



LEA Comments

State of Missouri

Chris L. Nicastro, Commissioner
Missouri Dept. of Elementary and Secondary Education
205 Jefferson Street, PO Box 480
Jefferson City, MO 65712

RE: No Child Left Behind Waiver

I believe the 17 points regarding the failures of NCLB, made by Jamie McKenzie in 2006, listed below ring even truer today than when they were written.

1. Disappointing Results

The chief indicators of educational progress in the land - the NAEP Tests (National Assessment of Educational Progress) have remained stagnant since NAEP's heavy handed policies went into practice in 2002. Considering the claims made, the results are "full of sound and fury signifying nothing."

2. Failing Schools

One of NCLB's main effects has been the labeling of thousands of schools as failures even though some of those schools have made admirable progress under trying circumstances and have been judged favorably under state standards. The burden of these failures and the shaming strategy has fallen most heavily on the very children and neighborhoods NCLB was claimed to assist.

3. Lack of Quality Teachers

Although NCLB requires that all states fill all classrooms with qualified teachers, no state has met that standard yet according to a report issued by the Ed. Department:

At times it seems the architects of NCLB were engaged in wishful thinking, believing that proclamation and accomplishment were one and the same. As is all too often true of zealots, the very strength of their convictions can blind them to crucial realities. Given the national shortage of qualified teachers, it is hardly surprising that it is difficult to find teachers willing to work under difficult conditions. Once again, it is the poor and disadvantaged populations who end up suffering most from this NCLB failure.

4. Lowering of Standards

NCLB has made shame and punishment such a condition of life for schools that many states have been "gaming the system" by adopting easier tests and lowering standards. They create the false impression of educational progress - one unsubstantiated by testing of their students on a demanding set of tests such as NAEP.

5. Narrowing of Curriculum

Because NCLB initially looks at just the reading and math scores of schools, schools at risk have taken to handing out double doses of math and reading while eliminating other types of learning that go untested and seem little valued. The notion of "the whole child" has been sacrificed as time previously devoted to social studies, science, art and music is often switched over to the basic skills.

6. Ignoring of Children

In direct conflict with NCLB's professed goals, Ed Department officials conspired with some state officials to allow unconscionably large group sizes to apply before a sub category of student might be counted in judging AYP. Those states that set high numbers thereby allowed their affluent and suburban schools to ignore the plight of their disadvantaged and minority students. According to a story from the AP, nearly two million minority students went uncounted because of this collusion.

7. Fear, Shame and Threats

NCLB is quick to label schools and programs as failures when subgroups do not make AYP. Once labelled, a school may suffer extreme punishments as children and families are allowed to transfer elsewhere and the school staff may be shifted around or fired. While conservatives have been unable to put into place their dream of privatization, lurking behind the blame and shame is the hope that failing the public schools will set the stage for a free market approach.

8. Bad Tests

The sudden national obsession with high stakes testing combined with the Ed Department's curious insistence upon annual testing has led to a dilution of test quality as states have opted for easy and inexpensive tests that measure less challenging aspects of performance and as testing companies have found their product development resources severely strained.

9. Fake Results

NCLB has created enormous pressure to achieve the appearance of progress but has done nothing to guard against educational fraud so that schools and states have engaged in an array of practices that range from actual cheating to gaming the system in ways that make students appear more proficient than they really are.

10. Educational Triage

In many schools, NCLB has created so much pressure for rising test scores that staff will focus efforts on a special segment of students closest to the passing line while abandoning those at the top and the bottom.

11. Factory Style Learning

Children are not hamburger patties passing through a factory style assembly line, being cooked and flipped and slathered with sauce, but the prevalent mode of instruction built into many of the so-called approved learning programs emphasizes heavily scripted, mind-numbing kinds of learning activities.

12. Loss of Best Teachers

In one of the great uncovered news stories of this decade, tens of thousands of good teachers are dropping out or retiring early to avoid the demoralizing impact of NCLB/Helter-Skelter. A decade of teacher and school bashing creates serious morale problems when combined with the standardization of teaching methods that effectively de-skills teachers and treats them like factory operatives rather than professional decision-makers. They go quietly into the good night while the press covers other stories. It is tragic, their loss, but it goes unmentioned and unnoticed.

