



Ms. Patricia Searles
TIF Program Officer
U.S. Department of Education
400 Maryland Ave, SW
Washington, DC 20202-6200

PR Award # S374A120000

Dear Ms. Searles,

Aspire Public Schools is requesting a waiver of requirements established for the Teacher Incentive Fund (TIF) program, that (1) a local educational agency (LEA) develop and implement teacher and principal evaluation systems that are based in significant part on "student growth" as TIF rules define the term. Aspire Public Schools understands that TIF rules governing the grant in which the LEA is participating do not permit use of TIF funds for teachers' and principals' performance-based compensation unless teachers' and principals' performance is measured, in significant part, by student-growth as the term is defined in rules governing the grant competition. Aspire Public Schools understands that this waiver would apply only to student growth for principals and teachers of ESEA tested grades and subjects for school year 2015-16.

Under the applicable rules established for TIF, student growth means the change in student achievement for an individual student between two or more points in time. For the purposes of this definition, student achievement means – (a) for grades and subjects in which assessments are required under section 1111(b)(3) of ESEA (i.e., tested grades and subjects): (1) a student's score on such assessments and may include (2) other measures of student learning, such as those described in paragraph (b) of this definition, provided those measures are rigorous and comparable across schools within an LEA. (b) For grades and subjects in which assessments are not required under section 1111(b)(3) of ESEA: alternative measures of student learning and performance such as student results on pre-tests, end-of-course tests, and objective performance-based assessments; student learning objectives; student performance on English language proficiency assessments; and other measures of student achievement that are rigorous and comparable across schools within an LEA. Moreover, eligibility for TIF-funded performance-based compensation, and required LEA evaluations of educators, depends on use of student-growth as a significant factor in determining educator effectiveness.

This waiver would permit Aspire Public Schools, in accordance with criteria provided in more detail in the sections below, to assess the performance of teachers and principals affected by the TIF project on the basis of the approved alternative measures of student learning for teachers of tested grades and subjects and nontested teachers through schoolwide student growth measures.



I. Overview of Proposed Student Growth Measures in SY 2015-16

For SY 2015-16, four primary student growth assessments (STAR Enterprise, SBAC, ACT Aspire/ACT, and MAP) are proposed for assessing student growth in grades K-12 for use as a significant component of teacher and principal effectiveness ratings.

California Schools:

- In grades K-2, the **STAR Enterprise** assessment suite from Renaissance Learning will be administered to all students in Reading and Math to determine within-year classroom-level growth using a Student Growth Percentile (SGP).
- In grades 4th-8th, the **Smarter Balanced Assessment Consortium (SBAC) assessment** will be administered in available English and Math to determine year-to-year growth using SGPs. Aspire will partner with the California CORE Data Collaborative to generate classroom and school level growth scores using CORE's statistically large norm group.
- In grades 9th-11th, the **ACT Aspire and ACT assessments** will be utilized to measure within year growth in Math, English, Writing, and Science using a proprietary growth model from ACT (demographically-matched virtual control groups).
- **Teachers whose content is directly measured** by either STAR Enterprise, SBAC, or ACT/ACT Aspire will receive an Individual Student Growth Score based on their students' performance. Approximately 75% of Aspire teachers fall into this category.
- **Teachers in nontested subjects** will receive a Schoolwide Student Growth Score that represents a student-weighted average of all student growth assessments taken in the school. Teachers considered "nontested" generally include teachers in traditionally untested subjects (Fine Arts and Music, Physical Education, World Languages), Education Specialists, Intervention Specialists, and any other teacher for whom a subject or grade level student growth assessment is not available. Approximately 25% of Aspire teachers fall into this category.
- In deference to the documented instability of year-to-year student growth metrics, teachers will have the option (when available) of using their approved student growth score from SY 2015-16 or SY 2014-15, whichever is higher. New teachers in SY 2015-16 will be limited to their current year growth scores.
- In all cases, the individual student growth component will account for 20% of teachers' overall effectiveness rating, with an additional 10% derived from a school-wide growth component.
- In all cases, **principals** will receive the Schoolwide Student Growth Score, a student-weighted average of all student growth assessments taken in the school. This Schoolwide Student Growth Score will count for 30% of their overall principal effectiveness rating in SY 2015-16. Principals will only draw from their current year Schoolwide Student Growth Score (unlike teacher, they cannot "choose") from the higher of two years.



