Applicant outlines a plan for improving teacher and principal effectiveness based on the establishment of a statewide performance-based evaluation system. Integral to this plan is the development of a clear definition of effectiveness that will include student growth measures. The RTT Commission will develop Teacher Effectiveness Measures (TEM) and Leader Effectiveness Measures (LEM) for principals. The evaluation instruments will be based on Evidence-Based Performance Rubrics. Most importantly, for the first time, every school system will be required to use the same annual state developed evaluation instrument. The second part of this sequenced plan is to provide incentive compensation to professionals that positively impact student growth. Development of guidelines to provide such a plan will begin with providing support for pilot programs with LEAs, like Tulsa who has already committed to piloting a performance-based incentive compensation system as a result of their work with the Gates Foundation Grant. Applicant states that once the TEM and LEM are fully in place the new effectiveness measures will be used to align all aspects of teacher and leadership programs. Applicant's ambitious target of 100% implementation of performance-based evaluation system at the end of the 2011-2012 school year needs further clarification.

(D)(3) Ensuring equitable distribution of effective teachers and principals	25	18
(i) Ensuring equitable distribution in high-poverty or high-minority schools	15	10
(ii) Ensuring equitable distribution in hard-to-staff subjects and specialty areas	10	8

### (D)(3) Reviewer Comments:

Applicant uses its efforts with alternative pathways as a strategy to ensure equitable distribution of effective teachers and principals. For example, during the last school year, 1567 teachers were licensed through traditional routes as compared to 1200 teacher licensed through alternative pathway routes. Applicant has involved several institutes of higher learning that are devoloping programs to address teacher supply issue for urban areas and hard-to-staff subjects. Applicant outlines five goals with specific action steps to address equitable distribution. Presently, what is missing, but will be corrected through the implementation of the five goals and the implementation of a performance-based evaluation system, is any method to measure the quality of the teachers in high-poverty and high-minority schools.

(D)(4) Improving the effectiveness of teacher and principal preparation programs	14	11

### (D)(4) Reviewer Comments:

Applicant outlines three goals and actions that, if implemented, will result in significant improvement of these programs. The cornerstone of these goals, which will have outcome measures that will become part of the state's upgraded longitudinal data system, will be the performance-based teacher and principal evaluation programs that will include measures for student achievement and growth data. Goal 3 specifically states that the National Center for Teacher Quality will collect and analyze data of student outcomes by teachers and teacher preparation programs. Information obtained from this research will guide efforts to improve programs.

(D)(5) Providing effective support to teachers and principals 20 17	oviding effective support to teachers and principals	17
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### (D)(5) Reviewer Comments:

Applicant outlines six comprehensive goals and activities that will provide effective support to teachers and principals. These goals describe a research-based best practice plan that more closely links the state with the LEAs for identified program support for teacher and principal effectiveness. A specific example would be providing training for teachers and principals on how to use effectively identified instructional improvement systems to design instructional strategies that improve student achievement. More examples would provide greater clarity.

Total	138	110
		i

# E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	10	10
(E)(1) Reviewer Comments:		

Applicant has the legal authority to intervene directly in the state's persistently lowest-achieving LEAs and schools. Under provisions of a recent 2009 law, LEAs have four alternative program choices which these identified schools may be required to enter.

(E)(2) Turning around the lowest-achieving schools	40	28
(i) Identifying the persistently lowest-achieving schools	5	· 3
(ii) Turning around the persistently lowest-achieving schools	35	25

### (E)(2) Reviewer Comments:

Applicant recognizes the need to make a dramatic shift in expectations and practice to be more successful in making a difference with its lowest-achieving schools. The identification of only five schools is not going to create a dramatic turn around. The Applicant's Plan is based upon four principles that address: personnel, time, community and resources. These principles are supported by four goals with supporting activities that comprehensively set a new standard of expectations and more direct support for persistently-lowest achieving schools. Applicant appropriately notes the reality of the challenge presented in its two urban school districts and that there is a great need for capacity building with staff before improvement efforts can be realized. However, the limited number of schools identified (5) is not consistent with a dramatic shift in expectations.

