



TITLE I SCHOOL RESTRUCTURING

GUIDANCE AND POLICY

2014

Wyoming Department of Education

Hathaway Building, 2nd Floor
2300 Capitol Avenue
Cheyenne, WY 82002-0050

Jennifer Peterson
Title I Program Director
jennifer.peterson@wyo.gov
(307) 777-6216

Scott Bullock
Title I Program Consultant
scott.bullock1@wyo.gov
(307) 777-6260



Table of Contents

Introduction	3
Background	3
Common Terms and Definitions	4
USED Non-Regulatory Guidance	5
School Improvement Year 4 – Restructuring (Planning).....	6
Continue Corrective Action.....	6
Ongoing Notifications	6
Additional Requirements during Restructuring Planning	7
Preparing for the Restructuring Plan Development	7
Data Review	8
Selecting a Restructuring Option and Supporting Interventions.....	8
WDE Support and Technical Assistance.....	9
Wyoming State Board of Education Reports	9
Restructuring Plan Submission	10
Restructuring Plan Approval	10
School Improvement Year 5 – Restructuring (Implementation)	12
Plan Implementation	12
Holding Status	12
Restructuring Planning and Implementation Flowchart.....	13
Restructuring Planning and Implementation Timeline.....	14
School Improvement Team and Technical Assistance.....	15
Restructuring Plan Checklist	16
School Improvement Team.....	16
Restructuring Option	16
Restructuring Process and Interventions.....	17

INTRODUCTION

Background

A school that has failed to meet Adequate Yearly Progress (AYP) in the same content area for five or more years is identified for restructuring in accordance with Public Law 107-110 Section 1116 (b)(8). The school's Local Educational Agency (LEA) must create a plan to restructure the school. If the school does not make AYP for six years, the LEA must implement this plan.

According to the US Department of Education's (USED) LEA and School Improvement Non-Regulatory Guidance, revised July 21, 2006:

Generally speaking, under NCLB when a school is in restructuring status, the LEA must take intensive and far-reaching interventions to revamp completely the operation and governance of that school. Restructuring means a major reorganization of a school's governance structure arrangement by an LEA that:

- *Makes fundamental reforms, such as significant changes in the school's staffing and governance, to improve student academic achievement in the school;*
- *Has substantial promise to improve student academic achievement and enable the school to make AYP as defined by the State's accountability system; and*
- *Is consistent with State Law.*

When a school is in restructuring status under NCLB, the school must implement a restructuring plan using one of the following options:

1. Reopen the school as a charter school;
2. Replace all or most school staff relevant to failure;
3. Contract with a private management to govern the school;
4. Allow the SEA to take over governance of the school (this option will not be considered by the WDE as it is not viewed as a viable option); or
5. Implement any other major restructuring of the school's governance.

This last option gives an LEA the flexibility to best meet the needs of the school. Some examples of the "other" option from USED Non-Regulatory Guidance are:

- Significant change in governance structure such as diminishing the school-based management or increasing control and monitoring by the LEA;
- Reopen the school as a focus or theme school with new staff such as a Math/Science, Dual Language, or Communication Arts school;
- Reconstitute into smaller autonomous learning communities such as a School-Within-A-School or Learning Academies approach;

- Dissolve the school and assign students to other schools within the LEA;
- Pair the school with a higher performing school; and
- Expand or narrow the grades served by, for example, changing the school from K-8 to K-5.

Common Terms and Definitions

- Adequate Yearly Progress (AYP) – AYP is a federal measure used to determine if schools across the country are successfully educating their students under No Child Left Behind (NCLB).
- Local Education Agency (LEA) – A public school district.
- No Child Left Behind (NCLB) – NCLB is a federal act that is the reauthorization of the Elementary and Secondary Education Act (ESEA) which includes the Title I program for aid to disadvantaged students.
- School Improvement Plan (SIP) - The purpose of the school improvement plan is to improve the quality of teaching and learning in the school so that greater numbers of students achieve proficiency in the core academic subjects of reading and mathematics.
- School Improvement Team – The School Improvement Team is responsible for the development of the school restructuring plan. The team is comprised of the LEA’s Senior Leadership Team (SLT), school principal and leadership, parents, community members, school staff and teachers, school staff from feeder schools (for secondary schools), and a representative from the local LEA’s school board.
- Senior Leadership Team (SLT) – The Senior Leadership Team is responsible for the creation and implementation of the school restructuring plan. The team is comprised of the school district Superintendent and district core administrators.
- State Educational Agency (SEA) – The Wyoming Department of Education.
- Restructuring Intervention – When a school is in restructuring status under NCLB, the LEA must take intensive and far-reaching restructuring interventions to revamp completely the operation and governance of that school.
- WDE Assigned Representative – A member of the WDE that will assist in the restructuring effort. The WDE Assigned Representative will be the primary contact between the WDE and the LEA.

