



STATE OF SOUTH CAROLINA DEPARTMENT OF EDUCATION

Mick Zais
Superintendent

1429 Senate Street
Columbia, South Carolina 29201

March 17, 2014

VIA ELECTRONIC MAIL

The Honorable Arne Duncan
United States Secretary of Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: South Carolina's Request for ESEA Flexibility Extension

Dear Secretary Duncan:

I am writing to request a one-year extension of South Carolina's Elementary and Secondary Education Act (ESEA) flexibility, so that South Carolina can continue to implement ESEA flexibility through the end of the 2014–15 school year.

South Carolina seeks to extend its ESEA flexibility through the end of the 2014–15 school year because the implementation has raised expectations and student achievement. It is in the public interest for us to continue our progress under the waiver rather than revert to the standards and accountability measures mandated by the most recently reauthorized ESEA (i.e., the No Child Left Behind (NCLB) Act of 2001). Under ESEA flexibility, South Carolina has initiated new standards that are college and career ready, revised its accountability system, and is implementing an enhanced system for evaluating teachers and principals.

South Carolina's revised accountability system is more easily understood by district and school administrators, parents, and the public. The new A–F grading scale allows for a more accurate identification of school performance, because the grading system incorporates all subgroups and subjects into an overall grade. Ranking schools this way allows the state to truly identify the lowest performing schools that are missing annual objectives as "Priority Schools" and schools with the most significant achievement gaps as "Focus Schools." The previous accountability method mandated by NCLB over-identified schools. It did not provide a clear illustration of performance, because schools were identified in the same manner regardless of the number of objectives they did not meet.

The revised accountability system is a more efficient and accurate identification of low-performing schools that allows the State and individual school districts to better target resources

to schools with the most need. For example, ESEA flexibility allows school districts to better determine how to use these resources in coordination with other federal funds allocated to the school district. School districts are allowed to use funds to offer public school choice and Supplemental Educational Services where parents choose to use these services. Under the waiver, school districts are no longer required to sequester 20 percent of their Title I allocation where these services are not being requested. This allows school districts to redirect these funds to locally developed programs and to identify “Priority” and “Focus” Schools.

South Carolina’s ESEA flexibility has increased expectations for college and career readiness because the new standards address specific skills that were not in the 2008 South Carolina English Language Arts (ELA) Standards, including *speaking and listening* and *evidence-based reasoning and writing*. Skills such as listening carefully to ideas; integrating information from oral, visual, quantitative and media sources; evaluating what students hear; and using media and visual displays to enhance communication are addressed in the new standards. Students as early as kindergarten will be introduced to these skills.

The new standards also embed *research* and exposure to *complex texts* across content areas in a manner that our state’s 2008 ELA standards do not address. Reverting back to the 2008 SC ELA standards would eliminate the exposure to *complex texts* as an important focus in K–12 schools.

Under ESEA flexibility, South Carolina’s Educator Evaluation System directly ties a *principal’s effectiveness score to the achievement level of his or her students* (Value Added). Value-add will be 50 percent of a principal’s overall evaluation, which will establish a clearer level of a principal’s effectiveness. Combined with the revised rating language of the principal performance standards that now identify five levels of competency versus three, these assessments ensure that a more accurate sense of a principal’s or school’s effectiveness is *communicated to the public*.

In addition, the Educator Evaluation System includes new measures of teacher performance and student growth. Within this system, teacher performance is calculated through a new educator observation rubric that is used with all classroom-based teachers. The rubric contains four performance standards (PS) or domains (Planning, Instruction, Environment, and Professionalism) that are aligned with the 2011 InTASC Model Core Teaching Standards. These domains increase the utility of the standards by making them fewer, deeper, and clearer and ensure *teachers’ performance standards are aligned with the students’ college- and career-readiness standards*.

A *focus on student growth as opposed to achievement* represents a positive shift in South Carolina’s educational system. Student growth is calculated in one of two ways: teachers who teach subjects and grades that have state-level assessments will receive “*Classroom Value-Added (CVA)*” scores and teachers in non-tested grades and subjects will measure student growth with locally determined “*Student Learning Objectives (SLOs)*.” Within *CVA*, we are proposing that South Carolina use a three-year rolling average to calculate teachers’ *CVA* scores. Calculations for the three-year rolling average will begin with the 2014–15 school year. The use of a three-year rolling average will allow our districts to begin making personnel decisions using student

growth data following the 2016–17 school year. We are considering this model because it is able to measure student growth from the beginning of the school year to the end of the year, while accounting for variables that are outside a teacher’s control (e.g., socioeconomic status, parental involvement, prior knowledge). Furthermore, value-added calculations account for inherent challenges in student testing such as missing data and measurement error, making them more reliable than a measure of achievement at a single point in time.

Teachers in non-testing grades will have *SLOs*, academic goals the educator sets for his or her students at the start of a course. It represents the growth in learning an educator expects to see over the course of one academic year. The goals must be specific and measurable, based on available prior student learning data. Educators’ scores are based upon the degree to which the goals were attained, as evidenced by student academic performance at the end of the course. Currently, we are working with two external educational research organizations, SEDL and the American Institutes for Research (AIR), to better prepare our districts for implementation of SLOs. SLOs are the most labor-intensive component of our evaluation system.

Finally, the change in focus to measure the extent of growth in student learning instead of just achievement of absolute goals will allow more accurate tracking of progress and reward teachers for working with struggling students.

In advance of requesting this extension, South Carolina continued to meaningfully engage and solicit input on the implementation of ESEA flexibility. From October 2013 through January 2014, staff of the South Carolina Department of Education participated on the meeting agendas of more than 25 stakeholder groups and conducted a state-wide virtual meeting on December 10, 2013. Additionally, South Carolina had a public comment period regarding ESEA flexibility from December 13, 2013, through January 30, 2014.

As part of the extension process, South Carolina proposes two substantive changes to Principle 2 and Principle 3 of our currently approved ESEA flexibility request. Attached please find the following documents:

- (1) a completed amendment request template, reflecting the necessary consultation of stakeholders and describing two substantive amendments that South Carolina is making to its approved request; and
- (2) a redlined version of South Carolina’s currently approved ESEA flexibility request reflecting all proposed changes.

Please note that in addition to the items proposed in the attached amendment request template, South Carolina submitted proposed amendments to Principle 2 on September 30, 2013 (updated on December 23, 2013, and February 21, 2014), which are currently pending. These amendments are reflected in the redline document.

Also, South Carolina has previously addressed the “next steps” conditions in our ESEA flexibility Part B monitoring report: revising the methodology for calculating school accountability ratings so that it appropriately includes students with disabilities who take alternate assessments and publishing report cards that meet ESEA or ESEA flexibility

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requirements. We addressed these conditions in the pending amendments to Principle 2 (accountability ratings) referenced previously and in a letter dated February 26, 2014, to Monique Chism, Ph.D. (report card) at the U.S. Department of Education.

I understand that these documents will be reviewed to ensure that they comply with the principles and timelines of ESEA flexibility.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in blue ink that reads "Mick Zais". The signature is written in a cursive style with a long horizontal flourish extending to the left.

Mick Zais, Ph.D.
State Superintendent of Education

MZ/kmh

Attachments

- (1) Completed amendment request template
- (2) Red-lined version of ESEA flexibility request

c: Elizabeth Ann Witt, Ph.D., Team Leader, U.S. Department of Education
Karla Hawkins, Deputy General Counsel, S.C. Department of Education