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Total					50	38	
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### F. General

	Available	Tier 1
(F)(1) Making education funding a priority	10	9
(F)(1) Reviewer Comments:  Applicant's FY 2009 funding support for public education was slightly greater, .14 2008. Applicant has a State Aide funding formula that is designed to promote ver equity.		
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	20
(F)(2) Reviewer Comments:  Applicant's Charter School Act does not cap the number of high-performing chart percentage of total schools in the state that are allowed to be charter schools. He geographical limitations that restrict charters to more urban, high-need areas and charter efforts in the medium category. Applicant does not provide details on the school applications made, denied and closed. The charter school goverance arrafive turnaround options for low-achieving schools. Charter schools receive company Applicant presently has 18 charter schools and plans are underway to expand charter and Oklahoma City. Applicant does support efforts to operate innovative only example of a contract school model is used in Tulsa with KIPP.	owever, there  by definition number of changement is charable state from the character school	are put narter one of the unding. options
(F)(3) Demonstrating other significant reform conditions	5	3
(F)(3) Reviewer Comments:		

# E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	10	5
(E)(1) Reviewer Comments:		
The state recently passed legislation that allows its state board of education to i		

The state recently passed legislation that allows its state board of education to intervene in schools but there is no clear evidence in the application that it can intervene in LEAs in need of alternative governance due to poor performance for four consecutive years.

(E)(2) Turning around the lowest-achieving schools	40	11
(i) Identifying the persistently lowest-achieving schools	5	2
(ii) Turning around the persistently lowest-achieving schools	35	9

#### (E)(2) Reviewer Comments:

The application does provide a list of lowest-achieving schools from 2004-05 to 2008-09 with a column identifying the percent of highly qualified teachers working in each of the schools. Only three of the 42 schools on the list have 95% or higher rate of highly qualified teachers. The application does not provide any definition or measure to inform the reviewer about how the state arrived at the highly qualified teacher status or the basis for the data in this column. On the contrary, the evidence in this application suggests that the state does not have a method for systemically identifying its highly qualified teachers. The plan describes 4 school improvement goals and associated activities it proposes to implement to address the needs of turnaround schools. The goals are well articulated and aligned well with proven school improvement strategies. The activities described under the goals for intervening in low achieving schools reference various programs that currently exist in the state; however, there is little information provided about how many schools are using the various programs and no data to assess the effectiveness of these programs nor is there evidence of the interventions raising student achievement in Oklahoma schools. The connection between the planned goals and activities and the four intervention models is unclear. The staffing for these activities is to be determined which shows a lack of adequate planning given the 2010 start up date for many of the activities. The plan cites pending legislation that will define further opportunities for flexibility to execute innovative initiatives for turnaround schools. As a result, the extent of the board of education's ability to conduct actions is not clear. There is a chart providing historic evidence about the state's school turnaround efforts and lessons learned from 12 schools since 2004-2005. The results of the 12 interventions are not provided, which makes it difficult to determine the state's success and capacity to effectively intervene in low achieving schools.

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Total	50	16
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#### F. General

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

### (F)(1) Reviewer Comments:

The funding for education in the state increased slightly between FY2008 and FY 2009. There is a new law cited in the application that provides a college tuition assistance program for qualifying students. The Board of Equalization does not get these funds from appropriations however and it is unclear whether or not the additional increase in high education funding is from a non-appropriated funding source.

	(F)(2) Ensuring successful conditions for high-performing charter schools and	40	10
	other innovative schools		
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### (F)(2) Reviewer Comments:

The state has a law that does not cap the number of charter school in the state but there appear to be geographical county caps. In addition there is a cap of three annual new charter schools. The application cites a mandatory 10 hour training conducted by the state board of education for new charter school teams for accountability. There is little evidence in the way of additional monitoring of charter schools' impacts on student achievement. The application lacks details about the process for determining initial and renewal of charters. There are no details about facilities other than a statement that there is no difference compared to regular public schools. The application states that funding for charter schools is based on the same formula per student used with regular public schools with the exception of a 5% administrative fee that is deducted. However, comparable dollar amounts per students in charter and regular public schools are not provided in the narrative. In addition the state provides charters with a \$50,000 start up fund, which appears to be the extent of support from the state for charter school start up teams. There is brief mention of the Tulsa KIPP program that is a contract school model but there are no details to determine the accountability structure associated with this innovation model.