13. Loss of Future Teachers

In a related uncovered news story, tens of thousands of potential teachers are shifting career goals to other professions as they hear horror stories emerging from schools across the land. Instead of encouraging and recruiting new teachers by making the teaching profession seem desirable and highly regarded, the architects of NCLB have done the opposite, treating teachers with disdain and blaming all our educational problems on them. The loss to the nation is tragic but again, they go quietly into the good night while the press covers other stories. It is tragic, their loss, but it goes unmentioned and unnoticed.

14. Loss of Morale

With its emphasis on simple-minded threats, punishments and accountability, it is apparent that the architects of NCLB cared very little about its impact on teacher morale, and there is little being done to improve it. Unfortunately, NCLB is doing great damage to morale, as evidenced by various surveys of teacher attitude.

Ironically, teacher morale is so discounted at this stage of educational history that the strongest research on teacher retention was conducted in the previous decade and century. There have been so few studies of teacher morale and retention in this century, that one might suppose it were no longer an issue. But failure to collect data is just a close ally of denial (or concealment). The government chooses to shine the spotlight on those aspects of life that fit the current agenda and ignore aspects and data that might reflect badly on that agenda.

15. Drop Outs and Push Outs

The pressure to create good scores also rewards schools that can shove students out the door. Weak students make schools look bad. Scores go up when weak students drop out of school. NCLB should be renamed "No Child Left in School."

16. Reduction In Time for Learning

It stands to reason that improvements in learning are related to time on task. Sadly, NCLB distracts teachers and students from their real work as teaching to tests becomes an obsession and a priority. Test preparation displaces instruction. Students spend less time learning and less time improving. Billed as reform, NCLB is actually retreat.

17. Stagnation

In most respects, educational progress has ceased during this NCLB era. Rather than extension, amplification and enhancement, this decade has been characterized by retrenchment and retreat. The best thinking and the best thinkers have been ignored. These are educational Dark Ages.

In a decade offering exciting social and economic prospects, NCLB has locked American schools in an Iron Maiden or chastity belt. At the very time we should be exploring human potential, we have lowered standards, killed innovation, stifled creativity and lost ground. The best thinkers and best thoughts have been stilled while the merchants of mediocrity have been given the stage and the joystick. The wrong people are calling the shots.

The underfunded mandate of No Child Left Behind has done a disservice to Missouri's students, teachers, and school districts since its inception. In the absence of a total repeal of No Child Left Behind, I believe it is time for Missouri to petition a waiver of the unattainable and demoralizing goals of this legislation and return some autonomy to Missouri educators.

Yours respectfully,

Paula Champion
208 Highway 174
Mount Vernon, MO

Katnik, Paul

From: Susan Barnes [sbarnes@seneca.k12.mo.us]
Sent: Tuesday, December 06, 2011 12:48 PM
To: ESEA Waiver
Subject: feedback

I do not understand why DESE would want to replace the support that we now receive from the RPDC. My school district has developed a relationship with our RPDC specialists which is important because it gives credibility for their expertise to the teachers. Just "retraining" other individuals does not an expert make.

Susan K. Barnes
Elementary Principal
Seneca Elementary School

"Small Smart Choices + Consistency + Time = Radical Difference" *Darren Hardy*

Katnik, Paul

From: Bowen, Wayne H [wbowen@semo.edu]
Sent: Wednesday, December 07, 2011 8:13 AM
To: ESEA Waiver
Subject: Missouri waiver request

Does Missouri's waiver request include expanded public school choice? What impact will this request have on that ongoing component of NCLB?

