



SUPERINTENDENT OF PUBLIC INSTRUCTION

Randy I. Dorn Old Capitol Building · PO BOX 47200 · Olympia, WA 98504-7200 · <http://www.k12.wa.us>

June 8, 2015

The Honorable Deborah S. Delisle
Assistant Secretary
Office of Elementary and Secondary Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202

RE: Request for Waiver of Provisions of Section 1116(e) of the Elementary and Secondary Education Act Requirement for Supplemental Educational Services

Dear Assistant Secretary Delisle:

On behalf of all local educational agencies (LEAs) in Washington and the Office of Superintendent of Public Instruction (OSPI), I am requesting a two-year waiver of the provisions of Section 1116(e) of the Elementary and Secondary Education Act (ESEA) requirement for Supplemental Educational Services (SES) commencing in the 2015–16 school year.

SES funds are utilized for additional academic instruction that is provided outside of the regular school day and designed to increase the academic achievement of students attending Title I schools in School Improvement Step 2 through Step 5 (second year of improvement and beyond). LEAs that have Title I schools in Step 2 through Step 5 must spend an amount equal to 20 percent of their total Title I, Part A allocation on SES, choice-related transportation, or a combination of both (Title 34, *Code of Federal Regulations* [34 CFR] 200.48[a][2]).

Since the implementation of Public Law 107-110, No Child Left Behind Act, Washington school districts expended approximately \$48,202,663 on SES with little evidence of improved academic achievement by students who participated in the program. This issue is not unique to Washington—a study by Heinrich, Meyer, and Whitten (2010) found no significant changes in student achievement after receiving SES in Milwaukee public schools.¹

¹ Heinrich, C.J., Meyer, R.H., and Whitten, G. 2010. "Supplemental Education Services under No Child Left Behind: Who Signs Up, and What Do They Gain?" *Educational Evaluation and Policy Analysis* 32 (June): 273-298.

OSPI has received complaints and concerns from LEAs, providers, parents/guardians, and employees of providers regarding inappropriate practices of SES providers that include falsifying enrollment, attendance, and invoice documents; students not receiving services; parents/guardians and teachers not receiving feedback on the academic progress of students; and questionable marketing practices. In addition, the U.S. Department of Education's (ED) Office of Inspector General identified numerous cases of fraud and corruption among SES providers in an audit published in October 2013.²

OSPI has a rigorous oversight and audit program and has worked extremely hard to terminate SES providers when they are found in violation of any SES law or regulation. However, the time and effort investigating a complaint and actually terminating an SES provider can take months. In the meantime, LEAs are required to continue to offer SES services until a complaint is resolved.

Heinrich and Burch (2012) reported that "district staff who are responsible for the administration of SES contend that their hands are tied in monitoring providers."³ According to federal guidance (Section 3, E in the SES Non-Regulatory Guidance), an LEA may not ask a state-approved provider to meet additional requirements. And even when an LEA asks OSPI to terminate an unsatisfactory provider, the state's ability to do so is strictly limited by federal rules and regulations.

Given these issues, SES offered by non-LEA providers remain extremely costly for school districts. Research by Heinrich and Burch (2012) noted that extremely high per-pupil provider costs, especially for online programs, limited the hours of service that LEAs are able to provide to a number below what has been shown to be statistically significant in improving student academic achievement.

Washington's Waiver Request **Provisions to be Waived**

OSPI is requesting on behalf of the Washington's 295 LEAs, a waiver of the requirement of Section 1116(e) of the ESEA that LEAs set aside an amount equal to 20 percent of their Title I funding to provide SES that has proven costly, ineffective, and problematic. Instead, OSPI is proposing a system by which LEAs would be required to set aside an amount up to 20 percent of their Title I funds on extended day intervention strategies administered by the LEA and approved by the OSPI.

² <http://www2.ed.gov/about/offices/list/oig/auditreports/fy2013/x42n0001.pdf>

³ Heinrich, C.J. & Burch, P. 2012. "The Implementation and Effectiveness of Supplemental Educational Services: A Review and Recommendations for Program Improvement." American Enterprise Institute for Public Policy Research for Public Policy Research.

Under this waiver request, LEAs will continue to send a letter notifying parents/guardians about a school's improvement, corrective action or restricting status (Step 1 through Step 5). LEAs will continue to set aside an amount equivalent to 5 percent of Title I funds for choice-related transportation (as in 34 *CFR* 200.48[a][2][iii][A]). This waiver will only allow LEAs with Title I schools in Step 2–Step 5 the ability to use funds currently set aside for SES on extended day intervention strategies administered by an LEA and approved by OSPI. The 5 percent set aside for choice-related transportation may come from the 20 percent set aside that is being used to allocate funds for extended day intervention strategies.

