that cultural rituals impact attendance (e.g., observance of death, working at Pow Wows). School leadership also reported that prior to the implementation of the transformation model during the 2010-2011 school year, WHS's culture was characterized by high absenteeism, truancy, and teenage pregnancy. During interviews, the leadership team indicated that efforts were implemented to address these issues, such as assigning an Outreach Coordinator, offering a (Twilight) after school program, and utilizing a truancy officer. To build on these existing efforts, the SIG application indicates that the Nebraska Department of Education (NDE) and the LEA staff meet quarterly to develop positive ways to work towards positive change. Interviews revealed that new parent teacher organizations were formed to help build a positive school climate, develop grade level

assemblies for students to address climate, and sponsor activities and speakers to provide professional development for teachers. During interviews, teachers and members of the leadership team revealed that these changes were important in supporting positive behavior interventions and improving instruction as well as the school culture. In one classroom visited, students said they felt safe at the school especially with more principal visibility in the hallways and classrooms.

**Elliott Elementary School/Lincoln Public Schools (Transformation)**

According to interviews with Lincoln Public Schools (LPS) staff and Elliott staff, prior to the implementation of the transformation model during the 2010-2011 school year Elliott's culture was characterized as one where staff needed to be trained in community building in order to collaborate and become partners with families. Further, the needs assessment identified the following skills needed for staff: how to build a collaborative process, how to build leadership across communities, how to develop consensus, and how to negotiate mediate and manage conflict. To address these issues, Elliott focused on classroom management and vertical planning. When parents were asked about changes at the school, they reported that they felt welcomed in the school. The new principal indicated a focus on creating a positive culture that embraces diversity. Parents also praised the new principal for establishing an environment of respect for diverse populations and for encouraging a culture of learning.

***Staffing***

***Changes in Leadership***

**Winnebago High School/Winnebago Public Schools (Transformation)**

The new WHS principal started work on August 1, 2010. WPS hired the principal as required by the transformation model; however, the WPS leadership team reported that they were pleased with the previous principal and initially, changes in leadership caused some issues with climate. The Winnebago Indian Reservation is located in a small rural area and the school and district leadership staff is one in the same and juggle dual responsibilities with one single K-12 school, housed in one building. The previous Grade 9-12 principal was assigned to K-6 as an instructional leader. WPS recruited for the Grade 9-12 principal position and received 20 applications to consider. Of those, 10 interviews were conducted. The new principal was selected as the best candidate based on selection criteria and his prior experience in leading school improvement efforts.

**Elliott Elementary School/Lincoln Public Schools (Transformation)**

The new EES principal started work on July 1, 2010. LPS hired the principal based on her extensive knowledge of the diverse community and her work with low performing Title I schools. According to interviews, the LEA began the process of replacing the principal to meet leadership needs by posting a principal job description with the transformation model requirements and interviewing candidates using transformation leader criteria, such as a proven track record for improving student achievement. Interview data indicated that the principal had experience, vision, tireless commitment and passion to meet the demands associated with implementing the transformation model. During interviews, parents praised the principal for establishing a framework for rigorous academic standards and welcoming a family-friendly environment.

***Changes in Staff***

**Winnebago High School/Winnebago Public Schools (Transformation)**

During the WHS leadership interviews, staff reported that they hired two staff positions - project manager and a data specialist - as part of the SIG grant. The needs assessment described the

responsibilities of the intervention project manager as working with the school principal and district administrators to coordinate the implementation of SIG activities. This is done by conducting ongoing evaluations of progress and ensuring appropriate collection and management of data on goals established to increase student achievement. During interviews, the WHS leadership team described how the Data Specialist meets regularly with teachers to help teachers set student goals, and keep students on target.

**Elliott Elementary School/Lincoln Public Schools (Transformation)**

During the EES leadership interviews, staff reported that they hired several staff positions as a result of the SIG grant – project manager, a data specialist, and a Behavior Intervention Support Team (BIST). EES staff reported that a consultant from the BIST comes to the school once a week to meet with teachers and teams to provide building level professional development sessions. Respondents from EES and LPS described incentives used to recruit and retain staff. EES offers incentives in the form of college credits towards a Master’s Degree at the University of Nebraska (Lincoln), cohort. Staff revealed that additional credits ultimately led to increase in pay. Teachers reported that they appreciated the opportunity to participate in the cohort because it provided an opportunity to discuss real classroom experiences and link to school reform efforts. In addition to the UNL cohort program, EES offers additional incentives in the form of professional development opportunities for staff. Interviews revealed that two (2) full-time instructional coaches were employed at EES, as part of the SIG grant.