- Wyoming State Board of Education (WSBE) – The WSBE establishes policies for public education in Wyoming, implements and enforces the uniform standards for educational programs, and prescribes uniform student content and performance standards.

USED Non-Regulatory Guidance

The U.S. Department of Education’s “LEA and School Improvement Non-Regulatory Guidance” (Revised July 21, 2006) is available online at:

<http://www2.ed.gov/policy/elsec/guid/schoolimprovementguid.doc>

SCHOOL IMPROVEMENT YEAR 4 – RESTRUCTURING (PLANNING)

Continue Corrective Action

While in School Improvement Year 3, Title I Schools will be contacted by the Wyoming Department of Education in preparation for the possibility of entering the Restructuring Planning status. The WDE will work collaboratively with the LEA's Senior Leadership Team (SLT) and school principal to provide an overview of the restructuring process. Input will be taken from the LEA to meet individual LEA's needs should the school move into planning for restructuring the following year.

If the school does not meet AYP after School Improvement Year 3, the LEA will review and revise the existing corrective action plan as necessary. The school will continue with implementation of the corrective plan while in School Improvement Year 4.

While in School Improvement Year 4, Title I Schools will be required to sustain their corrective action plan implemented in year three of improvement. Evidence of this will be requested in the school monitoring protocol.

Ongoing Notifications

Once a school enters School Improvement Year 4, the LEA must:

- Notify parents and teachers that their school has failed to meet Adequate Yearly Progress (AYP) and that the school has been identified for restructuring;
 - Explain what the identification means and how the school compares to other elementary and secondary schools served by the district in terms of the academic achievement;
 - Provide the reason(s) for the school being identified for improvement;
 - Provide Public School Choice options (to transfer to another school in the LEA that has not been identified for improvement) available to all students at least 14 days before the beginning of the school year;
 - Provide Supplemental Educational Services (SES) to eligible low-income, low-achieving students.
- Allow parents and teachers the opportunity to comment on the restructuring prior to taking any action; and
- Involve parents and teachers to participate in the development of the school's restructuring plan;

For more information, the WDE has additional guidance and details on their website regarding Choice, SES, and notification requirements.

Additional Requirements during Restructuring Planning

Set-aside 20% of the total Title IA allocation for Choice transportation and Supplemental Educational Services (at least 5% must be set-aside for transportation and 5% to SES, with the remainder 10% placed where needed.) If Choice is not optional, all 20% of the allocation should go to SES. This set-aside can be taken from funds other than Title I, if the district wishes, but must equate to 20% of total Title IA allocation.

The 10% set-aside of each building allocation for professional development related to school identification is still optional, but it is recommended by USED. This must be taken from Title IA funding and the whole set-aside must be spent on PD if set-aside.

For both Choice and SES, the LEA will post on their website the number of eligible students (all students in the building for Choice and low-income/low-achieving for SES), number of students who participated, and a list of available transfer schools. A list of SEA approved SES providers will also need to be made available to the public.

Preparing for the Restructuring Plan Development

The WDE will conduct informational sessions during August for LEAs to discuss:

- The background, purpose, requirements, and timelines for restructuring plan development;
- The approval process of the restructuring plans; and
- The WDE's role and support to be provided.

A WDE assigned representative will provide additional support and technical assistance to each LEA. The WDE assigned representative will work with the LEA's SLT to schedule an initial meeting to set timelines and action steps to complete the restructuring plan in a timely manner. When appropriate, the WDE assigned representative for the LEA will assemble additional WDE staff to share and provide expertise to each LEA with a school in School Improvement Year 4. The core members of this WDE team will consist of: State Title I Director, WDE assigned representative, relevant program specialists, and any other WDE staff that are needed to meet the individual needs of the LEA. Additional resources required need to be coordinated with the WDE assigned representative.