Thanks,

Wayne H. Bowen, Ph.D.
Professor and Chair
Department of History
Southeast Missouri State University
(573)-651-2179

Katnik, Paul

From: Mary Livingston [livimar@deltarv.k12.mo.us]
Sent: Wednesday, December 07, 2011 10:01 AM
To: ESEA Waiver
Subject: waiver

I am in favor of requesting a waiver from NCLB that is more suitable to our state and its needs. Small districts, such as mine, find it hard to meet the required percentages due to high numbers of transitional students and the lack of student preparation when they enter kindergarten.

Mary Livingston

Katnik, Paul

From: Cathrine Pratt [mccmdogkennel@gmail.com]
Sent: Wednesday, December 07, 2011 10:05 PM
To: ESEA Waiver
Subject: My child left behind

My son at 17 yrs old reads on 4th grade level now. The head of the I.E.P told me" teachers has to teach according to the law weather your child understands or comprehends it is not are problem". The teachers teach if your children gets it good if not that's not are problem. That's what Gina Adams in the Mansfield Missouri school told is. Sherry Lagares who is with re-max came an help with my son fight the school to teach him in 2007.they told us he was mental retarded an he was tested an is dyslexic. They said that wasn't in their criteria to chose that several kids maybe dyslexia but are job is to teach to are best ability if they understand it then good an for the ones that don't. They will pass anyway. Don't let the schools skip over them teach them to understand. PLEASE keep the no child left behind an make sure they will learn to read an right.thanks Cathrine pratt

Katnik, Paul

From: Kay Tetley [ktetley@centurytel.net]
Sent: Sunday, December 11, 2011 8:11 PM
To: ESEA Waiver
Subject: No Child Left Behind Waiver

I am in favor of the Waiver for the No Child Left Behind Law.

To me, this law has always been idealistic, not realistic. Especially since states would be punished if they did not show progress in the proficiency of math and reading skills. Some children cannot progress to the desired proficiency because they are not capable. All my friends are retired teachers, and I spoke to them regarding this law when it originated. They scoffed at me and told me it was wonderful!

Every child has an ability to do something well, but it is an effort sometimes to find that aptitude. Children should be encouraged to be exposed to other fields of learning, not only math and reading. These are super important, I give you, but some children just cannot do them well. For instance, the field of music has always been encouraged in my family of five boys because it is relaxing to the mind, leads to creativity, and soothes the soul. Art also serves the same purpose, as does history. (I wish the History Channel had been available when I was in school!) I love reading - I keep a stack of books by my chair at all times - but two of my boys have never been good readers and still aren't. But they have been exposed to all subjects, and I hope they are better people because of that.

Then there are some students who do not do well academically, but can take a machine apart and put it back together again! Let's applaud all children, no matter what their abilities are, and encourage them to excel in the subjects in which they are interested. We can expose them to all the math and reading we can, but we can't make it "soak in".

Kay Tetley
West Plains, Missouri 65775
573-258-1293

Katnik, Paul

From: jknodell@mycitycable.com
Sent: Monday, December 12, 2011 7:57 AM
To: ESEA Waiver
Cc: sheri@pelopidas.com; lslay@slayandassociates.com; kcasas@childrenseducationalalliance-mo.org
Subject: Waiver

My feeling is that the ESEA waiver is probably needed but part of me is not comfortable with lowering standards on any level. I hope that this waiver request is accompanied by rigorous accountability standards in place of the federal standards. As you know, Missouri public education is far from being world class and bold reforms are needed to right the ship. Please use this opportunity to put strong measures in place to keep up the pressure on school districts to aim higher. Just letting them off the hook of AYP will not help the Top 10 by 20 initiative. Joe Knodell

Katnik, Paul

From: Kate Casas [kcasas@childrenseducationalliance-mo.org]
Sent: Wednesday, December 14, 2011 11:25 AM
To: ESEA Waiver
Subject: ESEA Waiver Request Comments

Commissioner Nicastro,

I would like to thank the Missouri Department of Elementary and Secondary Education for giving the public a chance to comment on DESE's Elementary and Secondary Education Act Waiver Request. It is commendable that Commissioner Nicastro and the DESE staff invest so much time in listening to the voices of parents, educators, elected officials, and non-profits dedicated to improving education for all Missouri's children.