**Teaching and Learning**

**Winnebago High School/Winnebago Public Schools (Transformation)**

The school needs assessment indicated that staff needed professional development to improve student engagement and to develop students’ awareness of the need to accept responsibility for his/her learning. WHS teachers were provided training and assistance in how to utilize technology in the classroom and how to link instruction to curriculum goals as a strategy for improving student engagement. However, based on classroom observations at WHS, the use of the Smart Boards was rudimentary, at best. During teacher interviews, teachers reported that consultants were hired to provide embedded professional development, observe classrooms, and provide ongoing feedback to help teachers set curriculum goals.

**Elliott Elementary School/Lincoln Public Schools (Transformation)**

The school needs assessment indicated that staff needed access to an instructional coach who could provide ongoing, high-quality and job-embedded professional development and feedback. To address this, LPS and EES staff reported that instructional coaches work with the teachers to identify professional development. Teachers reported that high-quality professional development is provided through a train-the-trainer model. Classroom observations indicated that students are involved in setting academic goals to track their learning progress. Interviews with teachers indicated that professional development has strengthened instruction and has been a key in improving teaching and learning at EES. As part of implementing the transformation model, staff were trained in professional learning communities (PLCs) on topics such as curriculum implementation with fidelity, instructional coaches and professional development, data systems, teacher and principal effectiveness through the implementation of a newly developed appraisal system built on research (Charlotte Danielson) and cultural proficiency training and support. Staff also reported that students are more engaged with the new instructional strategies and use of technology in the classroom.

Use of Data

**Winnebago High School/Winnebago Public Schools (Transformation)**

The school needs assessment indicated that although WHS seeks to use student data to guide decisions about instruction, this is not occurring to the extent needed because limited contract time restricts the data team and others from meeting, and staff are unclear about how to effectively use data. The needs assessment also indicated that prior to the implementation of the SIG grant there was a need to find a way to maximize meeting time to collaborate about new teaching strategies to use in the classroom. To address these issues, WHS hired a Data Specialist to work closely with teachers to analyze and interpret data. WPS leadership team reported that they now focus on district assessment data, classroom performance data, and teacher and student attendance data. Also, as a result of the SIG grant, WPS staff received training to effectively use data to identify and implement instructional programs that are research based and vertically aligned with State academic standards.

**Elliott Elementary School/Lincoln Public Schools (Transformation)**

EES' needs assessment indicated that 37% of the student population is English Language Learners (ELLs). Further, the needs assessment indicated the need to bring EES staff to a greater level of proficiency in meeting the academic needs of students from diverse populations. To address these issues, a PLC leadership team was established with building representatives. PLC leaders meet monthly to share data related to formative assessment results that indicate progress toward quarterly instructional targets. Four vertical teams have been formed with grade-level teachers, special education and ELL departments, the intervention specialist, and instructional coaches for the purpose of expanding time for professional collaboration, strengthen vertical team alignment, and encouraging data driven decisions. Additionally, staff use data from open house and conference attendance to identify parents who are reluctant to come to the school to develop plans to encourage them to participate. This strategy helps EES staff better meet the needs of diverse learners. Additionally, a data system of support (Pinnacle Insight Analysis) was implemented, which includes onsite training on how to utilize formative and summative data to inform instruction in meeting the needs of diverse student populations.

Technical Assistance

During interviews, the Nebraska Department of Education (NDE) staff described the ongoing and systemic support it has provided to the LEAs and schools in developing their SIG applications and providing oversight in the implementation of SIG programs. The NDE staff explained that it supported LEAs early in the application process through conference calls, webinars, and onsite meetings. This included providing SIG tools and resources from the Center on Innovation and Improvement (e.g., SIG Handbook), providing feedback (oral and written), and working with LEAs to revise preliminary budgets. Interviews also indicated that both schools hired an intervention project manager whose role includes providing technical assistance. Staff at both sites reported that the SEA supported them during the application process via webinars, meetings and ongoing conference calls, as needed. In terms of technical assistance that LEAs are providing to their respective schools, school leadership and district staff reported that the SIG coordinator has a strong understanding of the needs of each SIG program. The NDE has completed onsite monitoring visits for all of the SIG grantees. Follow-up technical assistance is designed based on annual monitoring and desk audits. Interviews with the NDE staff revealed that technical assistance workshops were held by the NDE in June to assist schools in preparing SIG applications.