Improving Student Academic Achievement

Extended day intervention strategies administered by an LEA would ensure that low income students who are academically deficient in the areas of English language arts (ELA), mathematics, and/or science enrolled in a Title I school in Step 2 through Step 5 are provided the academic assistance they need to meet challenging State academic standards. By having extended day intervention strategies offered on-site, more students would access academic assistance and teachers would receive immediate feedback on the progress of students receiving such services. This continuous feedback—and the improved quality of instruction—will allow our schools to increase student achievement and improve academic performance.

Improving Quality of Instruction for Students

The quality of instruction would increase due to intervention strategies being facilitated and monitored by highly qualified teachers. In addition, curriculum being used would be aligned to the most recent Washington's state standards and/or the most recently adopted curriculum approved by each LEAs school board of directors. The curriculum would coincide and compliment the curriculum being offered in a student's classroom because the extended day intervention strategies would be administered by the same LEA.

OSPI believes this change would also benefit parents/guardians by eliminating transportation issues to and from an off-site SES provider because all intervention strategies would be offered at the student's school. This means parents/guardians would not be responsible for arranging or providing transportation between a school site and an SES off-site location. Additionally, parents/guardians would not be forced to choose annually between providers that offer minimal information about the quality and long-term success of their programs.

Extended Day Intervention will Serve the Same Students as the Current SES System Program

Extended day intervention would be offered to low income eligible students who are low performing in the areas of English language arts, mathematics, and/or science and are enrolled in a Title I school in Step 2 through Step 5. This is the same population of students who would otherwise qualify for SES services under ESEA.

Quality Standards and Achievement Goals

LEAs would be required to uphold the following standards in order to be approved by the OSPI to offer extended day intervention strategies:

1. All intervention strategies will be administered by an LEA and may be offered before school, after school, intercession, and/or during summer school.
2. All activities would be monitored by a highly qualified teacher employed by the LEA that is administering the extended day interventions strategies.
3. All instruction provided during extended day intervention strategies may be offered by highly qualified teachers and/or tutors employed by the LEA that is administering the extended day intervention strategies.
4. All curriculum used during intervention strategies would be aligned to the most recent Washington state standards and adopted by the local school board of directors.
5. LEAs must report all expenditures for extended day intervention strategies in the state's Title I district application and the end-of-the-year report through iGrants in order to ensure fiscal integrity and allowability of expenditures.
6. LEAs must provide student evaluation data that demonstrates that each participating student meets or exceeds progress toward achieving annual student achievement goals in English language arts, mathematics, and/or science (see below).

The annual achievement goals for extended day intervention strategies set forth by the OSPI are as follows:

- The number of students in an LEA who have not met or nearly met performance standards in English language arts and mathematics will decline by 1 percentage point each year in all grade spans during the 2016–17, 2017–18, and 2018–19 school years.

A waiver of the SES requirement will assist LEAs in securing improved student academic achievement by ensuring that extended day intervention strategies are of high quality, closely monitored, and cost-efficient.

If a waiver of Section 1116(e) of the ESEA for SES is granted and LEAs with Title I schools in Step 2 through Step 5 are allowed to use funds previously set aside for SES on extended day intervention strategies, OSPI would report to the ED the following information:

- Number of low income eligible students who participated in extended day intervention strategies during the 2015–16, 2016–17, 2017–18, and 2018–19 school years.
- Overall number of eligible students not meeting or nearly meeting performance standards in English language arts and mathematics during the 2016–17, 2017–18, and 2018–19 school years.
- Amount of funds expended by LEA on extended day intervention strategies during the 2015–16, 2016–17, 2017–18, and 2018–19 school years.

Notice and opportunity to comment has been offered to Washington's 295 LEAs and the general public.

Prior to submitting this waiver request, OSPI provided all LEAs in the state with notice and a reasonable opportunity to comment on this request. OSPI provided such notice by posting on the OSPI website and by sending out notification via email to a variety of stakeholders. The state received one public comment regarding the intent of OSPI to request this waiver. The state received 12 LEA comments regarding the intent of OSPI to request this waiver.

