

E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1	Tier 2	Init
(E)(1) Intervening in the lowest-achieving schools and LEAs	10	10	10	

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

Applicant has the legal authority to register low-performing LEAs and schools and enter them into its School Under Registration Review (SURR) Program which provides a series of intervention options that focus on improving student achievement. Applicant acknowledges that the present SURR program intervention strategies have not resulted in significant increases in student achievement and recognizes the need to strengthen LEA/school connections. Applicant welcomes the restructuring of its current program based upon lessons learned and embraces the opportunity RTT provides to strengthen efforts to intervene in low-performing schools.

(E)(2) Turning around the lowest-achieving schools	40	34	34	
(i) Identifying the persistently lowest-achieving schools	5	4	4	
(ii) Turning around the persistently lowest-achieving schools	35	30	30	

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

Applicant has an effective mechanism for identification of low-performing schools. The new plan, which will support four school intervention models, will include an expanded comprehensive system of support to LEAs which will include External Technical Assistance Center. Applicant will reorganize support structures and systems such as creating an Office of Innovative Schools Models that will expand efforts for innovative partners in the marketplace in an effort to expand student program options. Examples of options include: recognized successful charter school programs, Mass Insight Partnership Zone and the development of Virtual and Blended Schools.

Total	50	44	44	
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F. General

	Available	Tier 1	Tier 2	Init
(F)(1) Making education funding a priority	10	10	10	

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

Applicant has adopted a new approach to funding education in 2008 which creates an equity funding formula which reallocates State Foundation Aid funds to support 204 districts that have schools that serve the highest concentrations of students in need. Applicant's funding for public education from FY 2008 to FY 2009 increased a significant 2.3%.

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	36	32	
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(F)(2) Reviewer Comments: (Tier 1)

Applicant has 140+ charter schools among its 4540 public schools. The Applicant is considered, by definition, to have a medium cap on the number of charter schools. Applicant has established a positive charter school environment. Applicant has been recognized in recent report by the National Alliance for Public Charter Schools as second in the nation for its quality control policies. Applicant's charter schools receive equitable funding as compared to traditional schools and charter schools have numerous options for

funding support in acquisition of facilities. Applicant has the authority to enable LEAs to operate innovative, autonomous public schools other than charter schools. Tech Valley Regional Technology Institute a leading example of this approach.

(F)(2) Reviewer Comments: (Tier 2)

During the interview, while there was an interest in increasing the present cap, it was clarified that there is a current charter school cap of 200 which by definition puts the applicant in low cap category.

(F)(3) Demonstrating other significant reform conditions	5	4	4
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(F)(3) Reviewer Comments: (Tier 1)

Applicant has a nationally recognized interconnected network of educational services which provides universal access to libraries, museums, archives and other cultural institutions.

Total	55	50	46
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Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1	Tier 2	Init
Competitive Preference Priority 2: Emphasis on STEM	15	15	15	

Competitive Reviewer Comments: (Tier 1)

Applicant has outlined a commitment for a broad engagement strategy to support STEM that is embedded into the four assurance sections. An impressive group of stakeholders across the state has been involved and are committed to Applicant's STEM initiative. While the Applicant as a whole has met the Competitive Priority, the Applicant could expand upon strategies to address under-represented groups such as minorities and women for greater inclusion in STEM programs.

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

	Available	Tier 1	Tier 2	Init
Absolute Priority - Comprehensive Approach to Education Reform		Yes	Yes	

Absolute Reviewer Comments: (Tier 1)

Applicant clearly and strategically embraces all RTT components and comprehensively addresses all four educational reform areas. Noteworthy, is the fact that applicant's current Reform Plan is complementary to RTT reform agenda.

Total		0	0	
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Grand Total	500	436	434	
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(E)(2) Turning around the lowest-achieving schools	40	32	32
(i) Identifying the persistently lowest-achieving schools	5	3	3
(ii) Turning around the persistently lowest-achieving schools	35	29	29