Tennessee Schools:

- In all grades, NWEA's Measures of Academic Progress (MAP) assessment will be used to measure student growth in all grades Kinder-7th in Math, Reading, and Science. The Individual Growth Score for each classroom teacher will be calculated based on the percentage of students meeting their pre-established "expected growth" on MAP assessments.
- **Teachers whose content is directly measured** by either STAR Enterprise, SBAC, or ACT/ACT Aspire will receive an Individual Student Growth Score based on their students' performance.
- **Teachers in nontested subjects** will receive a Schoolwide Student Growth Score that represents a student-weighted average of all student growth assessments taken in the school.
- In all cases, the individual student growth component will account for 20% of teachers' overall effectiveness rating, with an additional 10% derived from a school-wide growth component.
- In all cases, **principals** will receive the Schoolwide Student Growth Score, a student-weighted average of all student growth assessments taken in the school. This Schoolwide Student Growth Score will count for 30% of their overall principal effectiveness rating in SY 2015-16. Principals will only draw from their current year Schoolwide Student Growth Score (unlike teacher, they cannot "choose") from the higher of two years.
- **Please note:** Aspire previously planned to use Tennessee Value-Added Assessment System (TVAAS) growth scores as part of Individual Growth Scores for teachers in grades 4th-7th. However, with the abrupt cancellation of the TNReady assessments in April 2016, TVAAS scores were unavailable for use in effectiveness calculations.

Definitions

For the purposes of this waiver request, the following terms are defined as follows.

- **Individual Student Growth Score:** the median student growth score taken from all content-aligned assessments given within a classroom during the academic year. Individual Student Growth Scores are most often given to self-contained classroom teachers who administer student growth assessments in multiple subject areas (ie. ELA and Math CSTs), or core subject teachers who administer student growth assessments in their subject area.
- **Schoolwide Student Growth Score:** the median student growth score derived from all assessments taken in a given school during the academic year, either as within-year growth measures or based on "spring-to-spring" growth. In the case that the student growth scores within a school are generated using different baseline assessments that require differentiated effectiveness cut points (ie. STAR Enterprise and SBAC), the Schoolwide Student Growth Score will be calculated by taking either the median *effectiveness designation* within a school or a *weighted-average* of the student growth scores from each assessment.
- **STAR Enterprise:** a nationally normed, adaptive assessment suite developed by Renaissance Learning and administered to all Aspire students in Kinder-3rd grade during SY 2015-16 and all students at elementary K-5/K-8 campuses in SY 2014-15. Available assessments within the STAR Enterprise suite include STAR Early Literacy (Kinder-3rd), STAR Reading (1st-8th), and STAR Math



(1st-8th). Within-year SGPs will be derived from STAR Enterprise assessments as a basis for student growth calculations in SY 2015-16.

- **SBAC:** A nationally-normed, computer adaptive assessment developed by the Smarter Balance Assessment Consortium to measure student proficiency on the Common Core State Standards in English and Math in grades 3rd-8th and 11th. Because of a lack of effective “priors”, Aspire is only able to generate statistically “valid” student growth scores on SBAC in grades 4th-8th.
- **ACT Aspire:** a vertically-integrated college readiness measure developed by ACT. ACT Aspire offers subject area assessments in Reading, Writing, English, Math, and Science, varying subsets of which will be administered at California secondary campuses in grades 9th-10th. Year-to-year growth scores will be derived from ACT Aspire assessments as a basis for student growth calculations at the end of SY 2015-16.
- **ACT:** a college entrance examination and college readiness measure widely used throughout the United States. ACT assesses Reading, Writing, English, Math, and Science, and will be administered to all 11th graders as a year-to-year growth measure in SY 2015-16 .
- **MAP:** A vertically-aligned, computer-adaptive, nationally-normed assessment of Reading and Math in grades 2nd-12th. Aspire Public Schools participates in MAP as part of its membership in the Achievement School District.

II. Student Growth in SY 2015-16 by Grade and Subject

The tables below outline the student growth measure options to be offered to Aspire teachers by grade and subject area. Two student growth options are available to all teachers (except new teachers), one from SY 2015-16 and one from SY 2014-15. Teachers are given the option of taking the higher of the last two years of student growth data to ameliorate the documented statistical instability of value-added student growth models.

