

of 2009 which cites the bill's 2 major purposes of the bill: •Enhance oversight of improvement strategies for low performing districts and schools supported by a state review panel appointed by the Commissioner of Education•Create a fairer, clearer and more effective cycle of supports including intervention and turnaround support for chronically low performing districts and schools.

<b>(E)(2) Turning around the lowest-achieving schools</b>	<b>40</b>	<b>31</b>	<b>31</b>
(i) Identifying the persistently lowest-achieving schools	5	3	3
(ii) Turning around the persistently lowest-achieving schools	35	28	28

**(E)(2) Reviewer Comments: (Tier 1)**

(E)(2)i Identifying the Persistently Lowest Achieving Schools. The applicant will use the Colorado Growth Model to identify the persistently lowest-achieving schools. This model utilizes academic achievement of students in terms of proficiency based on the State's assessments of reading and mathematics combined with growth on those assessments over a period of three years. Colorado has been recognized as a national leader among state peers for its use of large scale assessment results via a vls the Colorado Growth Model. A number of other states have embraced the growth model and are currently implementing it in their respective jurisdictions. In prioritizing schools selected for intervention, the state will consider: 1) the number of enrolled students, 2) urban and rural school needs, 3) whether or not it is a drop out recovery school, and 4) the local capacity and commitment to implement with fidelity one of the four intervention models. The proposed fourth area cited for consideration raises a concern based on the research literature which documents the dominant conditions and environments typically associated with low achieving schools serving high poverty and high minority students, e.g. low expectations, ineffective pedagogy, minimal levels of parental involvement, inequitable distribution of financial resources along with lack of high quality and experienced teachers and school leaders. The applicant does not provide a rationale that supports using local capacity/commitment as a discriminatory factor to eliminate schools that are most likely in need of the most intervention. Consistent with the state's plan to "build human capital pipelines", an important component in prioritizing schools for intervention should include a focused evaluation of the school's capacity and commitment thereby allowing specific identified weaknesses in this area to be addressed as part of the intervention support. (E)(2)ii Turning Around the Persistently Lowest Achieving Schools. Colorado's application presents an ambitious approach to improving achievement for all of the state's students and includes a range of complex interventions and activities to address its persistently lowest achieving schools. The plan requires that commitments from LEAs be secured in the form of memorandum of understanding from superintendents and school boards to carry out one of the four interventions models required by this criterion. The state's track record in working with low performance schools has been sporadic and is documented in Exhibit VI E(2)ii-5d. Given this mixed track record and the ambitious nature of the current proposal, further attention should be given to: • Assessment of CDE's internal capacity to successfully implement the work outlined and projected needed talents and expertise • Plans for collaboration with community based agencies, non educational service providers and other out of school supports, e.g. health agencies, volunteer organizations and recreational centers.

**(E)(2) Reviewer Comments: (Tier 2)**

Colorado's presentation clarified the relationship for implementation and accountability related to the CDE's internal office responsible for turning around low performing schools and the Turnaround Center which will be created as a separate non-profit entity.

<b>Total</b>	<b>50</b>	<b>41</b>	<b>41</b>
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**F. General**

	Available	Tier 1	Tier 2	Init
<b>(F)(1) Making education funding a priority</b>	<b>10</b>	<b>4</b>	<b>4</b>	

**(F)(1) Reviewer Comments: (Tier 1)**

From 2008-2009, the level of Colorado's education expenditures increased by 5%. As a result of substantial increases in the overall state expenditures caused by the economic recession, state education expenditures as a percentage of total state expenditures decreased by 2 %--from 45-43 % during the period 2008-2009. Based on this information, the application does not meet the first section of the specified criterion. The Colorado School Finance Act (SFA) includes an equity based funding formula that adjusts base funding according to student and LEA characteristics such as high need. LEAs with more than 20% of students in poverty are considered high need. The state policy for distribution of state funds within LEAs between high poverty schools and other schools is less clear. In addition to the base per pupil funding allocation an additional amount is provided to LEAs based on an "at risk" funding formula. The SFA requires that that the LEA allocates at least 75% of its "at risk" funding to school or LEA wide instructional programs for "at risk" students or for staff development associated with teaching "at risk" students. Eligibility for participation in the federal free lunch program is used as a proxy for of each school district's "at risk" population. In 2005-2006, the state's definition of "at risk" was expanded to include students whose state assessment scores are not included in calculating a school's performance grade because the student's dominant language is not English and who are also not eligible for free lunch. Aside from these identified "at risk" funds, there does not appear to be a state policy that requires LEAS to allocate the general base funding amount to be tied to poverty. Two districts in the state are experimenting with additional resource allocation variations using weighted student funding formulas but information was not provided to indicate what specific definitions are used to determine the weights. Further information is needed to evaluate whether poverty is indeed a key factor in determining how the state defines equity for the distribution of state funds within LEAs.