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

NY has a thorough methodology for identifying persistently low-achieving schools. NY has a comprehensive and multi-layered approach to supporting LEAs in working with turnaround schools. Beyond a cogent method for identifying these schools they have an approach that involves multiple layers of support from state and external entities. It does not only focus on episodic help for schools in the turnaround process but rather it tries to couple that assistance with capacity-building in the LEAs. Two State offices combine with a State office run by an external partner (ETACIT) and Joint Intervention Teams to provide the support schools and LEAs need to succeed. These multiple perspectives ensure that LEAs and schools are getting a variety of expertise that will help them choose the appropriate turnaround model and implement it effectively. NYSED uses these offices and array of other resources to assist schools as they choose one of the four models. The State requires that implementation plans and program descriptions are submitted for review and then evaluates those plans for quality. During the implementation, the schools receive technical support and ongoing information reporting along with annual effectiveness evaluations. The State is committed to supporting its LEAs whether they have staff dedicated to supporting turnaround schools and preexisting relationships with external partners or whether they need the State to broker relationships with such partners for them. NYSED's approach allows LEAs to handle turnaround on their own, broker their own partnerships or turn to a pool of partners developed by the state through an RFP process for help. The approach borrows from the zone/cluster concept and best practices of education management organizations that share information. In an effort to support continued innovation that produces new successful turnaround models, NY is also launching a secondary schools innovation incentive fund as well. In addition, NY is exploring the role of online and virtual schooling in turnaround schools serving at-risk youth. Overall, NY's plan is multi-faceted, comprehensive, rooted in research and best practice, and realistic. The identification of only 57 persistently low-achieving schools - out of approximately 4000 - raises a credibility issue. Addressing only 57 schools in this pool of 4000 might be realistic but may not be ambitious.

Total	50	42	42
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F. General

	Available	Tier 1	Tier 2	Init
(F)(1) Making education funding a priority	10	7	7	

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

Education expenditure increased from 2008 – 2009. NY's Foundation Formula is a multi-step calculation designed to ensure equity among LEAs that takes into account need, the LEA ability to contribute to cost, and overall student achievement levels. The aim is for the State to distribute aid on the basis of which districts have the biggest differential between cost and ability to cover as well as overall student need. In addition NY requires LEAs that receive significant State funds to sign a contract that, in part, requires those districts to allocate State funds in a way that prioritizes those schools in the greatest need. The question remains what policy was or is in place to address equity in NY right now and what are the results? In addition, why does the economic crisis in the State result in a delay for the phase-in of the foundation funding formula?

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	29	24	
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(F)(2) Reviewer Comments: (Tier 1)

NY laws caps the number of start-up charters at 200. There is no cap on conversions, no cap on enrollment and no de facto cap created through funding. NY has a nationally recognized level of rigor for authorizing and re-authorizing charters that requires the setting and reaching of student achievement targets and they closed 10% of the number of total schools opened since 04-05 in that same period. NY law encourages the creation of charters with populations that reflect the local community and prioritize SWDs and ELLs as well as a de facto charge to prioritize at-risk students (75% of all students attending in 2008). Per pupil funding in charter schools is 100% of what regular public school pupil funding is for instructional costs (excluding capital expenses, cafeteria etc.) but lagged two years. NY does not provide any dedicated funding to charters for facilities. NY does have a Charter Schools Stimulus Fund, makes provisions for charters to share school space with regular schools, and NYCDOE actively assists charters with obtaining space. Charter can participate in Federal school bond programs. NY's approach to charters is mixed. They are rigorous in awarding charters and will close those that don't measure up. They cap start-ups but not conversions. They give "full" funding but the definition of full is qualified. They do not provide facilities directly but there are multiple mechanisms to support them in this area. There are examples of innovation and autonomy in the State outside of the charter schools that is allowed if not facilitated by the State and or LEAs - though the extent to which this is true is not clear. (E.g. staffing autonomy can only occur in union free districts.)

(F)(2) Reviewer Comments: (Tier 2)

NY has a hard cap on start-up charter schools. When asked to comment on the cap, the NY team's response was not convincing enough to allay fears that, as a state, NY lacks the collective will to make critical changes to existing laws that act as impediments to substantive reform. A limit of 200 start-up charters in a state with over 4500 schools, coupled with the lack of a convincing rationale for such a cap, is significant and cause for a further deduction in this area.

(F)(3) Demonstrating other significant reform conditions

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

NY's integrated PK-16 governance structure provides a favorable condition for reform. The Regents leverage their authority over NY's cultural institutions to provide valuable partnerships among schools and museums and universities. The examples provided indicate some evidence for favorable conditions but not overwhelming.