OSPI believes this waiver would be beneficial for all participating students and would improve the academic performance of low income students throughout Washington. OSPI believes that LEAs are the best qualified to implement tutoring or other supplemental academic enrichment services that are of "high-quality, research-based, and specifically designed to increase student academic achievement" (ESEA, Section 1116[e][12][C]). In addition, funds would be better utilized by allowing LEAs to administer extended day intervention strategies on campus and would reach more eligible students in need of academic assistance statewide. Allowing these programs to be administered by LEAs would increase fiscal and programmatic accountability and reduce overhead costs, leading to a more direct benefit to students.

To date, there has been 43 states that have been granted ESEA flexibility, with the majority not providing SES. This proves there is a demand to remove the requirement of

Assistant Secretary Delisle
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SES and substitute other interventions that are more effective for districts, schools, and students.

If you have any questions regarding this request, please contact me at 360-725-6170 or gayle.pauley@k12.wa.us.

Sincerely,

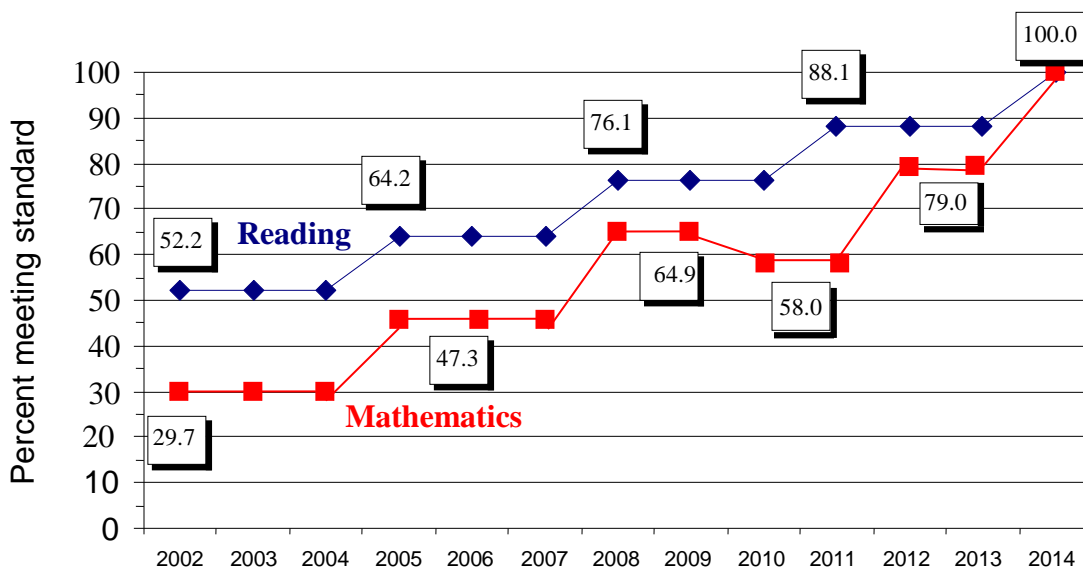
A handwritten signature in black ink that reads "Gayle Pauley". The signature is written in a cursive style with a large, sweeping initial "G".

Gayle Pauley
Assistant Superintendent
Special Programs and Federal Accountability

Attachment A: Reading and Mathematics AMOs
Attachment B: Copy of District Notice and District Comments
Attachment C: Copy of Public Notice and Public Comment