The makeup of the current School Improvement Team will be reviewed and adjusted accordingly to meet the needs of the restructuring planning process. Key stakeholders from the LEA and the school should include parents, school staff and teachers, school principal and leadership, a representative from the LEA SLT, LEA School Board Member, and a WDE representative should be included in the planning process. Middle or secondary schools in restructuring will be encouraged to include schools within the district that feed/send students

to that school for the improvement planning process (in order to better determine issues that are evident prior to entering the middle or secondary school).

The School Improvement Team, LEA's SLT, and WDE will work collaboratively on the development of the Restructuring Plan. The School Improvement Team is required to review data, research options for restructuring, choose an option, develop the plan, and obtain the final approval of the plan from the WDE and WSBE. The LEA should provide leadership in the development of the plan and meeting requirements.

Data Review

The LEA must review student achievement data (and any other pertinent data) to identify the reason(s) why the school has not successfully met AYP. Prior to selecting a Restructuring Option, the LEA must provide a clear description of the data and reasoning supporting the choice.

Selecting a Restructuring Option and Supporting Interventions

In Wyoming, the restructuring plan that an LEA prepares must include one of the following "alternative governance" arrangements for the school:

- Reopen the school as a public charter school;
- Replace all or most of the school staff, which may include the principal, who are relevant to the school's inability to make AYP;
- Enter into a contract with an entity, such as a private management company, with a demonstrated record of effectiveness, to operate the school as a public school; or
- Implement any other major restructuring of the school's governance arrangement that is consistent with the NCLB principles of restructuring.

The LEA will provide information that supports the Restructuring Option chosen within the Restructuring Plan to include:

- A detailed explanation of why the option was selected and the supporting evidence behind why this option would work;
- What data will be used to measure the success of the restructuring efforts; and
- How the LEA and school will determine the effectiveness of this option.

A list of restructuring interventions to support the LEA's restructuring selection is available on the WDE's website.

WDE Support and Technical Assistance

State Title I Director

The State Title I Director will provide expertise, guidance, and resources related to Title I rules, regulations, and improvement planning. The State Title I Director will be involved in the entire planning process to answer questions and provide guidance. Coordination of LEA presentations to the WSBE will also be the responsibility of the State Title I Director.

Accreditation and Support Team

A member of the Accreditation and Support Team will assist in coordinating all and providing customer service to LEAs along with the WDE assigned representative. Each team member will work with districts and schools in various school improvement status levels, ensuring that the district and school are meeting state and federal requirements as well as ensuring the district and schools needs are being met.

Assigned Representative

Each school in School Improvement Year 4 – Planning for Restructuring will have a WDE assigned representative to assist in the restructuring effort. The WDE assigned representative will serve as the single point of contact for the district, provide support and assistance, and build a collaborative relationship for all involved. The WDE assigned representative will facilitate the collaboration between the WDE staff and the LEA. Essential duties of the WDE assigned representative include:

- Help the LEA determine the most appropriate approach to action planning;
- Act as the conduit to the WDE Accreditation and Support Team;
- Provide an external perspective to the LEA to review and provide input on school improvement efforts;
- Clarify restructuring plan requirements and processes; and
- Monitor planning meetings between the SLT, School Improvement Team, and/or WDE.

Wyoming State Board of Education Reports

A representative from the LEA SLT, principal and/or School Improvement Team will be required to present updates and plan progress to the Wyoming State Board of Education (WSBE) during their regularly scheduled board meetings throughout the year. The LEA may also be asked to provide further documentation or answer any questions that are requested by the WSBE. The following is a list of tentative timeframes and required information to be shared with the WSBE:

September	LEA/School Data Profiles and AYP Results
-----------	--

November	Timelines/Process for Plan Development
January	Preliminary Restructuring Plan with Research and Data for the Restructuring Option Selected
April	WDE Plan Approval
May/June	WSBE Plan Approval

Restructuring Plan Submission

The Restructuring Plan can be documented in several ways but must contain information describing the school improvement team selected, an overview of the restructuring option, and a description of the restructuring process and interventions that implement that option.

The Restructuring Plan can be submitted by:

- Using the provided checklist (see page 16) as the Restructuring Plan’s structure and uploading the document as an attachment to the WDE Assurance #28 section within ASSIST; or
- Providing information directly to the “Additional Information” narrative (under the “Executive Summary”). The plan’s narrative for the School Improvement Team and Restructuring Option sections would still be created using the provided checklist (see page 16). ASSIST’s “Goals Summary” could be used to document the plan’s Restructuring Process and Interventions section: the selected restructuring option would be included as an additional goal, the restructuring data and monitoring would be listed as measurable objectives, the description of the restructuring interventions would be included as strategies, and timelines would be documented as activities.