**(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools**

40	40	40
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**(F)(2) Reviewer Comments: (Tier 1)**

Review of the application narrative and supporting evidence presented in Exhibits VI.F (2) i-v) indicates that Colorado has adequately addressed the following criteria related to charter and autonomous schools. The Colorado Charter School Act (Statutes C.R.S 22-30.5-109/22-30.5-504) places no limits on the number of charter schools in the state or on the number of students that these schools may enroll. Specific procedures and guidelines in both the Colorado state law and Charter School Standard Application provide detailed guidance regarding how charter authorizers approve, monitor, hold accountable, reauthorize and close schools. Additionally, clear expectations are set forth in these documents pertaining to student achievement as a key factor in determining charter school reauthorization or renewal as well as ensuring that charter school student enrollments are similar to local district populations. There are currently 153 charter school operating throughout the state. The application indicates that designated authorizers have taken action to close 9 charter schools over the period 2006-2009. Charter schools in Colorado receive 100% of LEA per pupil operating revenues in accordance to the School Finance Act (SFA) and have access to additional state and federal resources, e.g. a proportionate share of SFA set aside for at-risk-students, a share of federal and state categorical aid programs, etc. In 2008 the Colorado legislature through the enactment of the Innovation Schools Act created a new category of autonomous schools. Several documents included in the application describe the state's process for enabling LEAs to operate innovative and autonomous public schools: Options for Autonomous Schools in Colorado; A Handbook for School and District Leaders/Innovation Schools Act Fact Sheet, April 6, 2009 Commissioner's Statement on Choice Innovation. To date 3 schools have been granted Innovation School status by the Denver Board of Education. Other districts have chosen to create a process by which individual schools can apply to receive greater autonomy. Modeled after the Boston Public Schools' Pilot Schools Programs, there are three Pilot Schools currently operating in Colorado. One of the key features of Pilot Schools is the partnership between the district/local school and the teachers' union.

**(F)(3) Demonstrating other significant reform conditions**

5	3	3
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**(F)(3) Reviewer Comments: (Tier 1)**

Colorado has been in the forefront of the educational reform movement for more than 10 years. The application narrative and Exhibit VI.A(3)i-1 provides a comprehensive review of these efforts. The information provided is closely aligned to the RttT reform areas. Plan components in the state's RttT application build significantly on this track record of leadership, success and innovation in several areas: improving state education agency capacity, formation of strategic partnerships, development of content standards, and establishment of a student achievement growth model. Additional legislative enactments have focused on accountability for results, early childhood education, school choice and postsecondary readiness. The application does not clearly discriminate between the reforms that are aligned with RttT Conditions Criteria and "other conditions favorable to reform and innovation." The application provides general information on program impact, but does not address specifically this criterion's requirement for "laws, regulations, policy or other conditions.... that have increased student achievement or graduation rates, narrowed achievement gaps, or resulted in other important outcomes."

Total	55	47	47	
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**Competitive Preference Priority 2: Emphasis on STEM**

	Available	Tier 1	Tier 2	Init
<b>Competitive Preference Priority 2: Emphasis on STEM</b>	15	15	15	

**Competitive Reviewer Comments: (Tier 1)**

STEM initiatives are woven throughout the Colorado proposal in all plan criterion. The STEM emphasis includes a combination of program enhancements, expansion and new activities. There is already a strong STEM presence and network in the state. Given the significant funding stream available to promote STEM education, this existing investment combined with RttT resources would leverage the state's capacity to prepare students with the skills and competencies required by the STEM workforce. In order to maximize STEM/RttT impact greater attention is needed to more fully integrating/institutionalizing STEM throughout the RttT overall strategy and plans for each of the reform criterion areas. Colorado should also give more attention to isolating the problems associated with STEM Criteria iii, namely, underrepresented groups in STEM areas, and design specific strategies and performance measures to align with these gaps.