The Children's Education Alliance of Missouri (CEAM) is a non-profit organization whose mission is to support policies that encourage access to high quality educational options for all Missouri students, including those who do not succeed in a traditional academic setting. As such, we appreciate DESE's willingness, through the request for an Elementary and Secondary Education Act (ESEA) Waiver from the Federal Department of Education, to work with individual school districts to ensure the policies that govern Missouri's schools are not only flexible enough to meet the needs of districts across our geographically and demographically diverse state, but also maintain high standards and hold teachers, administrators, and school boards accountable for achieving high student outcomes.

While we are pleased that DESE is using the opportunity to apply for an ESEA Waiver to look at its own accountability standards and to alter some of its current practices in an effort to align itself with best practice and research, CEAM has a few concerns about the draft waiver. These concerns are detailed below:

1. Student Growth Model

CEAM appreciates DESE's willingness to think critically about the best way to include student growth data in the Annual Performance Reports for each of Missouri's 522 school districts. We have been closely watching as DESE decides between the MU Value Added Growth Model and the Student Growth Percentiles Model.

Our research indicates that the MU Value Added Growth Model (MU Model) is far superior to the Student Growth Percentiles (SGP). The MU Model is much more accurate and gives a more fair and balanced view of what is happening at both the district and building level. The SGP is untested in other states/districts, and the methodology behind this model has been called into question by many respected academics. As such, CEAM believes DESE will not be able to use the results generated from the SGP to make determinations about the accreditation status of districts, the performance of individual buildings, or the effectiveness of teachers. For the ESEA Waiver to be effective in Missouri, CEAM feels as though DESE has no choice but to ensure the MU Model is the Missouri model for measuring student growth.

2. Subgroup Reporting

While the draft ESEA Waiver Request does mention that there will be subgroup reporting, there is no mention of what subgroups will be monitored and how that information will be used. CEAM feels that DESE needs to ensure districts are still responsible for reporting the achievement levels of all subgroups required under the current ESEA law. Additionally, DESE should state in the Waiver Request that districts will not only be held accountable for all student achievement, but that they also will be held accountable for closing the achievement gap between white and minority students as well as between economically disadvantaged and non-economically disadvantaged students.

3. Last in—First out

The Draft Waiver mentions Missouri's antiquated Last in—First out policy, which is currently required by the Revised Missouri Statute 168.122. CEAM understands DESE is required to comply with current Missouri law. However, there is plenty of evidence to show that this current law is not good for children. CEAM suggests that DESE add repealing this statute to its legislative priorities for the 2012 session and include this and other legislative priorities in the draft Waiver Request.

Thank you for considering our concerns. If you would like to discuss them further, you can reach me at 314-809-5042 or kcasas@childreducationalliance-mo.org.

Sincerely,

Kate Casas

State Director

Children's Education Alliance of MO

4742 McPherson Ave

St. Louis, MO 63108

P: 314-454-6544

C: 314-809-5042

Katnik, Paul

From: Annette Lowrey [annette.lowrey44@gmail.com]
Sent: Wednesday, December 14, 2011 3:04 PM
To: ESEA Waiver
Subject: proposed nclb Waiver

Dear DESE/MO School Board;

I have just read the 42 page draft of this proposed waiver to sidestep the federal NCLB. Seems the cure is worse than the disease. Until I get paid and get state employee benefits, it is not permissible for teachers to be reviewed in this proposed manner. I understand the need for high achievement, but step by step, local school districts are losing their control. As a social studies teacher, I recognize that these steps are leading our state and our nation to a new form of control which is not democratic. I would first like to see our state leaders at all levels submit themselves to these types of evaluations. What if your job was based on the performance of your constituents success?

What about funding? This proposed plan calls for many types of training, retraining and professional development, not to mention the man hours required to write more curriculum. Our school system is bare bones now. Our computer systems are outdated and the district cannot afford a full-time computer technician. My district is in school improvement, and what I've noticed is that the teachers spend a great deal of time in meetings for improvement, and this disrupts the classroom. Students need consistency to succeed. With schools having to hire new teachers every couple of years, this consistency goes by the wayside. I also see this as a way to keep school costs down. As a tenured teacher, my tenure is my reward for the hours put into training and performing. By taking away this perk, I believe the state will lose many very qualified teachers who no longer want to spend their days jumping through more hoops for little or no reward.