Total

55

39

34

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1	Tier 2	Init
Competitive Preference Priority 2: Emphasis on STEM	15	15	15	

Competitive Reviewer Comments: (Tier 1)

NY successfully addresses STEM education throughout its application and the four assurance areas. When listed out, the proposed plans and strategies touching on STEM education in each of the areas, a plan emerges that offers a rigorous STEM course of study, cooperation with external partners to enrich STEM education and the capacity of STEM educators, and opportunities for more students to get a high quality education in a STEM area. This plan also has strategies for making the pool of students taking a STEM course of study more diverse. It should be noted that the application does not address the needs of underrepresented groups and of women and girls. While NY still gets the STEM priority, it must be noted that this point was ignored.

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

	Available	Tier 1	Tier 2	Init
Absolute Priority - Comprehensive Approach to Education Reform		Yes	Yes	

Absolute Reviewer Comments: (Tier 1)

The State's application comprehensively and coherently addresses all of the four education reform areas specified in the ARRA. It also meets the State Success Factors Criteria. The State has sufficient LEA participation and commitment to successfully implement and achieve the goals in its plans. The application adequately describes how the State, in collaboration with its participating LEAs, will use Race to the Top and other funds to increase student achievement, decrease the achievement gaps across student subgroups, and increase the rates at which students graduate from high school prepared for college and careers. NY's application builds on the significant innovation already underway in the state and it proposes ways to scale-up successful practices. Their contention that addressing these weaknesses and building on their strengths as they address the four assurance areas will lead to continued increases in student achievement and narrowing of the achievement gap is convincing.

Total		0	0
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Grand Total	500	398	383
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E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1	Tier 2	Init
(E)(1) Intervening in the lowest-achieving schools and LEAs	10	10	10	

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

E 1 New York law 210, 211-b and 211-c and Commissioner's regulations 100.2 highlight the State's legal authority to intervene directly in the State's persistently lowest-achieving schools and LEAs.

(E)(2) Turning around the lowest-achieving schools	40	38	40	
(i) Identifying the persistently lowest-achieving schools	5	5	5	
(ii) Turning around the persistently lowest-achieving schools	35	33	35	

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

E 2 i New York has been identifying persistently lowest-achieving schools since 1989. Since that time 312 schools have been identified. It has benefited from those experiences and knows where improvements are needed in these procedures. Its plan is a strong one that will strengthen and broaden its efforts in this regard. E 2 ii New York's plan is very thorough and benefits from the State's past efforts in this area, enabling it to know where pitfalls are and to understand just what all it will take to successfully turn schools around. It has learned that LEAs have to have the capacity to do the job and especially they have to have the support to build that capacity. Accordingly, New York is reorganizing offices and assigning them with specific tasks necessary to the endeavor. The plan identifies the full array of technical services that will be made available to LEAs and it's difficult to imagine what could possibly be missing from what they might need. The plan has an accountability component that includes an annual evaluation of the intervention efforts of participating LEAs with low-performing schools. Even with all this commitment and planned support, the proposal estimates the State will be engaged in turning around 0 schools in just a very few years, but offers lacks explanation of how they arrive at that ambitious estimate.

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

There was a typo in this reviewer's Tier 1 comments. New York will be engaging with 57 schools. After the Tier 2 discussion, it is clear that that number complies with the USDOE's guidelines to be followed in this regard.

Total	50	48	50	
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F. General

	Available	Tier 1	Tier 2	Init
(F)(1) Making education funding a priority	10	10	10	

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

F 1 i New York did increase the percentage of its state funding from FY 2008 to FY 2009. F 1 ii In 2007-2008, New York adopted a new approach to funding education referred to as Foundation Aid and the State's policies do lead to equitable funding. New York's new funding model is based on the Augenblick model of determining an appropriate per-pupil amount and then distributing more funds to districts identified as high-need. New York has developed a Need Resource Capacity to measure districts' relative need. It is based on free and reduced-price lunch data and census poverty data in relation to the resource capacity

existing in a district – the district's ability to raise revenues locally. The result is an equalization of funding, e.g., less wealthy districts enrolling 54.5% of students, but receiving 66.6% of aid.