California Schools				
	Group	Student Growth Options		
			1	2
Elementary	Kinder-3 rd Self-contained	Veteran	15-16 STAR Ren	14-15 STAR Ren
		New	15-16 STAR Ren	
	4 th -6 th Self-contained	Veteran	15-16 SBAC	14-15 STAR Ren
		New	15-16 SBAC	
	Specials/Electives	Veteran	15-16 Schoolwide	14-15 Schoolwide
		New	15-16 Schoolwide	
	K-5 Science	Veteran	15-16 Schoolwide	14-15 Schoolwide
		New	15-16 Schoolwide	
Middle School	6 th -8 th ELA and Math	Veteran	15-16 SBAC	14-15 ACT Aspire
		New	15-16 SBAC	
	6 th -8 th Science	Veteran	15-16 Schoolwide	14-15 ACT Aspire
		New	15-16 Schoolwide	
	6 th -8 th Specials/Electives or other “Untested”	Veteran	15-16 Schoolwide	14-15 Schoolwide
		New	15-16 Schoolwide	



High School	9 th and 10 th ELA and Math	Veteran	15-16 ACT Aspire	14-15 ACT Aspire
		New	15-16 ACT Aspire	
	9 th – 11 th Science	Veteran	15-16 Schoolwide	14-15 ACT/ACT Aspire
		New	15-16 Schoolwide	
	11 th ELA & Math	Veteran	15-16 ACT	14-15 ACT
		New	15-16 ACT	
	9 th -11 th History/Econ/Gov	Veteran	15-16 Schoolwide SGP	14-15 Schoolwide SGP
		New	15-16 Schoolwide SGP	
	-Electives -12 th Grade Only Teachers	Veteran	15-16 Schoolwide SGP	14-15 Schoolwide SGP
		New	15-16 Schoolwide SGP	

Tennessee Schools				
	Group		Student Growth Options	
			1	2
Kinder-7th	Kinder-3 rd	Veteran	15-16 MAP	14-15 MAP
		New	15-16 MAP	
	4 th -7 th Self-contained or ELA/Math Cored	Veteran	15-16 MAP or 15-16 TVAAS (highest taken)*	14-15 MAP or 14-15 TVAAS (highest taken)
		New	15-16 MAP or 15-16 TVAAS (highest taken)*	
	Science (Single Subject)	Veteran	15-16 Schoolwide [^] or 15-16 TVAAS (highest taken)*	14-15 MAP or 14-15 TVAAS (highest taken)
		New	15-16 Schoolwide [^] or 15-16 TVAAS (highest taken)*	
	Specials/Electives	Veteran	15-16 Subject Area Growth Measure or 15-16 Schoolwide	14-15 Subject Area Growth Measure or 14-15 Schoolwide
		New	15-16 Subject Area Growth Measure or 15-16 Schoolwide	

*TVAAS not available due to cancellation of TNReady assessment program in 15-16. For more information, please see the "Student Growth without TNReady FAQ April 2016" on MyAspire.

[^]The MAP Science assessment was discontinued in 15-16 – Aspire TN science teachers (single subject) will take the Schoolwide growth score instead in the absence of TVAAS.



III. Anticipated Impact on Budgets

The table below summarizes the total licensing costs associated with the proposed student growth assessment program in SY 2015-16 as described above. All costs below are covered under previous estimates of student growth assessments costs and no requested changes to budget line items are anticipated.

2015-16 Costs	
STAR Enterprise	\$60,000
SBAC (CA CORE Data Collaborative membership to generate growth scores)	\$34,974
ACT Aspire	\$45,000

IV. Communication Strategy

The proposed changes to student growth measures used in effectiveness ratings will be communicated to teachers through both digital and in-person methods. These methods and the related purpose of each are outlined in the table below.