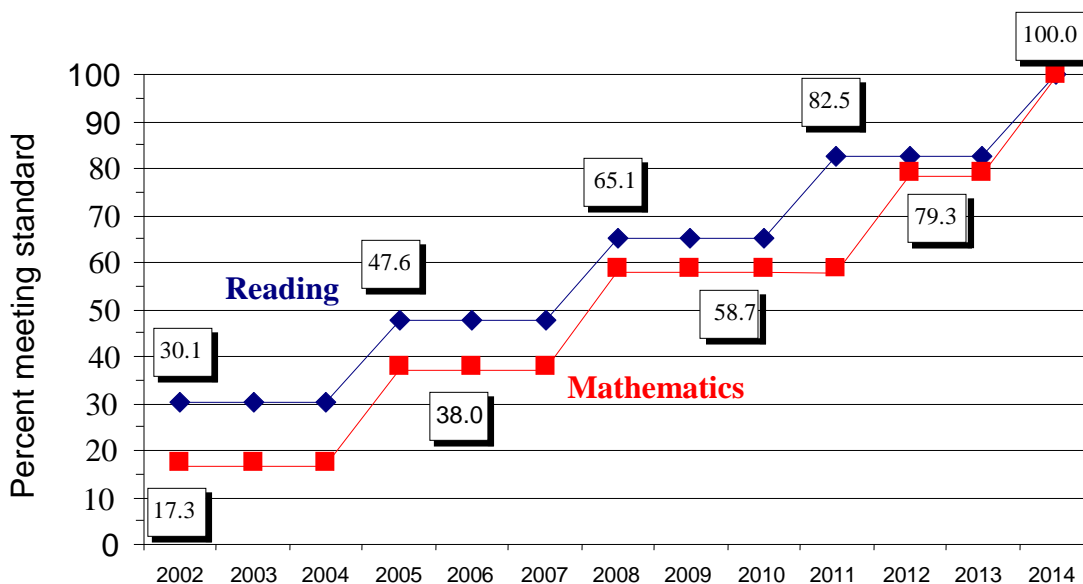
Reading and Mathematics AMOs

Elementary Uniform Bar (3–5)



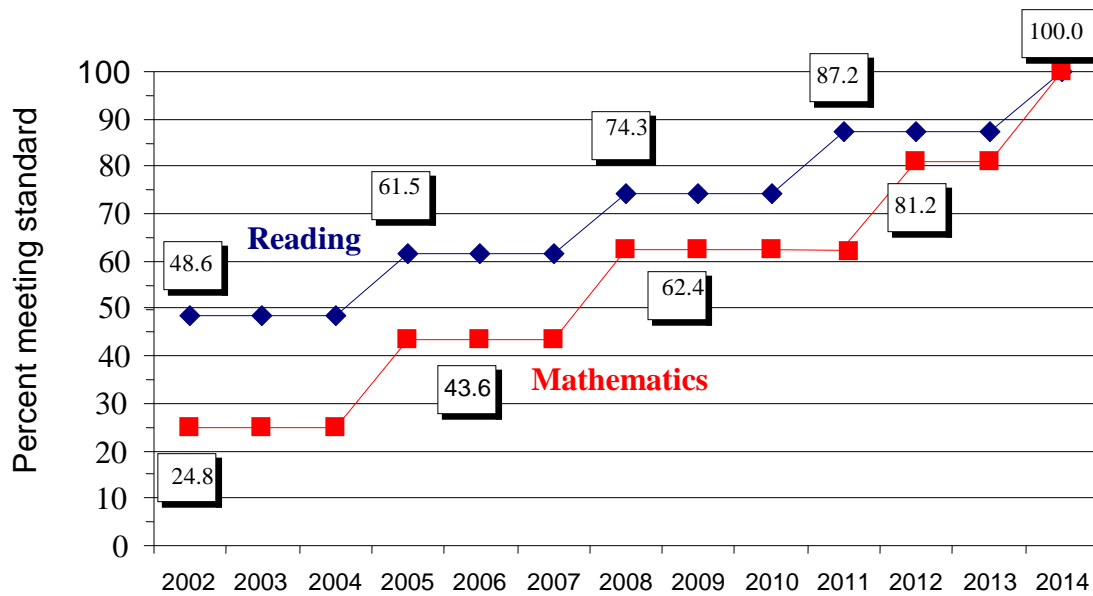
NOTE: The state uniform bar changed for 2010–13 based upon new cut scores on the mathematics assessments.

Middle School Uniform Bar (6-8)



NOTE: The state uniform bar changed for 2010–13 based upon new cut scores on the mathematics assessments.

High School Uniform Bar



NOTE: The state uniform bar changed for 2011 based upon new cut scores on the high school mathematics assessment.

Copy of District Notice and District Comments

District Notice

Notice to public school districts of the Office of Superintendent of Public Instruction's (OSPI's) intent to apply to the U.S. Department of Education (USDE) for a waiver, for Supplemental Educational Services commencing in the 2015–16 school year.

The Office of Superintendent of Public Instruction is required to notify Washington public school districts of the state's intent to request this waiver. Districts are asked to provide comment on the waiver request to OSPI. Comments from districts will be included in OSPI's request to the USDE.

Please send comments to Carrie Hert at carrie.hert@k12.wa.us, by close of business on Tuesday, May 26, 2015.

Washington's Waiver Request

Provisions to be Waived

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3. All instruction provided during extended day intervention strategies may be offered by highly qualified teachers and/or tutors employed by the LEA that is administering the extended day intervention strategies.
4. All curriculum used during intervention strategies would be aligned to the most recent Washington state standards and adopted by the local school board of directors.
5. LEAs must report all expenditures for extended day intervention strategies in the state's Title I district application and the end-of-the-year report through iGrants in order to ensure fiscal integrity and allowability of expenditures.