Total	15	15	15	
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**Absolute Priority - Comprehensive Approach to Education Reform**

	Available	Tier 1	Tier 2	Init
<b>Absolute Priority - Comprehensive Approach to Education Reform</b>		Yes	Yes	

**Absolute Reviewer Comments: (Tier 1)**

The applicant has addressed the four ARRA reform areas as well as all Success Factor Criteria required. Overall Colorado deserves high marks for its track record in having significant work already in place. In many areas Colorado has been a pioneer and provided substantial service to other states by piloting models and other approaches to reform that have been embraced. This is undoubtedly an ambitious and bold commitment. With some refinements as noted in the specific criterion sections, Colorado would be well positioned to accomplish the goals of the RttT competition.

Total		0	0	
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Grand Total

500

390

390

for persistently low achieving schools, the plan adds --Creating a Colorado Turnaround Center; --Building human capital pipelines to support turnaround efforts; and --Offering competitive funding streams to carry out dramatic changes. This plan is of a high-quality which provides achievable targets to support its LEAs in turning around these schools by implementing one of the four intervention models.

Total	50	50	50
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**F. General**

	Available	Tier 1	Tier 2	Init
<b>(F)(1) Making education funding a priority</b>	10	5	5	

**(F)(1) Reviewer Comments: (Tier 1)**

(i) From 2008 to 2009, the State's education expenditures increased 5 percent from \$8.9 billion in 2008 to \$9.4 billion in 2009. However, as a percentage of state revenues these revenues declined. (ii) The state funding formula is a sophisticated means of funding school districts and providing equity in the distribution of funds. Funds are specifically designated within the formula for high need and high poverty schools and LEAs. Such things as student poverty, size of the school district, numbers of ELL students and special education students all affect the amount of funding going to a school district. The narrative offers the following funding formula: (Funded pupil count x total per-pupil funding) + (at-risk funding) + (online funding) = Total Program Funding The information found here provide strong evidence of an equitable funding policy.

<b>(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools</b>	40	40	40
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**(F)(2) Reviewer Comments: (Tier 1)**

(i) The Charter Schools Act does not limit the number of charter schools that are authorized or limit the number of students that may attend them. They say: "In fact, the Act expressly prohibits LEAs from placing moratoria on the number of charter schools in their LEAs and provides that authorizers may not place limits on enrollment at a specific school, except that a charter school and its authorizer may agree upon limits that are necessary to achieve the school's mission and goals or to stay within the school's physical capacity. The number and types of charter schools has been included. (ii) The narrative and Appendix describe a strong state law that oversees the approval of charter schools and their monitoring, accountability, reauthorization and closing. This is a quite complete rendering of the law governing the operation of charters. Information is provided as to the number of charter school applications made in the state, number of applications approved, applications denied and reasons for the denials and the number of charter schools closed. (iii) Charters are funded in the same manner as LEAs and receive 100% of what the LEA would receive. In addition, high risk schools receive additional funds per the state aid formula. They receive a proportionate share of federal and state categorical funding. (iv) This is another strong inducement to the operation of charter school. The state does provide facility funding in the same way as LEAs. In addition, state capital funds are specifically designated to assist them in their facility needs. (v) The state has in effect a policy for the operation of innovative, autonomous public schools. The Aurora and Denver Public schools have been the principle developers of these schools. Substantial evidence for the approval and operation of these schools is provided.

<b>(F)(3) Demonstrating other significant reform conditions</b>	5	5	5
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**(F)(3) Reviewer Comments: (Tier 1)**

The state has provided ample evidence throughout the application and in this section of numerous proactive steps that address conditions favorable for the reform and innovation leading to important outcomes. They list the following reform models: CAP4K, the Education Accountability Act of 2009, the Educator Identifier Act, the Innovation Schools Act, the establishment of the School Leadership Academy, the Colorado

Growth Model. Other reform conditions have been noted in this presentation and are found in the Appendix. The proactive nature of their efforts over the years forms the impression in the reader's mind that this state is fertile ground for reform to take place.