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

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

F 2 i While New York maintains that its cap on charters does not inhibit the growth in them these facts remain: One, there is a cap. Two, the cap results in a low percentage of New York's 4,540 schools being charters, even given the State's references to its hospitable approach to these schools. Three, while it is pointed out that there is no cap on the number of charters that public schools can grant, the narrative states that these charters may be, not must be granted if a majority of parents vote to convert the school into a charter. It's not difficult to imagine the overwhelming task it would be to a) get a majority of parents to agree and b) get permission from local school boards who, for obvious reasons, are going to be reluctant to grant any charters but especially a conversion charter as they would be firing themselves. That there are only 6 of these in a state the size of New York attests to the difficulty of exercising this provision of the law. F 2 ii The State prides itself on its clear and stringent guidelines and laws regarding the authorization and monitoring of Charter Schools. It cites two national reports recognizing New York for its quality control of these schools and the criterion does stipulate that this review be in regard to "high-performing" charter schools. However, considering the low percentage of charter schools allowed in the state as noted above, the modest number of applications in the last five years and the percent of them that were denied: two-thirds in 2004-05; one-third in 2005-06; no applications in 2006-07; a little under half in 2007-2008 and 40% in 2008-2009. In addition, the seemingly strong pressure applied to applicants to enroll a healthy percentage of subgroups to receive authorization (meaning greater than, not similar to, their percentages in the local district student population), there is concern that the rigor that is being applied to the authorization and monitoring of charter schools, while helping to ensure their success, might be causing the State's approach to serve as a deterrent to a reasonable number of charters and the growth and types of them. F 2 iii While the formula for Charter Schools differs from that of regular public schools somewhat, it provides that Charters receive similar funding amounts. F 2 iv The State provides several kinds of facilities assistance for Charter Schools but does not provide funds to purchase or lease facilities. F 2 v The State enables LEAs to operate innovative autonomous public schools. However, in a large state like New York, only two examples were given.

(F)(3) Demonstrating other significant reform conditions

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

F 3 New York has demonstrated other conditions favorable to education reform or innovation. Of interest is that New York has been operating early college high schools since 1974.

Total

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38

38

Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1	Tier 2	Init
Competitive Preference Priority 2: Emphasis on STEM	15	15	15	

Competitive Reviewer Comments: (Tier 1)

New York has demonstrated throughout its proposal that will address all aspects of the STEM priority. Throughout its proposal, New York embedded its strong commitment to the development of STEM. It incorporates strategies and recommendations from several regional and national initiatives such as The Empire State STEM Education Progressive Dialogue led by Rensselaer Polytechnic Institute that included the input of over 500 stakeholders including over 40 businesses and has aligned them with the four

assurance sections. For Enhanced Standards and Assessments, it will: implement the new Common Core math standards, revise its science standards and assessments, once established by the consortium; establish new standards and assessments in technology and provide aligned curriculum frameworks for STEM.

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

	Available	Tier 1	Tier 2	Init
Absolute Priority - Comprehensive Approach to Education Reform		Yes	Yes	

Absolute Reviewer Comments: (Tier 1)

New York State has developed an aggressive plan that covers all the reform areas. It has set targets for strengthening the State's overall education infrastructure that will include making specific improvements in state learning standards. These improvements will, in turn, drive better instruction and increased student achievement. To reduce the achievement gap, New York will increase early childhood opportunities, put a stronger focus on outcomes for students with disabilities and English Language Learners and deliver more equitable distribution of teaching talent. It will also reduce barriers to teaching and learning in high needs schools by establishing education, health and mental health collaborations. Of course, all of these steps will also lead to increased graduation rates. It also plans customized pathways to high school completion. The State will greatly expand its use of technology to improve data collection that will inform the entire spectrum of planned reforms. In addition, New York will create several new statewide virtual schools and online courses to enable students to earn more credits and access courses that will encourage college attendance. The above listing does not do justice to all that is planned but helps to demonstrate New York's commitment to comprehensive reform.