6. LEAs must provide student evaluation data that demonstrates that each participating student meets or exceeds progress toward achieving annual student achievement goals in ELA, mathematics, and/or science.

Washington's Plan

If a waiver of Section 1116(e) of the ESEA for SES is granted and LEAs with Title I schools in Step 2 through Step 5 are allowed to use funds previously set aside for SES on extended day intervention strategies, OSPI would report to the ED the following information:

- Number of low income eligible students who participated in extended day intervention strategies during the 2015–16, 2016–17, 2017–18, and 2018–19 school years.
- Overall number of eligible students not meeting or nearly meeting performance standards in ELA and mathematics during the 2015–16, 2016–17, and 2017–18, and 2018–19 school years.
- Amount of funds expended by LEA on extended day intervention strategies during the 2015–16, 2016–17, 2017–18, and 2018–19 school years.

District Comments

Dear Office of Superintendent of Public Instruction,

Thank you for applying for the waiver concerning the requirement of Section 1116(e) of the ESEA that LEAs set aside an amount equal to 20 percent of their Title I funding to provide SES that has proven costly, ineffective, and problematic for our school district. With enthusiasm and integrity, we attempted to implement SES in our district this year and found it to be time consuming, frustrating and lacking results. We believe that our school district will better meet the needs of our students – we know them best and we have qualified staff to fill this need.

Thank you,
Karen Douglass
Title 1 / LAP Director
Stevenson-Carson School District
douglassK@scsd.k12.wa.us

I have questions regarding the waiver request:

1. Since the district has to set the 20% aside for the extended day program(s), would they then have to submit a release of unexpended set aside funds request later in the year (similar to FP 557)? If so, how would this work for and August summer school program? Or could they just explain why they didn't have to use all of the set aside funds when completing the Title I end of year report (FP 244)?

2. What does it mean by highly qualified tutors?

I also have a comment:

Thank you soooo much for trying to make the SES sanctions of NCLB more effective for meeting the needs of students! I think the waiver definitely moving in the right direction!

Judi Jensen

Title I Director Services

North Central Educational Services District

judij@ncesd.org

Bremerton School District supports this waiver request. This past school year 300 of our students missed out on effective before school intervention for the first 5 months of school while we had to wait for release of SES funds.

Linda Sullivan Dudzic

Linda.sullivan@bremertonschools.org

I commend Washington State for the thoughts and planning in addressing the ineffective current requirement of ESEA to implement SES. In Bellingham, this waiver is consistent with our current efforts based on research around extended day programming to support our low income students. Overall, we think the plan has extreme potential to help us align our interventions for our students not meeting standard with current instructional practices in our district, and to be able to tightly coordinate and monitor those students' plans at the site level. Please make sure that transportation for these extended day programs continues to be an allowable cost to insure we are removing barriers to accessing programs for our students.

Thank you,

Stephanie Korn

Director of Teaching and Learning

Bellingham Public Schools

Stephanie.korn@bellingshamschools.org

Tacoma votes YES!!!! This is what is best for kids and provides continuity in instructional practices.

Tracye Ferguson

Director of Title I/LAP and Early Learning

253.571.1049

afergus@tacoma.k12.wa.us

From a district's perspective the waiver for SES services is a great idea.

To say the least SES has been a huge burden for our district:

1. We are only allowed to put a small portion of our set asides towards administrative costs for SES. This has taken a huge toll on manpower, we have to do the work, but we can't pay for the work someone does. Our grants manager spends at least 4 to 5 hours a week, answering emails from providers, drawing up contracts, checking invoices, reading and approving plans, making sure attendance is correct, checking fingerprints and the list goes on. That work takes away from her other work.
2. Our providers, in our rural area, have been less than responsive. Our local ESD 105 even refused to serve students after parents had chosen them. We currently have over 150 students sitting out there either waiting for service or not being served because they chose providers who either aren't willing to serve or got a late start. This money had to be encumbered and held which has caused us to have a huge amount of money we are unable to carry over. We also know our students didn't and aren't getting served.
3. We are unable as a district to recoup the amount set aside for each student. We can only charge actual costs. Hence we had money left over from that pot of money.
4. Principals and teachers complained that the program that was run wasn't as effective as running our own program for the past two years. We have not looked at scores from assessments so we don't know if that is true, but we do know we served less students.

This waiver would go a long way in helping rural districts deal more effectively with after school services and intervention.

Thank you for doing the waiver.