Total	55	50	50
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**Competitive Preference Priority 2: Emphasis on STEM**

	Available	Tier 1	Tier 2	Init
<b>Competitive Preference Priority 2: Emphasis on STEM</b>	15	0	0	

**Competitive Reviewer Comments: (Tier 1)**

The STEM plan does not have the depth that is required for this priority. Although there are several measures to offer a rigorous course of study in mathematics and science, both technology and engineering are not covered with the same depth. An implementation plan similar to that used throughout the preceding narrative would be helpful to develop and organized plan for the implementation of STEM programs statewide. Goals, activities, timelines and persons responsible for implementing the STEM plan must be spelled out. The inclusion of underrepresented groups, including women and minorities is not mentioned. Generally, the plan refers to serving all students. The plan should provide information that would be both helpful in recruiting and retaining students in STEM programs. While it is not a requirement, including national programs such as Project Lead the Way would be an asset to the program since it does provide the very attributes that STEM programs seek. This section needs to describe an implementation plan that does deal effectively with underrepresented groups and needs more information on improving study in the areas of technology and engineering.

Total	15	0	0
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**Absolute Priority - Comprehensive Approach to Education Reform**

	Available	Tier 1	Tier 2	Init
<b>Absolute Priority - Comprehensive Approach to Education Reform</b>		Yes	Yes	

**Absolute Reviewer Comments: (Tier 1)**

This is an extremely well documented presentation. In keeping with the requirements for this priority, the application is comprehensive and coherently addresses the required ARRA reform measures as well as the State Success Factors Criteria. The activities presented in the application as part of the reform agenda are in many cases related to ongoing programs started well before RTTT. The application supports and extends those activities leading to a timelier implementation. LEA support, so important to fulfilling the goals of this program, involves the majority of school districts and charter schools and insures the extension of the reform agenda to all students in the state. From all the evidence that has been presented here, these ambitious but achievable goals will have provided major benefits to the students.

Total		0	0
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Grand Total	500	453	453
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<b>(F)(1) Making education funding a priority</b>	<b>10</b>	<b>5</b>	<b>5</b>
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**(F)(1) Reviewer Comments: (Tier 1)**

(i) The application provides evidence that Colorado spent more in FY09 to support elementary, secondary, and public higher education than it did in FY08, however the criterion requires that the expenditures increase as a percentage of the overall State budget decreased. (ii) The State has clear policies in place to ensure equitable funding between high-need LEAs and other LEAs which are evidenced in the narrative and appendices. If the local LEA share of required funds is insufficient to fund the LEA's Total Program, then the State makes up the difference. State law also requires that LEAs allocate at least 75% of its at-risk funding to school or LEA-wide instructional programs for at-risk students or for staff development to support these students.

<b>(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools</b>	<b>40</b>	<b>40</b>	<b>40</b>
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**(F)(2) Reviewer Comments: (Tier 1)**

Colorado's commitment to successful conditions for high-performing charter schools and other innovative schools is credibly demonstrated by its laws and a strong history of supporting non-traditional schools. The driving fact that, in Colorado's legal framework, literally 100% of the schools in the State could be charter schools with ample funding, consistent with traditional per pupil expenditures and accounting for additional funds provided for at-risk populations, is overwhelming; and, the statute allows for multiple avenues from which to be granted a charter. (i) Colorado's charter school law does not present any limitations with regard to increasing the number of high-performing charters and, in fact, expressly prohibits such limitations. (ii) The State has a prescriptive, comprehensive procedure for approving or renewing charter school applications. State law requires that student achievement be a factor in making the decision about renewing a charter. LEAs are responsible for monitoring its charter schools and ensuring that its charters are accountable for local and state performance expectations. Evidence is also provided where charter applications have been denied and also where charter schools have been closed. The law is clear and definitive with regard to meeting this criterion. (iii) The application provides evidence that State law ensures equitable funding for charter schools compared to traditional public schools as well as equitable shares of local, State and Federal revenues. While an LEA authorizer of a charter is entitled to withhold up to 5% of its per pupil allocation for administrative expenses, the LEA is required to fully justify each expenditure and to account for the amounts withheld. (iv) The State provides funding for charter school facilities through a variety of sources including the Charter School Capital Facilities Financing Act and the Public School Capital Assistance Fund. (v) The application describes the State's policies enacted in the Innovation Schools Act of 2008. Evidence is given to explain the State's enabling legislation for the establishment of innovative, autonomous public schools as well as specific examples of LEAs taking advantage of these laws to create innovative schools.