# (F)(3) Demonstrating other significant reform conditions 5 2

### (F)(3) Reviewer Comments:

The application makes reference several innovative public school programs in the state. There are two laws cited that support access to higher education coursework for high school students and early childhood education for younger students. There is mention of an external program evaluation but no evaluation data provided in the application to assess program effectiveness nor is there any evidence about the scope of innovative programs and students currently served by these programs in the state's schools.

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# Competitive Preference Priority 2: Emphasis on STEM

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

#### Competitive Reviewer Comments:

The application lists various STEM-related programs currently operating in the state. However, the application lacks documentation of the scope of LEA participation and effectiveness results from these program with regard to increased student achievement. There is the beginning of an organized plan to scale up or expand the programs currently in existence in the state through a much needed STEM Coordinating Council. However, there is no accountability plan with measurable performance targets or an equitable access plan provided in the application to show how the state will ensure equitable distribution of STEM-related learning opportunities to all of its students who are interested in pursuing STEM studies and related careers. STEM funds in the budget are 100% contractual which is not sustainable beyond the grant.

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Total .	:	15	0	
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	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		Yes

### Absolute Reviewer Comments:

The state's application does articulate goals to address the four areas of educational reform. The level of LEA commitment for statewide implementation of actions to meet the goals in this application is not clear. The applicant does not provide clear evidence that it has reforms in place that provide a strong foundation for meeting its new goals. The application is particularly weak in the area of measuring teacher quality and performance-based school accountability. The application does not provide a comprehensive evaluation plan for tracking implementation or impacts from the proposed grant activities. The application does not provide names of vendors and contractors who will conduct most of the proposed activities. This suggests a lack of readiness to implement the plans that it proposes within its timeframes.

Total	:				0	
Grand Tot	al			500	211	

### (D)(4) Reviewer Comments:

(i)The state DOE and Office of Higher Education are working with the National Center for Teacher Quality to develop a system to link student data and teacher preparation programs. Implementation is set for 2011-2012. The intent of this collaboration is to ascertain which preparation programs are yielding students who are successful in improving student achievement. An outside vendor will be hired to analyze student data by teacher and teacher preparation programs. Unsuccessful programs will be pushed to improve. Principal preparation was not addressed.(4pts) The expertise of the National Center for Teacher Quality will help the state produce a high quality product. (ii)Nothing was said about expanding successful programs.(0pts)

### (D)(5) Providing effective support to teachers and principals

20

13

### (D)(5) Reviewer Comments:

Once the longitudinal data system and comprehensive school improvement system are completed, the state will assist LEAs in training teachers and principals in using data to inform instruction and management decisions. The professional development will provide collaborative training opportunities for teachers & principals. The state will provide opportunities to share best practices across LEAs. Assistance will be provided by the state for the development and implementation of induction programs for new teachers and principals (10pts) No evidence was provided in the proposal to show that the state would evaluate and continuously improve the supports. Mention was made of a state sponsored conference to share best practices. That implies that some type of evaluation will occur (3pts)

Total 138 81

### E. Turning Around the Lowest-Achieving Schools

	Available	Tier 1
(E)(1) Intervening in the lowest-achieving schools and LEAs	10	5
(E)(1) Reviewer Comments:  The proposal states that there is authority to intervene in LEAs. The law provided states only schools.	d in the appe	ndices
(E)(2) Turning around the lowest-achieving schools	40	10
(i) Identifying the persistently lowest-achieving schools	5	1
(ii) Turning around the persistently lowest-achieving schools	35	^

### (E)(2) Reviewer Comments:

(i) OK implemented a plan for identifying and turning around the lowest performing schools. They are clear about the process to be used, beginning with the creation of a Turnaround Office at the SEA. They have a set of principles to guide the work. They provided a chart of lessons learned in their past efforts to support schools in need of improvement. The problem lies in the identification of only 5 schools for the entire state. (ii)The proposal notes the complexity of the challenges facing the lowest-achieving schools. Schools will be required to use one of the four RTT models. The transformation model will not be used inappropriately. There doesn't seem to be a broad focus on turning around a significant number of schools in the state. Thus no mention was made of how LEAs will be supported.