Communication Method	Timing/Frequency	Purpose
Ongoing presentations to advisory panels comprised of representatives from both schools and educators sub-groups (General Education teachers, Education Specialists, etc).	<ul style="list-style-type: none"> Quarterly (4x) over the course of SY 2015-16. 	<ul style="list-style-type: none"> Ongoing update and feedback process with representatives from schools and teacher subgroups
Targeted email communication to teachers and principals, including: <ul style="list-style-type: none"> Orientation videos Internal website pages Training documents Surveys soliciting teacher feedback. 	<ul style="list-style-type: none"> May 2015 (Initial student growth proposal and feedback survey) August 2015 (Webinar orientation and training 30 days prior to start of fall testing) 	<ul style="list-style-type: none"> Review teacher feedback from May 2015 surveys and review updated student growth assessment model for SY 2015-16 Communicate testing logistics and support frameworks Gather post-implementation feedback



	<ul style="list-style-type: none"> October 2015 (Post-fall implementation survey) 	
Updates to the Aspire Teacher Effectiveness Guidebook, available on Aspire internal intranet system.	<ul style="list-style-type: none"> July 2015 	<ul style="list-style-type: none"> Formal adoption of revised student growth measures for SY 2015-16
Annual presentations to school staff from members of Aspire’s Teacher Effectiveness and Senior Leadership Team during TED site visits	<ul style="list-style-type: none"> Annual 	<ul style="list-style-type: none"> Formalized, in person feedback process, including real-time voting and post-visit teacher and principal surveys
Orientation and training for teachers during Leadership Retreats and Teacher Leadership convenings, both regionally and at the Aspire Home Office.	<ul style="list-style-type: none"> At least once 1x during summer Leadership Retreat and 2x during within-year Leadership Retreats 	<ul style="list-style-type: none"> Capacity building at the school/team level related to test administration and data analysis.

V. Technological Support

The table below summarizes the Aspire teams that will support the implementation of proposed student growth measures in SY 2015-16

Team	Supports to be Delivered
Data and Assessment	<ul style="list-style-type: none"> Vendor communication, student N-counts, and assessment ordering by campus In-person and remote training of testing coordinators In-person training of principals, lead teachers, and Data Drivers related to testing logistics Remote training of teachers related to testing logistics and score interpretation Creation and publishing of assessment training guides provided to teachers and posted on internal Aspire website Technical support related to teacher and student assessment credentials for test administration and report access Assessment window creation and monitoring Teacher and principal facing dashboard creation for score analysis and

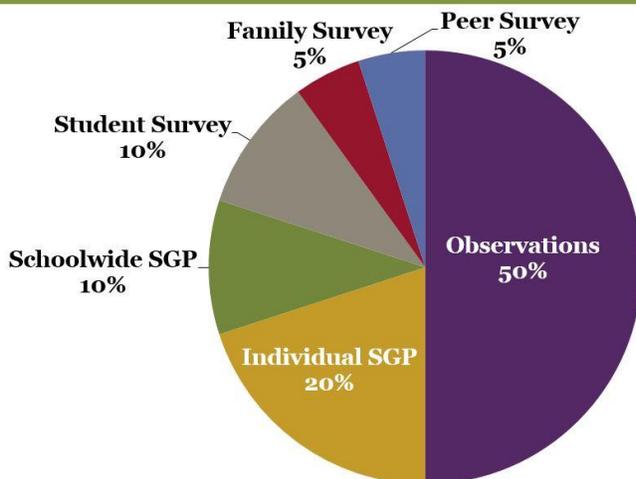


Technology Operations	<ul style="list-style-type: none"> • Device inventories and procurement by school site (computer-based assessments) • Bandwidth and access point inventories by classroom within sites, with upgrades delivered as needed • Designated regional technology support managers by region • Student roster management through student information system (PowerSchool) and data integration between assessment vendors and internal data warehouse
Special Education	<ul style="list-style-type: none"> • Delivery of IEP-specified accommodations/modifications during assessment windows • Documentation of accommodations/modifications rendered and communicated to Data and Assessment/Teacher Effectiveness teams for use in SGP determinations
Teacher Effectiveness	<ul style="list-style-type: none"> • Communication of assessment rationale, logistics, and implications for student growth ratings to teachers through: <ul style="list-style-type: none"> ○ Site-based “Town Halls” ○ Periodic webinars, both grade level and assessment specific ○ Updates to Aspire Teacher Effectiveness Guidebook ○ Tutorials housed on internal Aspire website. • Ongoing solicitation of teacher feedback through Town Halls, surveys, and Teacher Effectiveness Driver advisory panels. • Coordination with vendors and SGP calculations and determination of Individual and School-wide SGP ratings for use in overall effectiveness scores based on approved student growth measures • Determination of overall effectiveness ratings and coordination with Finance and Human Resources teams for ratings-related salary and tenure outcomes