<b>(F)(3) Demonstrating other significant reform conditions</b>	<b>5</b>	<b>3</b>	<b>3</b>
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**(F)(3) Reviewer Comments: (Tier 1)**

The application essentially restates the reform conditions already addressed in prior sections except for describing the Initiative underway in the CDE to examine and evaluate how the CDE is aligned with the State's reform agenda. No other significant reform conditions are provided.

<b>Total</b>	<b>55</b>	<b>48</b>	<b>48</b>
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**Competitive Preference Priority 2: Emphasis on STEM**

	<b>Available</b>	<b>Tier 1</b>	<b>Tier 2</b>	<b>Init</b>
<b>Competitive Preference Priority 2: Emphasis on STEM</b>	<b>15</b>	<b>15</b>	<b>15</b>	

**Competitive Reviewer Comments: (Tier 1)**

Colorado provides evidence of a wide variety of STEM initiatives that in the aggregate demonstrate a strong, solid and measurable commitment to STEM priorities within its reform agenda.

Total	15	15	15
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**Absolute Priority - Comprehensive Approach to Education Reform**

	Available	Tier 1	Tier 2	Init
<b>Absolute Priority - Comprehensive Approach to Education Reform</b>		<b>Yes</b>	<b>Yes</b>	

**Absolute Reviewer Comments: (Tier 1)**

Colorado has presented a compelling set of evidence of a strong, statewide reform agenda that places priority emphasis on the areas specified in the ARRA as well as the State Success Factors Criteria. The State and its participating LEAs are clearly engaged in a systemic approach to education reform that has been thoughtfully designed in a high-quality plan. The plan is consistent in linking its strategies and funds to a focus upon increased student achievement, decreasing achievement gaps across student subgroups and increasing the rates at which students graduate from high school prepared for college and careers. The application is supported by a wide array of critical stakeholders and by a significant number of LEAs indicating a complete statewide approach.

Total		0	0
<b>Grand Total</b>	<b>500</b>	<b>402</b>	<b>409</b>



**F. General**

	Available	Tier 1	Tier 2	Init
<b>(F)(1) Making education funding a priority</b>	10	10	5	
<b>(F)(1) Reviewer Comments: (Tier 1)</b>				
Percnet of state revenues for education in 2009 was lower than those for 2008. State allocation of funds to support education take into account higher resource needs for poverty, ELL and related student indicators of educational risk.				
<b>(F)(1) Reviewer Comments: (Tier 2)</b>				
During the session, budget specific information was addressed that indicated that the proportion of the state budget dedicated to education was less in 2009 than 2008.				
<b>(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools</b>	40	40	40	
<b>(F)(2) Reviewer Comments: (Tier 1)</b>				
There are no limits placed on the numbr of charter schools in the state--153 charters presently exist. State laws exist articulating clearly the development, implementation and evaluation of charter schools and funding for charters is the same as for non-charters. There are various state and state-partnerships available to charters for facilities and related infrastructure development. The state has a policy mechanism available for LEAs to develop and implement "innovative and alternative" schools within the jurisdiction of the LEA.				
<b>(F)(3) Demonstrating other significant reform conditions</b>	5	5	5	
<b>(F)(3) Reviewer Comments: (Tier 1)</b>				
The state has taken both legislative and executive reform actions leading to policies and practices related to education reform, including a robust, accessible student data system, accountability processes, charter school development and initial efforts to link educator effectiveness to student outcomes. The platform for education reform is quite extensive and bodes well for the success of the proposed Rtt augmentation.				
<b>Total</b>	<b>55</b>	<b>55</b>	<b>50</b>	

**Competitive Preference Priority 2: Emphasis on STEM**

	Available	Tier 1	Tier 2	Init
<b>Competitive Preference Priority 2: Emphasis on STEM</b>	15	16	15	
<b>Competitive Reviewer Comments: (Tier 1)</b>				
The state makes a very clear effort to prioritize STEM efforts in all its proposed activities including addressing high standards, new assessments, and augmented professional development and augmenting sources for STEM educator preparation. By doing so in all participating LEAs, it will address opportunities for underrepresented groups in STEM opportunities.				
<b>Total</b>	<b>15</b>	<b>15</b>	<b>15</b>	

**Absolute Priority - Comprehensive Approach to Education Reform**

Available	Tier 1	Tier 2	Init
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Absolute Priority - Comprehensive Approach to Education Reform	Yes	Yes
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**Absolute Reviewer Comments: (Tier 1)**

Overall, this proposal meets all the requirements for this Absolute Priority. It addresses each required component in a comprehensive manner, has a solid history and policy platform for educational reform and presents an ambitious yet achievable plan and timetable. It engages LEAs in a substantial manner and has a clear set of achievements related to enhanced student performance that is statewide.