Total		0	0
Grand Total	500	450	454

Total	50	32	32
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F. General

	Available	Tier 1	Tier 2	Init
(F)(1) Making education funding a priority	10	5	5	

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

(i) The percentage of the total revenues available to the State that were used to support elementary, secondary, and public higher education for FY 2009 was slightly greater than the percentage of the total revenues available to the State that were used to support elementary, secondary, and public higher education for FY 2008. (4/5)(ii) The State's foundation formula is designed to lead to equitable funding across LEAs. Applicant does not provide data to demonstrate that there is in fact equitable funding across and within districts. (1/5)

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	26	24	
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(F)(2) Reviewer Comments: (Tier 1)

(i) Applicant states that state law has a cap of 200 on start-up charter schools but attempts to argue that this does not prohibit or effectively limit the number of high-performing charter schools in the state because technically there is no cap on conversion charter schools. This reasoning is not convincing. There are currently 140 charter schools and 4540 traditional public schools, which is not a large percentage. (4/8)(ii) The applicant reports having a rigorous approval, monitoring, and reauthorization process. Applicant reports that 8 charter schools have been closed for poor academics. As a percentage of the total number in operation now this is a relatively large percentage, when compared to the percentage of closures in the traditional sector over the same 5 year period. The ratio (81/153) of schools approved suggests that the approval process is relatively difficult. (8/8) (iii) Applicant reports that the state's procedure for funding charter schools results in their receiving equitable funding compared to traditional public schools. State provides additional funding in addition to per pupil tuition allowances. Unfortunately, applicant fails to provide evidence to prove this point through a per pupil ratio of charter to traditional public school funding per pupil. (5/8) (iv) Despite the fact that there is not funding dedicated solely to facilities costs, applicant reports that there are several funding streams to help support charter schools with their facilities funding needs. In addition, applicant notes that there are some ways in which the restrictions on charters regarding facilities may actually be less stringent than those on traditional public schools. (5/8) (v) Technically, the state generally enables LEAs to operate innovative, autonomous public schools other than charter schools; applicant states: The board of education of each school district has authority to prescribe the course of study, employ teachers and other staff, exercise budgetary control and otherwise exercise the superintendence, management and control of the school district. It does not appear that state meets these criteria to the full extent. (4/8)

(F)(2) Reviewer Comments: (Tier 2)

The cap on the charter law does have the effect to be severely inhibiting on new charter schools.

(F)(3) Demonstrating other significant reform conditions	5	3	3	
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(F)(3) Reviewer Comments: (Tier 1)

Applicant has not demonstrated to a large extent that, in addition to information provided under other State Reform Conditions Criteria, it has created, through law, regulation, or policy, other conditions favorable to education reform or innovation that have increased student achievement or graduation rates, narrowed achievement gaps, or resulted in other important outcomes. Although having access to resource materials through museums and libraries is valuable, it is not clear the extent to which this access has led to increases in graduation rates and student achievement. The applicant does, however, describe a strong

program of cooperation between LEAs and IHEs. Applicant describes how tens of thousands of students have taken advantage of various drop-out prevention services, for example.

Total	55	34	32
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Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1	Tier 2	Init
Competitive Preference Priority 2: Emphasis on STEM	15	0	0	

Competitive Reviewer Comments: (Tier 1)

Applicant does have a plan to address many of the priorities listed in the criteria for this competitive preference category. However, the plan does not address all aspects. In particular, applicant has not provided sufficient evidence that its plan will result in the preparation of more students for advanced study and careers in the sciences, technology, engineering, and mathematics, including by addressing the needs of underrepresented groups and of women and girls in the areas of science, technology, engineering, and mathematics.

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

	Available	Tier 1	Tier 2	Init
Absolute Priority - Comprehensive Approach to Education Reform		Yes	Yes	

Absolute Reviewer Comments: (Tier 1)

To a sufficient extent to meet this absolute priority, the State's application comprehensively and coherently addresses all of the four education reform areas specified in the ARRA as well as the State Success Factors Criteria in order to demonstrate that the state and its participating LEAs are taking a systemic approach to education reform. In addition, the state has demonstrated in its application sufficient LEA participation and commitment to successfully implement and achieve the goals in its plans. The applicant sufficiently describes how the state, in collaboration with its participating LEAs, will use Race to the Top and other funds to increase student achievement, decrease the achievement gaps across student subgroups, and increase the rates at which students graduate from high school prepared for college and careers. Not all of the components of the plan are equally strong, however. The application itself is relatively well written. The action steps and timelines are clear for most initiatives, and the personnel charged with implementation appear relatively well qualified. The state's plan for intervening in persistently low-performing schools and for expanding the role of charter schools is not as aggressive as it might be, however.

Total		0	0	
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Grand Total	500	356	350	
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yet its plan to use a compliance type report to determine which projects are producing results and merit more money overextends the role and value of such reports. Also, the plan describes a program's evaluation components; it does not describe "how" the programs will be evaluated. For example, the plan does not detail how the "transfer the knowledge and skills to classroom practice" will be evaluated.