Paulette Johnson
Director of Teaching, Learning and Assessment Sunnyside School District
1110 South 6th Street
Sunnyside, WA 98944
509-836-8722
Paulette.johnson@sunnysideschools.org

I have one small suggestion regarding the notice sent out may 15 from Julie Chace regarding the SES waiver. Under paragraph 1 "Provisions to be waived" , first sentence, could it be added to the sentence– SES that has proven costly, ineffective, and problematic...something to the effect of "SES that has proven costly, ineffective, and problematic in ensuring academic support to students most in need. I recognize this is detailed further on in the waiver but the focus needs to remain on the fact that our students are the ones who have not been given the quality and timely instruction (in cases) to help them be successful.

Linda Hoste
Title I Facilitator
Renton School District
Kowhles Education Center
300 SW 7th St., Renton, WA 98057
Tel: 425-204-2295
Linda.hoste@rentonschools.org

I have some comments regarding this waiver. First of all I have been coordinating SES for our school district this year and in the 3 years leading up to our state's Flexibility waiver. So, I have a lot of experience with all the frustrations and concerns about SES. I have seen it be a meaningful learning experience for an extremely low number of students. I wholeheartedly support this waiver application as a possible solution if we do not get the flexibility waiver back or reauthorization does not occur in a timely fashion.

My input about the waiver:

- The waiver states that "Extended day intervention will serve the same students as the current SES System Program" and at the same time states "low income students who are academically deficient." Our current SES eligibility is low income only. We are not able to prioritize by academic need until we have more students requesting services than slots available to them. That has never been the case in my district the 4 years I have coordinated SES. In my district this year - I had a student receive SES services who is also one of our Highly Capable students. This has always been my biggest frustration about SES eligibility. A low income high achiever could access services and a low achieving student whose family is barely above the low income line could not receive SES services. I would like for us to be able to simply serve students who are academically deficient - period - regardless of income level. Just like their eligibility for Title I support in our schools. If the poverty piece must be left in the waiver it really needs to be low income AND academically deficient and not left to be the same eligibility as the current SES system.
- "Extended day intervention would be offered at the student's school." This is ideal and works nicely in most cases. However, it would be nice if there was the addition of some options for districts if there is a need to bus students to another eligible building for services. I am thinking in terms of one of our Title I buildings that runs a very large Century 21 grant program afterschool and a large portion of the building is utilised. We may not be the only district with some unique circumstances at some buildings.
- "Instruction offered by highly qualified teachers and/or tutors employed by the LEA." I would like to see this changed to Highly qualified staff - thereby allowing us to employ some highly qualified instructional assistants (working under the supervision of the certificated teacher monitoring the program activities).

Thanks for your work helping the state apply for this much needed waiver for SES!

Jenn Angelis
Grant Coordinator
Burlington-Edison School District
360.757.3311 x1046
jangelis@be.wednet.edu

This is in response to the waiver request of Section 1116(e) of the ESEA that OSPI will be making to the USDE on behalf of Washington State school districts:

The Renton School District had to set aside approximately \$707,000 for Public School Choice and Supplemental Educational Services in the 14-15 school year. We have had nearly 500 students choose SES to receive approximately twenty tutoring sessions each (the maximum amount due to state per pupil allocation). Our district worked with 25 different providers and spent an inordinate number of hours attempting to ensure that quality services were offered to our students in a timely manner. Many additional providers signed up our students and then cancelled services because they did not have tutors or space or decided that too few students had signed up with them. Due to these circumstances, many of our families decided to drop out of or not pursue SES opportunities.

When monitoring the quality of services, we were often confronted with outdated and ineffective practices by many providers. Since providers are not held to the same standards that school districts are, we noted that many providers used tutors that would not meet highly qualified status in our schools. We have had to constantly pursue providers on behalf of our students to follow through on their obligation to the families. We have had to act as an advocate for many of our families with SES providers which is not the envisioned relationship between SES provider and school district.

The alternate proposal from OSPI to allow districts to use the 20% on extended day intervention strategies within the school district would improve both the access and quality of "supplemental education". By having the design of the interventions under district control, we would be able to ensure alignment to current state standards and quality instruction by highly qualified staff. Parent communication would be direct and parents would receive much better information and customer service. Had this system been in place this past school year, I know that we would have maximized the 20% to provide quality services to our students and the interventions would have been much more likely to result in improved student achievement.

We are in full support of a waiver of Section 1116(e) of the ESEA for future school years and commend OSPI for requesting this on our behalf.

Vickie Damon
Director of Student & Family Support Services
Renton School District
Vickie.damon@rentonschools.us

After reading through this document more thoroughly, I have further questions regarding the waiver request...