Total 50 15

### F. General

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(F)(1) Making education funding a priority	10	<b>5</b>
<ul> <li>(F)(1) Reviewer Comments:         <ul> <li>(i)There was an acceptable increase in state funding. (5pts) (ii)The state has a function provided. There was no information provided to determine equitable funding foots)</li> </ul> </li> </ul>	nding formul or high need	a. It was I LEAs.
(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools	40	16
(F)(2) Reviewer Comments: <ul> <li>(i) There is cap on the number of charters for the state. The law allows for a 33% charters per county. This is a high cap. Only two counties are eligible for charter provides for the use of all four turnaround models. The state says it encourages of innovation by giving successful schools more autonomy. (2pts) (ii) The charter so of the requirements of F(2)(ii). It misses a significant element- use of student ach reauthorization. The state law is provided in Appendix F2-1 70 OS3-130. (4pts) (is student is the same amount as in the state funding formula, less up to five perceivationed by the sponsoring district as a fee for administrative services rendered. It is about the distribution of funds beyond foundational funding. (5pts) (iv) The state of funding for facilities. The state does not impose any facility-related requirements. Says it encourages innovation in LEAs. There is a process for requesting waivers regulations. The state also encourages districts to contract with innovative entities about the autonomy that is granted in a waiver. Tulsa does have one KIPP school.</li> </ul>	schools. The districts to su hool law mee ievement da iii)The funding which may Nothing was does not pro (1pt) (v) The s from state s. Nothing w	e state upport ets many ta in eg per / be said vide state
(F)(3) Demonstrating other significant reform conditions	5	2
(F)(3) Reviewer Comments:  The state has several initiatives that support reform conditions beyond the tradition.  These initiatives are traditional programs. Examples are alternative education programs school students, concurrent enrollment in postsecondary institutions, and a pilot Infants & Toddlers. No information was provided about the effectiveness of these	ograms for all venture-Prog	t risk high

# Competitive Preference Priority 2: Emphasis on STEM

Total

	Available	Tier 1				
Competitive Preference Priority 2: Emphasis on STEM	15	15				
Competitive Reviewer Comments: STEM items are woven throughout the proposal. Appendix P2-1 STEM Map provides a detailed picture of the STEM initiatives in the state.						
тоtal	15	15				

55

23

	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		No
Absolute Reviewer Comments:	m in a samn	robonsiyo
While the state touches on all aspects of the initiative, it did not address all of the and coherent way. There were several aspects of the plan that caused concern.	•	

union leaders who did not sign on. Tulsa is noticeably absent. The graduation rate across the state has shown improvement. No mention was made of how the state will work with the LEAs where the graduation rate is significantly lower than the state average. There are districts reporting a graduation rate of less than 70%. There was no data focused on English Language Learners or students with disabilities. The state has a plan to move to new standards and assessments. Though a timeline was presented, it was not clear that the planners understood the complexity of changing teachers' behavior in classrooms. The application did not provide information about its process to monitor and fill shortages. The state does not provide student growth data for use in evaluation. It was not clear how the state would facilitate the shift to an evaluation model that is dramatically different than those being used now. Improving principal preparation programs and expanding successful teacher preparation programs were not addressed. No information was provided about a system of equitable funding of schools. Though the state is opening a Turnaround Office, the application only identifies 5 persistently low-performing schools. Though the application notes that the state encourages LEAs to seek waivers, nothing was said about what autonomy is granted. The example was given of Tulsa's Kipp school. No information was given about governance or relsease from state, local or union regulations.

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-	Grand Total	500	326	

### F. General

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

### (F)(1) Reviewer Comments:

i. The state INCREASED Education funding as a percentage of state funding slightly (1.1%) from FY2008 to FY2009. ii. The proposal simply states that the state's public school funding formula is "designed to promote vertical and horizontal equity," but this is not described or explained, so there is insufficient evidence to award points for this criterion.