Teachers with tenure are part of the backbone of any community. I would hate to lose my home because of a lost job based, even in part, on the performance of my students on any given day, on a test. I would also like to see the "research" that was done to support this proposed draft. Don't you understand that there is no one equation or one formula that will fix each problem at each school equally? Because we live in a country that allows choice and free public education, not all children want to go to college or embrace our middle American values and goals. America is a bell curve, the world is a bell curve.

If this is the way the MO State Board of Education goes, then I would want to see the funding provided to back up these mandates. Unfunded mandates have stressed the districts and everyone who works in a school. I think the tax payer's money would be better spent to upgrade school facilities, technology and buildings. I haven't had a raise or step increase for 3 years and I am okay with that as long as I am allowed the time to plan my lessons. I feel rewarded when the students perform well on tests, and more rewarded when they finish school and are successful. I am fine without career ladder. I am not fine with the State of Missouri, or other non-teacher, telling me I am inadequate for this job. The only people who truly know this are the principle, superintendent, other teachers and the parents.

Please explain the need for argument and opinion writing at all grade levels. This is a higher level skill. We are forgetting that children learn at different rates. Isn't that the heart of differentiated learning? Isn't the classroom teacher the most skilled at determining the rate a child could or should learn? If not, what a waste of 4-6 years of college training to be a teacher. Are the people making these policies classroom teachers or lawyers? As a social studies teacher, I foresee the need for the state to mandate exactly what subjects are to be offered for each grade level in order to cover the material for the tests, again, taking away local control. Please just give us a

complete and detailed curriculum, not just frameworks, and please give each school a class schedule so every school in MO will be on the same page.

I believe the state of MO did take over control of the St. Louis school district. How is that going? In two years, has that district turned around? I have participated in early levels of MAP test item writing, and in MAP test evaluations. Again, this great idea was left unfunded, yet we teachers did a great deal of work to no avail. Please do not set lofty goals, which will only be abandoned because of lack of funding. Please do not tie any part of teacher's evaluation to student performance. If you do, you clearly do not understand children, the dynamics of families in poverty, or what teachers go through on a daily basis because we love to teach.

Remember that Woodrow Wilson's 14 points and League of Nations was a grand idea, but not workable. Do not set us up for failure. No Child Left Behind, as you know, and now realize, is a grand idea. By asking for a waiver, Missouri concedes that it is not a realistic goal. Please reevaluate this proposal. Give the superintendents, principals and teachers credit for being highly educated, highly professional people, capable of making decisions and evaluating programs and personnel for quality. Treat us like professionals, not untrustworthy criminals.

Respectfully,

Annette Lowrey

Katnik, Paul

From: Mary Masek [mmasek@ktis.net]
Sent: Wednesday, December 14, 2011 6:22 PM
To: ESEA Waiver
Subject: Concerns

I want to express my concerns about DESE applying for a NCLB waiver. The federal government has not stipulated what Missouri schools will have to do in place of NCLB if our waiver is approved. Schools in Missouri are not given enough money now to meet the needs of our students. If the federal government (or state government) decides that we need to meet more requirements without any money to help pay for these extra requirements, Missouri schools are not going to be able to afford to do that or the schools will have to take money that is needed for other areas and move it to meet more requirements. Also, schools will not have time to implement the changes necessary by the end of the 2011-12 school year. How will schools have time to complete additional requirements by then? Please reconsider your decision to apply for the waiver. Thank you.

Mary Masek
Jonesburg Elementary
Montgomery County R-II School District

Katnik, Paul

From: Carter, Susan [scarter@bolivarschools.org]
Sent: Thursday, December 15, 2011 8:40 AM
To: ESEA Waiver
Subject: No to waiver

To whom it amy concern:

After having reviewed the draft of the waiver I have these thoughts.