- Would tutoring in science be allowable, if the waiver is approved? It sounds like that was available prior to the waiver, but I thought it was only mathematics, reading and/or language arts...

- In reference to this section: Extended Day Intervention will Serve the Same Students as the Current SES System Program

“Extended day intervention would be offered to low income eligible students who are low performing in the areas of ELA, mathematics, and/or science and are enrolled in a Title I school in Step 2 through Step 5. This is the same population of students who would otherwise qualify for SES services under ESEA”—Isn't ANY low income student enrolled in a Title I school in Steps 2-5 eligible for SES services, regardless of how they are performing academically (unless there are more students applying for SES than slots available)?

Judi Jensen
Title I Director Services
North Central Educational Services District
Cell 509.771.1693
Fax 509.662.9027
PO Box 1847
430 Olds Station Rd
Wenatchee, WA 98801
www.ncesd.org
judij@ncesd.org

As Director of Student Services for Highland I attend meetings with Grant Managers in the ESD 105 area. At each meeting we have discussed and offered each other ideas about how to deal with the implementation of SES in our individual districts as we try to meet all of the requirements necessary to be compliant.

The provisions outlined in the SES Waiver request would go a long way to address the issues program directors have been dealing with all year including but not limited to

- Providers ultimately not serving students in a timely fashion, if at all
- Providers who indicate they are able to provide bilingual services and yet they call the district and ask if we can contact the families in Spanish
- Tutors who, while they have satisfied the background checks, have limited educational experience in working directly with students
- Student learning plans that have little if any relationship to what's going on in the classroom
- Lack of communication from providers to the schools/teachers
- Poor communication with parents
- Questionable location selections – McDonalds, Red Lion Hotel, etc.
- Lack of evidence that tutoring provided had any impact on the individual student's achievement

- Administrative burdens in contract development, billing, tracking service hours, etc.

As written the SES Waiver outlines a means for schools to address the needs of their students using the curriculum and tools that are familiar to teacher and student alike. Schools required to provide SES are already implementing new curriculums and programs in efforts to improve their students' achievement. Adding structured and specifically directed extended learning time would provide the additional time the teachers and students need. Additionally, parents would know who was working with their students rather than trying to make decisions on programs or services that they have little understanding of or means to make informed selections. I have written this comment on the behalf of the ESD 105 grant managers listed below. Thank you for your consideration.
Barbara Gilbert – Highland

Theresa Laffey – Yakima
Lori Gylling – Naches
Scott Fisher – Mabton
Janet Wheaton - Granger

Ima Terry – Wahluke
Dawn Williams – West Valley (Yakima)
Anastasia Sanches – Toppenish

Barb Gilbert
bgilbert@highland.wednet.edu

I was at the Spring Title 1/ LAP Workshop yesterday and applying to be an SES provider was discussed with a July 1st application deadline. I just want a little bit of clarification. The waiver OPSI is requesting around SES tutoring if granted would again allow ALL districts to use the SES set-aside for before/afterschool tutoring and doesn't require us to have applied to be an SES provider? I heard conflicting information yesterday from individuals I was sitting with. I just want some clarification as to if I should be apply for our district to be an SES provider for next year.

Thank you,
Laurinda (Rinny) Shelton
Sedro-Woolley School District
Title 1, LAP, McKinney-Vento Program Coordinator
(360) 855-3879
rshelton@swsd.k12.wa.us

Copy of Public Notice and Public Comment

Public Notice

Public Notice for OSPI Request for Waiver of Provisions of Section 1116(e) of the Elementary and Secondary Education Act Requirement for Supplemental Educational Services

Notice to the public of the Office of Superintendent of Public Instruction's (OSPI's) intent to apply to the U.S. Department of Education (USDE) for a waiver, for Supplemental Educational Services commencing in the 2015–16 school year.

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student achievement and improve academic performance.

Improving Quality of Instruction for Students

The quality of instruction would increase due to intervention strategies being facilitated and monitored by highly qualified teachers. In addition, curriculum being used would be aligned to the most recent Washington's state standards and/or the most recently adopted curriculum approved by each LEAs school board of directors. The curriculum would coincide and compliment the curriculum being offered in a student's classroom because the extended day intervention strategies would be administered by the same LEA.

OSPI believes this change would also benefit parents/guardians by eliminating transportation issues to and from an off-site SES provider because all intervention strategies would be offered at the student's school. This means parents/guardians would not be responsible for arranging or providing transportation between a school site and an SES off-site location. Additionally, parents/guardians would not be forced to choose annually between providers that offer minimal information about the quality and long-term success of their programs.