Restructuring Plan Approval

The proposed restructuring plan must be approved at three levels:

1. LEA – The LEA School Board and Superintendent must approve the plan and submit to the WDE Title I Director by April 1. If the LEA does not approve the plan, the School Improvement Team must be given their reasoning for not approving the plan and recommendations as to how the plan can be improved. The School Improvement Team must immediately meet, revise the plan, and have it ready to resubmit.
2. WDE – The WDE will convene a team to review the plan and then comment and/or solicit any changes, if needed. If the plan meets approval, the State Title I Director will recommend approval to the State Superintendent of Public Instruction on behalf of the WDE.
3. WSBE – Final approval by the SBE will occur during the May/June WSBE Meeting. The WSBE will review, comment and determine whether or not to approve the plan. If the

WSBE does not vote to approve the plan, the WSBE must give their reasoning for not approving the plan and recommendations as to how the LEA can improve the plan. The LEA must immediately meet, revise the plan, and have it ready to resubmit to the WSBE during their summer retreat in July or August for review.

To be approved at any level, the Restructuring Plan must “take intensive and far-reaching interventions to revamp completely the operation and governance of that school.” A Restructuring Plan that does not create a major reorganization of a school’s governance structure will not be considered.

SCHOOL IMPROVEMENT YEAR 5 – RESTRUCTURING (IMPLEMENTATION)

Plan Implementation

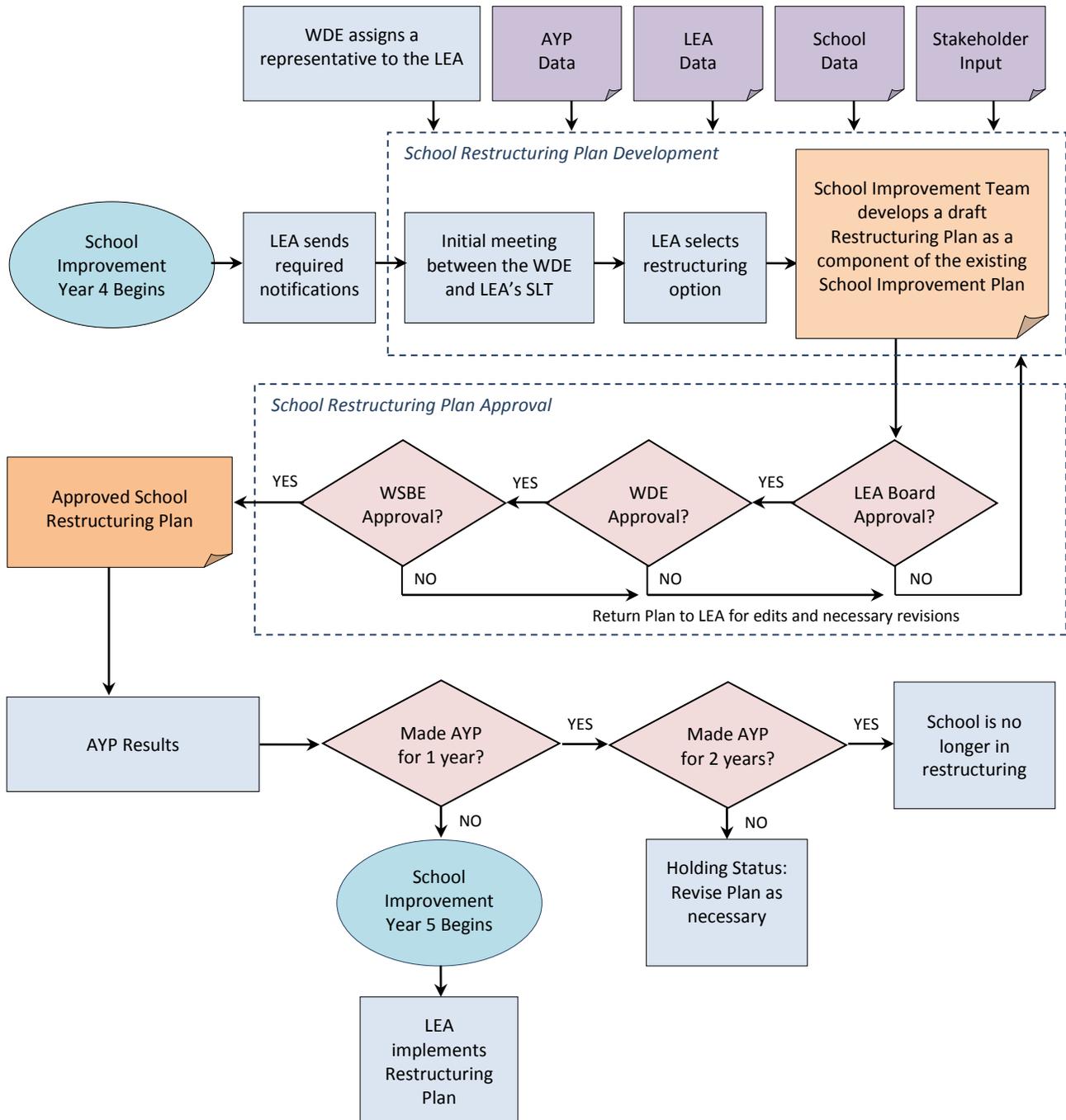
Once the WSBE approves the plan, implementation will begin before the first day of school the following school year when the school moves into School Improvement Year 5. The State Title I Director will require documentation that the plan is being implemented, will conduct monitoring visits, and help with modifications or revisions that might be needed. The WSBE may also request updates or presentations on plan implementation.