Total		0	0
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Grand Total	500	428	430
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that would be Title I eligible. This meets the requirements for this criterion. ii. About half of the identified schools (40) would implement one of the four RTTT intervention strategies; the other group (47) would get "turnaround support" incentive grants. The second group is described as adopting a turnaround model after the grant period is over. Partial credit is awarded for this criterion.

Total	50	45	45
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**F. General**

	Available	Tier 1	Tier 2	Init
<b>(F)(1) Making education funding a priority</b>	10	6	6	

**(F)(1) Reviewer Comments: (Tier 1)**

i. State expenditures for education decreased from FY2008-2009, from 45% to 43% of total state expenditures. ii. CO appears to have a relatively equitable school funding system compared to other states, as determined by external rating agencies.

<b>(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools</b>	40	40	40
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**(F)(2) Reviewer Comments: (Tier 1)**

i. The proposal provides evidence that the state has NO CAPS on charter school establishment or enrollment. Currently, 153 charter schools operate in CO. ii. The proposal provides evidence that the state has laws and rules regarding how charters get approved and how they are held accountable (by the LEA); to be reauthorized, charters must present performance information. Contracts can be revoked for violations of the contract or state law, failure to make reasonable progress towards student performance goals, or for fiscal mismanagement. iii. Charter schools in CO receive 100% of LEA per-pupil funding. This fully meets requirements for this criterion. iv. CO makes a state appropriation available for charter school facilities. The state also created a charter school debt reserve fund to provide additional security for capital financing. This fully meets requirements for this criterion. v. CO allows waivers for school innovation, and the proposal addresses the development of autonomous public schools as requested in the application.

<b>(F)(3) Demonstrating other significant reform conditions</b>	5	3	3
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**(F)(3) Reviewer Comments: (Tier 1)**

Other significant reforms are listed in the application and woven throughout. These include a P-20 alignment strategy, the Educator Identifier Act, the Innovation Schools Act, and the Colorado Growth Model. The listed state reforms support the RTTT reforms. However, no evidence was provided for outcomes of these reforms.

Total	55	49	49
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**Competitive Preference Priority 2: Emphasis on STEM**

	Available	Tier 1	Tier 2	Init
<b>Competitive Preference Priority 2: Emphasis on STEM</b>	15	0	0	

**Competitive Reviewer Comments: (Tier 1)**

The proposed plan does not meet the three requirements of the STEM priority. It focuses mainly on making more resources available to teachers (requirement ii), but does not mention developing rigorous courses of study for students or the recruitment and preparation more students for advanced study and careers in

STEM fields. The CO STEM Network and STEM in Action Initiative, as described, do not fully meet the three requirements of the competitive preference priority.

Total	15	0	0
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**Absolute Priority - Comprehensive Approach to Education Reform**

	Available	Tier 1	Tier 2	Init
<b>Absolute Priority - Comprehensive Approach to Education Reform</b>		Yes	Yes	

**Absolute Reviewer Comments: (Tier 1)**

The plan, with reservations as described below, does represent a comprehensive approach to education reform as required for the Absolute Priority. For each of the RTTT reforms, weaknesses appear in the proposal: 1) In 52 of the participating districts, union leaders did not sign the MOU, raising questions about commitment to teacher reforms including evaluation based on student growth measures. 2) The proposal does not address how student growth will be measured in grades and subjects not tested by the state. Addressing these additional growth measures is essential to ensuring that all educators will be included in the reform's evaluation system. 3) The project management plan relies heavily on consultants and unnamed "change agents," raising questions about the state's capacity to implement the RTTT reforms and sustain them beyond the grant period. 4) The plan is heavily reliant on the SEA for direct services to participating districts, without the use of regional or other local supports, which raises capacity questions in addition to those mentioned in point #3 above. 5) The plan also relies heavily on the good will of participating districts to self-direct their reform efforts, without making clear the processes they will engage in to do so. 6) A clearly-described system to measure progress and document the effectiveness of reform efforts is lacking.

Total		0	0
<b>Grand Total</b>	<b>500</b>	<b>341</b>	<b>336</b>