Extended Day Intervention will Serve the Same Students as the Current SES System Program

Extended day intervention would be offered to low income eligible students who are low performing in the areas of ELA, mathematics, and/or science and are enrolled in a Title I school in Step 2 through Step 5. This is the same population of students who would otherwise qualify for SES services under ESEA.

Quality Standards and Achievement Goals

LEAs would be required to uphold the following standards in order to be approved by the OSPI to offer extended day intervention strategies:

1. All intervention strategies will be administered by an LEA and may be offered before school, after school, intercession, and/or during summer school.
2. All activities would be monitored by a highly qualified teacher employed by the LEA that is administering the extended day interventions strategies.
3. All instruction provided during extended day intervention strategies may be offered by highly qualified teachers and/or tutors employed by the LEA that is administering the extended day intervention strategies.
4. All curriculum used during intervention strategies would be aligned to the most recent Washington state standards and adopted by the local school board of directors.
5. LEAs must report all expenditures for extended day intervention strategies in the state's Title I district application and the end-of-the-year report through iGrants in order to ensure fiscal integrity and allowability of expenditures.
6. LEAs must provide student evaluation data that demonstrates that each participating student meets or exceeds progress toward achieving annual student achievement goals in ELA, mathematics, and/or science.

Public Comment

The OSPI Request for Waiver of the Elementary and Secondary Education Act Requirement does not fully address the needs of every student. Furthermore, the waiver request fails to mention the original cause behind Washington State's waiver revocation in 2014. If the state is considered for a waiver grant, than it must first comply with Federal requirements that teachers' evaluations are tied to students' test scores. Following the theme of the waiver request, below is a viewpoint of the current condition of the SES program from a provider.

Improving Student Academic Achievement:

While I agree that the end result of supplemental education is to see the greatest amount of Academic Achievement possible, I disagree with the proposed approach. The problem for a lot of these students is the current scholastic environment. A student that has already been at school all day, most likely struggling through their curriculum, will not benefit from an extended day at school. Students need a chance to decompress before receiving additional instruction.

Immediate feedback to the teachers is a great idea. A continuous feedback loop between the tutors, student, and teachers could easily be adapted into the current SES reporting tools.

Improving Quality of Instruction for Students:

The quality of instruction under both the current SES program and that of the proposed Extended Day Intervention strategies would be similar. Under the current model, SES programs are approved by the school district and are directed to conform to the current state standards and school curriculum. In fact, providers must turn in lesson plans that show what is happening in sessions. The idea that the students would benefit more from eliminating transportation issues is a flimsy argument. If in fact some students are not able to benefit from SES, it is not due to a transportation problem. Parents have the option of choosing in-home tutoring services. By allowing the student to separate from the social aspects of school, the in-home tutoring option allows them to fully commit to the learning tasks at hand.

The opportunity for a parent/guardian to select a provider is a great option, not a retractor. The quality of the providers should be pre-selected by OSPI prior to the parents even having the opportunity to select. This selection process also grants the parents more flexibility in choosing an appropriate provider that matches their students' needs most appropriately. By having the only option become the proposed Extended Day Intervention, you take away the option of parents to have one-on-one tutoring at an offsite (or in-home) location that may benefit their student the most.

Quality Standards and Achievement Goals:

1. Current SES programs offer the same availability without the need for the school to be open (winter breaks, weekends, spring breaks, etc.)
2. Current SES activities are monitored by an approved SES provider and must report back to the current LEA.
3. Most current SES providers utilize teachers and professors that are of the highest quality. While not having to be tied to a direct school, the providers have more access to select a tutor more appropriate to a specific learning opportunity.
4. All current SES programs must align with Washington State standards.
5. SES providers must track all expenditures and time with reporting systems.
6. Current SES providers track grade level progression utilizing pre and post testing. The goals set forth by the state measure the same.

If the current state of the SES program is not providing the expected level of improvement, some slight changes could be made in order to improve its process. I would suggest only allowing one on one or small group (2 to 3 people) tutoring. By eliminating some of the online tutoring or large group environments, you create a more intimate approach to teaching. This is what the students need. Additionally, you could utilize the past years data to find the tutoring companies that achieved the highest level of improvement for selection the following year. By eliminating some companies that have not performed up to expectations, you are raising the level of educational opportunities that are available to parents to select from.

Brandi Elder

Brandi@bettergradestutoring.com