(F)(2) Ensuring successful conditions for high-performing charter schools and	40	15
other innovative schools		

#### (F)(2) Reviewer Comments:

i. While state law puts no statewide caps on charter school establishment or enrollment, it does limit the number of new charter schools per county per year to three. Other requirements of the law have the effect of making it possible to charter schools in only two counties: Tulsa and Oklahoma (location of Oklahoma City). The proposal states that OK intends to remove this county cap, but has not yet done so. Also, state law limits charter schools to LEAs serving at least 5,000 students, meaning only 12 of the state's LEAs can sponsor a charter school. The result of these restrictions is that only the Tulsa and Oklahoma City districts now have charter schools, a combined total of 18. Thus the state does have de facto caps on charters that severely limit their geographic distribution. Therefore, low points are awarded for this component of (F)(2). ii. In the past five years, 14 applications for charter schools have been made, of which 9 have been denied. No charter schools have closed in the past 5 years. Criteria for approval include academic performance and fiscal contractual obligations. No mention is made of the need for charter school student demographics to mirror local district populations. Charters are approved for 5 years and are renewed or not depending on review and analysis of the school's meeting performance and fiscal obligations. The description of the charter school approval/denial process and the applicable accountability measures is sketchy and does not provide sufficient information to know if the state ensures conditions for high-performing charter schools. Therefore, low points are awarded for this component of (F)(2), iii. The proposal states that charter schools receive the same per-pupil state formula funding as regular schools, except for a 5% fee for administrative services provided by the LEA. However, state and federal categorical funding, as well as local funding, is not addressed other than to say that the charter schools are "eligible" for other funds. The actual amount of annual funding per pupil was not provided. Charters are allowed to receive funds from other sources, including grants and donations. The state has a Charter Schools Incentive fund to assist in planning charter applications and covering startup costs up to \$50,000. Partial credit is awarded for this criterion. iv. No mention is made of the state providing funding or other support for charter school facilities. Therefore, no points are awarded for this component of (F)(2), v. The proposal references potential regulatory waivers for LEAs and districts to increase their autonomy, but only mentions one existing contractual arrangement with KIPP for one school in Tulsa as an example of a semi-autonomous arrangement. Therefore, low points are awarded for this component of (F)(2).

# (F)(3) Demonstrating other significant reform conditions 5 1

### (F)(3) Reviewer Comments:

Several other reforms are described in the application. These include alternative education programs for struggling students, concurrent HS/HE enrollment, and the recent approval of Teach for America as an alternative teacher certification route. No data is provided as to whether these reforms have resulted in increased student achievement, narrowing of achievement gaps, or other significant outcomes. Therefore, low points are awarded for this criterion.

Total	55	21
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# Competitive Preference Priority 2: Emphasis on STEM

	Available	Tier 1
Competitive Preference Priority 2: Emphasis on STEM	15	0
Competitive Reviewer Comments:  The proposal includes a very short description of plans to expand existing STEM were not embedded in the main proposal and appear to be an add-on to the corthan integral to it. While the plan touched on the three RTTT STEM priority area courses of study in STEM disciplines, professional development for STEM teach for further study and careers), the plan description was too brief and vague, as activities (STEM Appendix item) to give a good idea of how the intended activitie implemented, and listed no baseline data and measurable targets for improvem	e RTTT plan s (offering rig ners, and prep well as too foo es would be	rather orous paration
Total	15	0

·	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform		Yes
Absolute Reviewer Comments:		
The state has done an adequate job of addressing the four RTTT educat State Success factors, although each area exhibits weaknesses as desc for each criterion.		
State Success factors, although each area exhibits weaknesses as desc		

goals for implementing a statewide turnaround plan are not fully developed on whole. However, there are some strong initiatives here, including the statements about the intent to promote increased use of data on student performance to improve instruction. Applicant describes the need for a different school turnaround plan for the state's two largest urban school districts. Applicant states that these districts will be required to choose one of the four turnaround approaches from the grant program; the state will provide some support to districts as they plan and implement turnaround models. The State's historic performance on school turnaround, as evidenced by the total number of persistently lowest-achieving schools that States or LEAs attempted to turn around in the last five years does not promote confidence that the state sees that it should take an aggressive role in promoting school turnaround. Since 2004-05, Oklahoma has closed 8 schools, restarted 3 schools, transformed 0 schools, and used turnaround at 1 school. Applicant reports that there are 1,783 schools in the state.