Holding Status

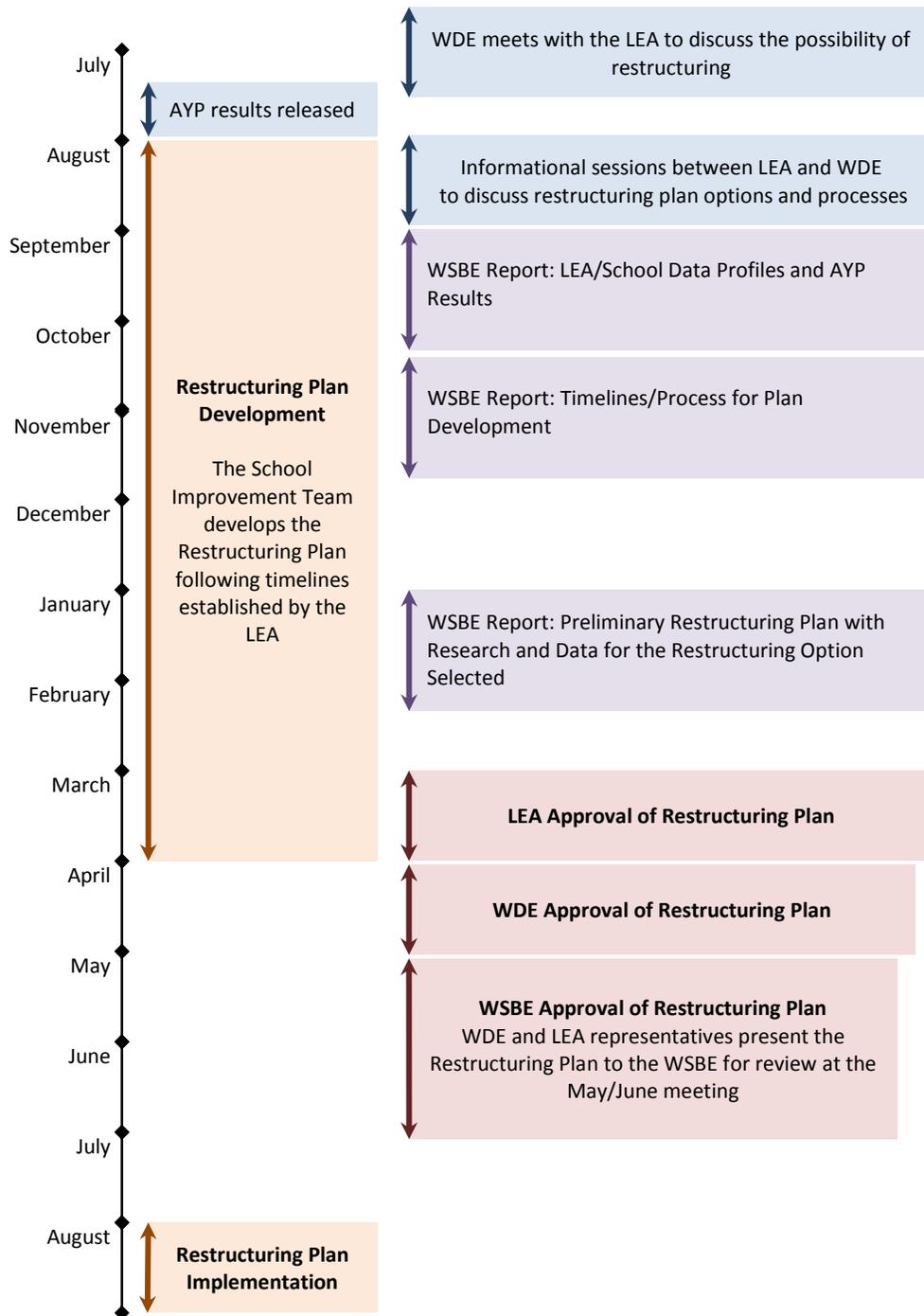
If the school meets AYP requirements at the end of School Improvement Year 4, it moves into “Holding Status” and plan implementation is not required. The plan will be reviewed and, if modified, the approval process must be again followed. The WSBE will be kept updated by the LEA on the status of the plan while the school is in “Holding Status.” If the school fails to meet AYP while in Holding Status, the plan must then be implemented the first day of the following school year when the school moves into School Improvement Year 5. If the school meets AYP requirements while in Holding Status, the school is no longer in Improvement status and the LEA does not have to implement the plan.