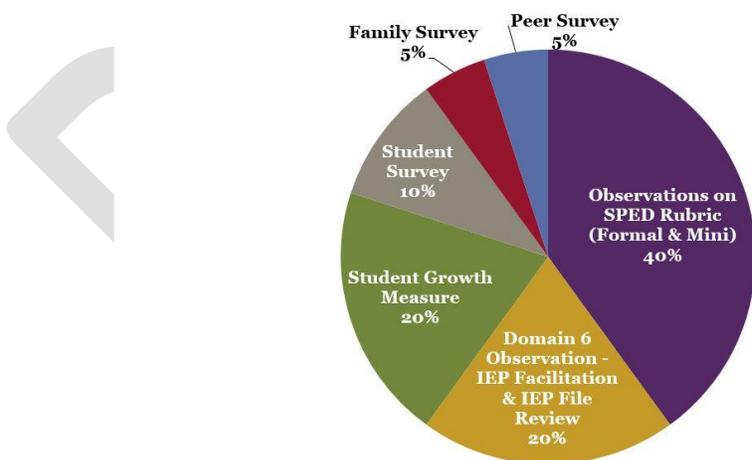
VI. Effectiveness “Pies” for Teachers, Education Specialists, and Principals

The tables below summarize the proposed effectiveness pies for all educators impacted by the proposed changes to student growth calculations in SY 2015-16.

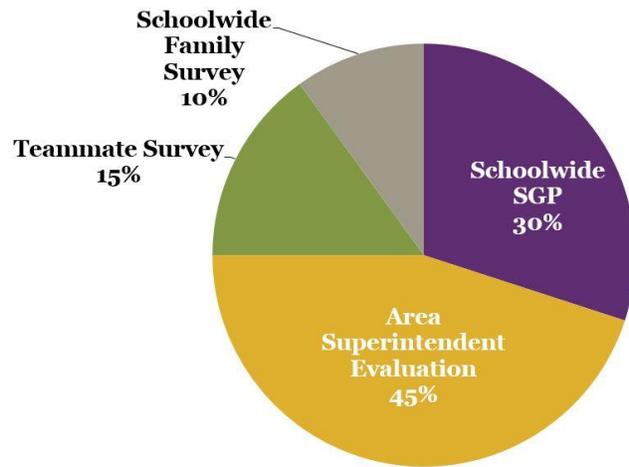
Teacher Pie (2015-2016)



Education Specialist Pie (2015-2016)



Principal Pie (2015-2016)



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VII. Further Considerations and Conclusion

Aspire Public Schools believes that affording this flexibility in the definition of student growth will allow principals and teachers to continue to participate in the established evaluation system as well as continue to be eligible to receive compensation for effectiveness, through incentives and/or placement into career ladder positions, ensuring Aspire Public Schools continues implementing its TIF project as closely to the aligned application and TIF rules as possible.

This waiver request will not adversely impact any measurable goals for this program for the SY 2015-16 since teachers will still be evaluated using student growth and an educator's performance will still be differentiated consistent with this waiver request.

The approval of this waiver will further the overall goals of the program by allowing for a payout to the teachers who have demonstrated effectiveness. Moreover, Aspire Public Schools will have met its promised commitment to these teachers who have achieved effective ratings and teachers will be motivated to continue to participate in professional development based on their evaluation scores. Additionally, this allows for a clear transition for teachers and schools to the Common Core curriculum and the State's request for a testing transition period.

If granted a waiver of the student growth definition for tested grades and subjects, Aspire Public Schools assures it will:

- Use growth measures for SY 2015-16 that:
 - Meets, for all teachers and principals, the definition of student growth for grades and subjects in which assessments are not required under section 11119(b)(3) of ESEA.
- Develop and implement a technical assistance plan and a communication plan that outline how Aspire Public Schools will support teachers and principals in implementing new student growth measures and how these growth measures may differ from previous state assessments.

Prior to submitting this waiver request, Aspire Public Schools assures it has:

- Consulted with its teachers and principals on this change to its system of evaluating their performance, and received support for this change; and
- Aspire Public Schools has also provided notice and information regarding this waiver request to the public in the manner in which Aspire Public Schools customarily provides such notice and information to the public, by posting this proposal on our website. No comments were received, but any comment received in the future will be addressed, as appropriate.



Sincerely,

Carolyn Hack
Chief Executive Officer

Attachments:
Copy of Website Notification for Public Comment

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