1	44000000000000000000000000000000000000		
	Total	50	21

### F. General

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

#### (F)(1) Reviewer Comments:

(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 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. (ii) Except to state "The Oklahoma State Aid Formula, through which LEAs receive support, was designed to promote vertical and horizontal equity," applicant did not address how the state's policies lead to equitable funding (a) between high-need LEAs (as defined in this notice) and other LEAs, or (b) within LEAs, between high-poverty schools (as defined in this notice) and other schools.

(F)(2) Ensuring successful conditions for high-performing charter schools and	40	13
other innovative schools	th Heat (MA)	and a color of the

#### (F)(2) Reviewer Comments:

(i)Although applicant states that Oklahoma's charter school law "does not 'prohibit the increase in the number of high-performing charter schools by the percentage of total schools in the state that are allowed to be charter schools," the law does have the effect to inhibit the increase in the number of high-performing charter schools statewide. There are restrictions in the law that contribute to this effect. Applicant reports on geographical restrictions and annual approval caps. (2/8)(ii)Applicant describes in broad terms that the State has laws, statutes, regulations, or guidelines regarding how charter school authorizers approve, monitor, hold accountable, reauthorize, and close charter schools. Applicant does not provide detail as to how authorizers require that student achievement be one significant factor, among others, in authorization or renewal. Applicant reports that there were 14 applications filed in the last 5 years, that there were 6 applications approved, and 9 applications denied, and no schools closed. Applicant does not provide reasons for these decisions or reconcile these numbers. (2/8) (iii) By stating that charter schools receive full state funding, applicant seems to be making the argument that the State's charter schools receive equitable funding compared to traditional public schools, and a commensurate share of local, State, and Federal revenues. Applicant does not provide evidence of the effect of charter funding policies on per pupil funding equity across sectors.(3/8) (iv) Applicant does not report that the state provides charter schools with funding for facilities (for leasing facilities, purchasing facilities, or making tenant improvements), assistance with facilities acquisition, access to public facilities, the ability to share in bonds and mill levies, or other supports. However, applicant does assert: "The state does not impose any facility related requirements on charter schools that are stricter than those applied to traditional public schools." (4/8) (v) It appears

	that it is possible for LEAs to operate innovative, autonomous public schools other than charter schools, but the details of such waiver programs are not provided. (2/8)		
(F)(3	Demonstrating other significant reform conditions	5	2
(F)(3	Reviewer Comments: The state, in addition to information provided under other State Reform Condition created, through law, regulation, or policy, some additional conditions favorable to innovation that may have increased student achievement or graduation rates, nat gaps, or resulted in other important outcomes. Highlights include the increase in educational opportunities for students who are at a high-risk of dropping out and enrollment opportunities at IHEs. Applicant does not provide sufficient evidence of programs.	o education rrowed achie alternative the concurre	reform o evement ent

## Competitive Preference Priority 2: Emphasis on STEM

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

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500

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#### Competitive Reviewer Comments:

Total

**Grand Total** 

On the basis of what is described in this section and throughout the application, the applicant does not provide sufficient evidence that is has a high-quality plan that meets all of the criteria in this priority. (i) Oklahoma does have some initiatives in place to develop a rigorous course of study in mathematics, the sciences, technology, and engineering. These initiatives are isolated, however, and not infused in curricula across the state. (ii) The applicant has a good plan to cooperate with industry experts, museums, universities, research centers, and other STEM-capable community partners to prepare and assist teachers in integrating STEM content across grades and disciplines. For example, applicant describes its intent to create a STEM Coordinating Council that will work to meet these goals. (iii) Applicant's plan to prepare more students for advanced study and careers in the sciences, technology, engineering, and mathematics is not particularly well developed. One specific shortcoming is that it is not sufficiently clear how applicant intends to address the needs of underrepresented groups and of women and girls in the areas of science, technology, engineering, and mathematics.

Total	15	0
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	Available	Tier 1
Absolute Priority - Comprehensive Approach to Education Reform	The state of the s	Yes
Absolute Reviewer Comments:  To a sufficient extent to meet this priority, applicant has comprehensive of the four education reform areas specified in the ARRA as well as the in order to demonstrate that the State and its participating LEAs are tak education reform. The application is strongest in its plans for improving the plan is rather weak in its strategies for improving teacher and princiturnaround.	State Success Factoring a systemic approstandards and assess	rs Criteria ach to sments;
Total		T