The LEA may decide to implement the plan while the school is in Holding Status. If this is done, the School Improvement Team may need to meet to modify or revise the plan during implementation, but no further plan development is needed, even if the school moves into School Improvement Year 5 Status – Restructuring Plan Implementation.

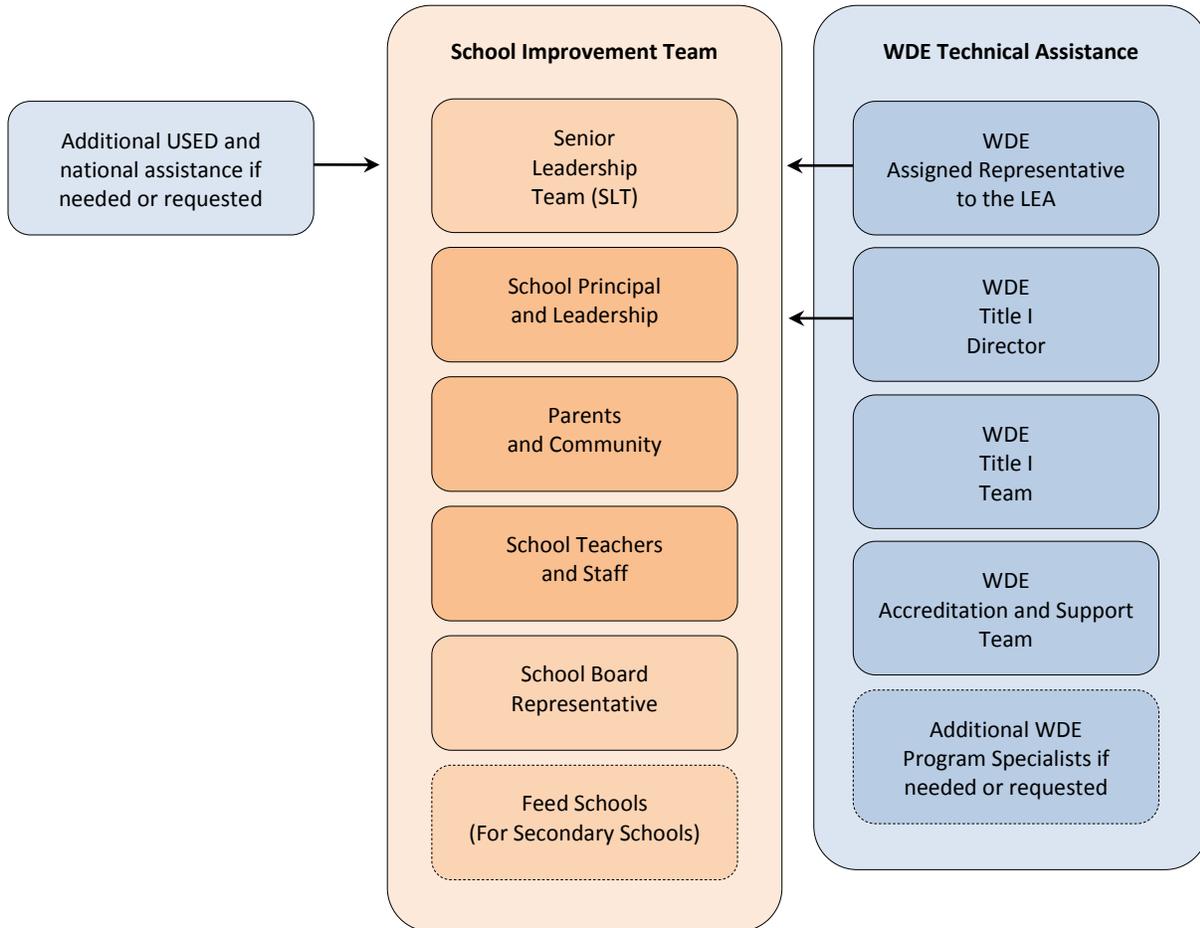
RESTRUCTURING PLANNING AND IMPLEMENTATION FLOWCHART



RESTRUCTURING PLANNING AND IMPLEMENTATION TIMELINE



SCHOOL IMPROVEMENT TEAM AND TECHNICAL ASSISTANCE



RESTRUCTURING PLAN CHECKLIST

School Improvement Team

School Improvement Team Members

- Does the plan identify the existing School Improvement team and additional members by name, position, and (if applicable) content area and/or grade level?
- Is one representative from the following groups included: Parents, School Staff and Teachers, School Principal and Leadership, LEA SLT Representative, School Board Member, and a WDE Representative?

Description of How Stakeholders were Involved in Restructuring Plan

- Does the plan provide a detailed explanation as to how additional stakeholders and required constituents will be involved in the Restructuring Planning process?
- How will the documentation (e.g. attendance/signature sheets, agendas, notifications) of stakeholder involvement be collected?

Restructuring Option

Proposed Restructuring Option(s) and Supporting Evidence

- Does the plan clearly identify which restructuring option will be selected:
 - OPTION 1 – Reopen as Charter School;
 - OPTION 2 – Replace the school or LEA staff members who are relevant to the failure to make Adequate Yearly Progress;
 - OPTION 3 – LEA contracts with private management to govern the school; or
 - OPTION 4 – Any other major restructuring of the school’s governance. For this option, be sure to add a description as to what the “other major restructuring” will be.
- Is a detailed rationale of this selection provided to ensure that fundamental reforms will occur to improve student academic achievement in the school and enable the school to make AYP?
- Does the explanation justify why this option would be the best solution for the school?
- Has supporting evidence (e.g. research, data, documentation) been provided to explain why this option is valid?

District Support of the Restructuring Plan