Total	138	101	101
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E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1	Tier 2	Init
(E)(1) Intervening in the lowest-achieving schools and LEAs	10	10	10	

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

The State has the legal authority to intervene direction in the State's persistently lowest-achieving schools and LEAs in improvement or corrective action.

(E)(2) Turning around the lowest-achieving schools	40	36	39	
(i) Identifying the persistently lowest-achieving schools	5	2	5	
(ii) Turning around the persistently lowest-achieving schools	35	34	34	

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

The State has a system in place for identifying its lowest-performing school; however, the State's formula only identifies 57 schools or a little more than 1% of all schools. The dearth of schools identified comprises the validity of the State's formula. The State has a high-quality plan to support its LEAs in turning around these schools by implementing one of the four school intervention models proposed by the Department of Education. The State's strategy, providing additional supports to poor performing districts and schools through a support zone, may have the positive consequence of ensuring best practices are shared and educators have a community of supports. The State's reliance on RFPs as a strategy does not in and of itself constitute a plan; however, the process of identifying and using intermediary partners should allow failing entities to identify supports that align with needs of their schools, and, in the process, to immediately begin working to deliver the right intervention model. The State's virtual schools initiative has the potential to develop into an innovative, scalable, and field-tested model for delivering education.

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

The State's formula for identifying its lowest-achieving schools is consistent with the Department of Education's formula for identifying low-achieving schools. Upon further review, the State's has sufficiently identified its persistently lowest-performing schools.

Total	50	46	49
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F. General

	Available	Tier 1	Tier 2	Init
(F)(1) Making education funding a priority	10	6	6	

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

The State's percentage of the total revenues used to support elementary, secondary, and public higher education in FY 2009 was slightly less than the total revenues available to the State FY 2008. The State's

Foundation Aid formula and C4E initiative policies are key actions that may lead to equitable funding (a) between high-need LEAs and other LEAs, and (b) within LEAs, between high-poverty schools and other schools in the State. The challenge, however, is education funding has decreased and the phase-in of the Foundation Aid formula has been delayed due of the economic crisis. These two actions undercut the State's narrative on education being a priority.

(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	34	34
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(F)(2) Reviewer Comments: (Tier 1)

The State has a charter school law that effectively inhibits increasing the number of high-performing charter schools in the State. The current charter cap is 200, and there are 134 non-conversion charter schools currently operating. Given the size of the state and annually descending charter slots, the charter school limit is inhibiting. The State's plan reasonably explains how schools and LEAs receive equitable funding and facilities funding. The State has been nationally recognized for its charter quality control policies, including "its provision for performance-based charter contracts; comprehensive charter school monitoring and data collection processes; and clear processes for renewal, no-renewal, and revocation decisions." The State's law allowing LEAs to operate public schools other than charter schools is limited to LEAs where unions are not present.

(F)(3) Demonstrating other significant reform conditions	5	5	5
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(F)(3) Reviewer Comments: (Tier 1)

The State demonstrates other significant reform conditions that are favorable to education reform.

Total	55	45	45
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Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1	Tier 2	Init
Competitive Preference Priority 2: Emphasis on STEM	15	0	0	

Competitive Reviewer Comments: (Tier 1)

The State successfully integrates STEM strategies throughout its proposal. The State's application addresses the need to (i) offer a rigorous course of study in mathematics, the sciences, technology, and engineering by 1) implementing the new Common Core math standards, 2) establishing new standards and assessments in technology, 3) providing aligned curriculum frameworks for STEM; (ii) cooperate with STEM-capable community partners to prepare and assist teachers in integrating STEM content by 1) providing financial incentives for STEM teachers in high schools. The State does not articulate how its plan will (iii) prepare more students for advanced study and careers in the sciences, technology, engineering, and mathematics, including by addressing the needs of underrepresented groups and of women and girls in the areas of science, technology, engineering, and mathematics.

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

	Available	Tier 1	Tier 2	Init
Absolute Priority - Comprehensive Approach to Education Reform		Yes	Yes	

Absolute Reviewer Comments: (Tier 1)

The State's application comprehensively and coherently address all of the four education reform areas specified in the ARRA as well as the State Success Factors Criteria and its participating LEAs are taking a systemic approach to education reform.

Total		0	0
Grand Total	500	386	392