Primarily, it seems that it is justification of the same futile busy work that has kept teachers from being able to put all their effort into educating their students.

Secondly, it seems an excuse to hire more people to "manage" the futile busy work.

The only good point that I observed was that special needs students will have the option to use technical programs for their assessments in lieu of the end of course exams.

I am officially opposed to the waiver.

Susan Carter
Spanish I and Environmental Science Teacher

Katnik, Paul

From: Grabowski, Beth [bgrabowski@bolivarschools.org]
Sent: Thursday, December 15, 2011 1:16 PM
To: ESEA Waiver
Subject: Flexibility Waiver

Please slow down and wait for specifics in regard to the Flexibility Waiver. There are many "unknowns" connected with it currently. Missouri should not apply until we know the specific expectations, costs, and regulations. Respectfully--Beth Grabowski, teacher in Bolivar R-1 School District

Katnik, Paul

From: Stephen Kleinsmith [skleinsmith@nixaschools.net]
Sent: Thursday, December 15, 2011 2:39 PM
To: ESEA Waiver
Subject: Waiver feedback...
Attachments: AVG certification.txt

Dear DESE,

I just review the **Online Presentation Introducing Waiver Application** (22-min. recording). It was very well prepared and delivered. I, for one, am supporting the plan for proposing a waiver to NCLB. Although we (NPS) have performed very well under most of our current accountability systems, we also know that success should be measured with more of an emphasis on "continuous improvement." This is something all schools and all children will benefit from all the while holding public schools accountable for results.

Stephen Kleinsmith, Nixa Public Schools, superintendent

Katnik, Paul

From: Pat Conley [PConley@pkwy.k12.mo.us]
Sent: Friday, December 16, 2011 10:23 AM
To: ESEA Waiver
Subject: ESEA Flexibility Waiver
Attachments: VictimOfItsOwnSuccess_txt.indd.pdf

I have serious reservations about Missouri's request for a waiver. For far too long, education has been buffeted by one storm of reform after another. The results of such an approach have hardly been improvement. Before we inaugurate another storm season, though, I hope that we have a serious re-examination of some of the assumptions underlying education.

I have attached a pdf file of my book *A Victim of Its Own Success: American Education at a New Crossroad*. The book offers not only criticism of the status quo but also makes some very practical suggestions for reform in teacher education and teacher evaluation.

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Katnik, Paul

From: Dale Vandeven [dvandeven@ashland.k12.mo.us]
Sent: Friday, December 16, 2011 1:00 PM
To: ESEA Waiver
Subject: Waiver request delay

To Whom It May Concern:

I am writing this afternoon to ask that the State Board of Education delay submitting a waiver request in February. I believe there are components that are too vague and may not represent a change that is better for Missouri schools.

Thanks for taking the time to read this request.

--

Dale Van Deven
Principal
Southern Boone High School

Katnik, Paul

From: Frank Killian [killianf@richland.k12.mo.us]
Sent: Friday, December 16, 2011 2:54 PM
To: ESEA Waiver
Subject: Whom It May Concern,

Whom It May Concern,

My name is Frank Killian, Superintendent at Richland R-1 School in Essex, Missouri. My only question concerning MSIP 5 and NCLB is will there ever be a measuring tool for Vocational students as a positive goal instead of just the 180 follow-up. I have a hard time understanding why we are telling students that are good with their hands that becoming a plumber, electrician, mechanic, truck driver, wood worker, etc. is not a good option for success. AS long as education continues to push more core classes on students along with the message that going to college is the only way to be successful, we will continue to fail our kids that need to be vocational involved. Is there any tool or any plans to give more importance to vocational classes, which I know is almost a form of going back to old school tracking but if certain students are better served on a vocational track than why do we as educators continue to push every student towards college?

Maybe I am on the wrong thought track, if so help me re-direct my thought process.

AS for the waiver and the thought the commissioner shared with the SEMO Supt. group of Missouri wanting to move towards one set off criteria instead of two (State and National), I believe every educator and administrator is firmly behind the commissioner with this thought process.