- How is the district supporting the restructuring plan?

- How is the LEA continuing the technical assistance provided to the school regarding the data analysis, identification and implementation of instructional strategies, and budget analysis?
- What systematic or district-wide improvement efforts are being implemented to support restructuring initiatives?

Support of School Improvement

- How will this plan support current School Improvement efforts within the school?
- How have the current school improvement activities been reviewed to determine if they are efficient and effective? If they are, how will they be integrated into this plan? If not, how has the school improvement process been revised and/or integrated into this plan?

Restructuring Process and Interventions

Restructuring Data and Monitoring

- What data will be used to monitor and measure the success of the restructuring efforts?
- What processes will be in place for the LEA to monitor the restructuring efforts?
- How will the LEA and school determine the effectiveness of the restructuring option and interventions? Reference any supporting research, documentation, or information.

Description of the Interventions for Restructuring

- Has a detailed description of the restructuring interventions been provided in the plan? The description should be written so that persons outside your LEA will understand your plan and reasoning without having existing knowledge of your LEA and school.
- Is it clear how these interventions support the implement the selected restructuring option? Reference any supporting research, documentation, or information.
- Which professional development activities have been selected? Give a detailed description as to what professional development activities will be needed to implement the Restructuring Plan. These activities need to provide staff with the knowledge and tools necessary to sustain the changes being made. One day or short-term workshops or conferences are expressly disallowed unless they are clearly part of a comprehensive professional development plan.

Timeline

- What are the major milestones or timelines for plan? Provide a detailed timeline for implementation that includes: each major milestone and key accomplishment; required school or LEA resource(s); anticipated completion date; and the primary contact.