## **TECHNICAL ASSISTANCE RECOMMENDATIONS**

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

### **Issue 1: Attendance Strategies**

The needs assessment included with Winnebago's SIG application identified attendance problems associated with cultural observances that impact graduation rates. The needs assessment also outlines strategies to address these issues; however, it is unclear whether the current strategies are having the intended impact.

#### **Technical Assistance Strategies:**

- Provide customized technical assistance to WPS to support its development of a plan to identify and implement effective attendance strategies at WHS (Responsibility: NDE).
- Connect SEA with other State SIG directors with LEAs who are also working to improve high school attendance to share information about effective strategies (Responsibility: ED).

### **Issue 2: Increased Learning Time**

WHS has not fully implemented increased learning time strategies consistent with the SIG definition. It needs assistance in identifying appropriate strategies to ensure that increased learning time during summer school and after school instructional programs is used effectively to improve student achievement.

#### **Technical Assistance Strategies:**

- Provide customized technical assistance to the LEA to support its development of a plan to fully implement extended time afterschool program and during summer school at WHS (Responsibility: NDE).
- Develop a plan and timeline for the summer school and afterschool program for the 2011-2012 school year (Responsibility: WPS).

### **Issue 3: Linking Rewards to Student Achievement**

Although the NDE approved LPS's and WPS's SIG applications for Elliott and Winnebago, respectively, it was unclear how appropriate rewards are identified and linked to student achievement (See Finding on Page 10).

#### **Technical Assistance Strategies:**

- Provide focused technical assistance to the LEA to support its development of a plan to clearly identify rewards and link to student achievement (Responsibility: NDE).
- Develop a plan for how to clearly define criteria for rewards and how to link to student achievement by the beginning of the 2011-2012 school year (Responsibility: WPS, LPS).

### **Issue 4: Student Engagement Strategies**

During the classroom observations at Winnebago, the use of Smart Boards was not clearly connected to instruction to improve student achievement. Additional technical assistance is needed to assist teachers with tools/resources to engage students to improve instruction.

**Technical Assistance Strategies:**

- Provide customized technical assistance to the LEA to support its development of a professional development plan to fully use Smart Boards to change classroom instruction in order to increase student engagement and student achievement (Responsibility: NDE).
- Develop a professional development plan focus for how to integrate different types of technology to improve student achievement at the beginning of the 2011-2012 school year (Responsibility: WPS).

**MONITORING FINDINGS**

Summary of Monitoring Indicators

Critical Element	Requirement	Status	Page
<b>1. Application Process</b>	The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program. [Sections I and II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of the Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	Finding	9
<b>2. Implementation</b>	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	9
<b>3. Fiscal</b>	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	
<b>4. Technical Assistance</b>	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	
<b>5. Monitoring</b>	The SEA ensures that monitoring of LEAs and schools is being conducted consistent with the final requirements of the SIG program. [Section II of the final requirements for the School Improvement Grants authorized under section 1003(g) of Title I of Elementary and Secondary Education Act of 1965, as amended (75 FR 66363 (October 28, 2010))]	N/A	
<b>6. Data Collection</b>	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 1: The SEA ensures that its application process was carried out consistent with the final requirements of the SIG program.**

**Finding:** The NDE does not have all of the required documentation posted on its website. Although the NDE posted each LEA's/school's SIG application on its website (both recipients and non-recipients), during the review, it was revealed that two applications had budget changes where NDE deemed unallowable expenses. The final approved applications were not posted at the time of the onsite review and need to be posted online to replace the previous versions.

**Citation:** 75 C.F.R. § II.B.3 requires an SEA to post on its website, within 30 days of awarding school improvement grants to LEAs, all final LEA applications (75 C.F.R. [October 28, 2010]).

**Further action required:** The NDE must post on its website within 30 days of receipt of this report all final LEA applications, including amended budgets and/attachments.

**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 SEA has not ensured that the system of rewards for school leaders, teachers, and other staff implementing the transformation model is based in part on student achievement. The current evaluation process includes self assessments, reflection, goal setting, fact collection and professional growth; however, rewards are not clearly linked to student performance.

**Citation:** 75 C.F.R. § I.A.2. (d)(1)(i)(c) requires that an LEA must identify and reward school leaders, teachers, and other staff who in implementing this model, have increased student achievement and high school graduation rates and identify and remove those who, after ample opportunities, have been provided for them to improve their professional practice, have not done so.

**Further action required:** **Further action required:** The NDE must provide a plan to ED for how it will assist WPS and LPS to develop and implement a tool or rubric, for implementation in the 2011-2012 school year, to identify and reward school leaders, teachers, and other staff who, in implementing the transformation model, have increased student achievement.