Thanks for listening,

frank Killian
Superintendent

Katnik, Paul

From: Dave Shalley [dshalley@scotland.k12.mo.us]
Sent: Friday, December 16, 2011 3:20 PM
To: ESEA Waiver
Subject: Waiver

I think we need more information prior to the submission of the NCLB waiver.

Katnik, Paul

From: Rick Roberts [rroberts@cardinals.k12.mo.us]
Sent: Friday, December 16, 2011 3:30 PM
To: ESEA Waiver
Subject: Thoughts on Waiver

Dear Sirs,

As a small school Superintendent we continually are looking for ways to improve our schools and our students. If we make a change of any kind we take time to research, check the data, and make decisions based on the needs of our students. ALWAYS we make decisions based on input from our staff. All successful organizations succeed with the input from those who are in the trenches doing the work. They desire the input from everyone before a decision is made!

My concern is that we again are trying to push something through without ample time to discuss, research, and develop a solid plan of action. There has not been enough thought or input from the stakeholders. This seems to be the norm instead of the exception in the past few years. Here we are again, with plans for education that have not been run by the people who will be implementing things. Haste in passing something, just to get it through is not a good idea!

Yours in what is best for **students** NOT organizations, or Governmental regulations

Rick Roberts
Supt. Schools Shelby Co. R-4

Katnik, Paul

From: Charles, Randy [RCharles@mail.stcharles.k12.mo.us]
Sent: Friday, December 16, 2011 3:42 PM
To: ESEA Waiver

First of all, let me thank you for your efforts to pursue a waiver of federal NCLB sanctions. While I support pursuit of this waiver, I question the rush with which this is being done.

Other than the fact that some schools may benefit from the waiver as soon as possible, I see no reason to move so quickly. It is much more important to address such a complex issue correctly than it is to address it quickly. For that reason, I urge you to delay your timeline and allow time for increased input and for the development and inclusion of added detail.

Thank you for considering this request.

Randal Charles

Superintendent
City of St. Charles School District

Katnik, Paul

From: Robert Brinkley [bbrinkley@odessa.k12.mo.us]
Sent: Friday, December 16, 2011 3:44 PM
To: ESEA Waiver
Subject: NCLB Waiver

To Whom It May Concern:

This letter is being written to voice my concern over the No Child Left Behind (NCLB) waiver that is being discussed by the State Board of Education.

While, I do agree that the requirements of NCLB are unrealistic, I feel we should not act in haste to waive them at this time. I feel we should have further discussions before acting. Some of the discussions should include the fiscal notes tied to eliminating the requirements and a better understanding of what the new state requirements will include as a result from accepting a waiver. I see no advantage to acting in haste to accept the waiver and ask the State Board to have additional conversation prior to acting on such waiver.

Sincerely,

--

Robert C. Brinkley
Superintendent
Odessa R-VII School District
816-633-7037

Katnik, Paul

From: David Buck [David.Buck@wrightcity.k12.mo.us]
Sent: Friday, December 16, 2011 3:48 PM
To: ESEA Waiver
Subject: NCLB Waiver Comment

Thank you for collecting comments regarding the proposed NCLB Waiver.

First and foremost, I am in favor of seeking a waiver and going to one accountability system. I do have concerns with the draft that is currently on your website. I appreciate the opportunity to line those out via this comment period.

Within the System of Support, it is vague as to what this will entail and what delivery system this will utilize. Cost? RPDCs still the method of delivery? We hear rumors of going to an RFP. This may be more economical, and for those of us on I-70, it may work well. However, my concern is outstate Missouri. If an RFP for ELL is awarded to a place centered in St. Louis, what does that mean for the NW or SW part of the state? It would be nice to iron these details out and for districts to come to understand them before we include them in a waiver request.

Another concern if awarded, does this not accelerate some plans that we are trying to take our time and do correctly? MSIP 5 next year instead of 2013? The new Missouri Evaluation System model has been progressing nicely. Does a waiver put more high stakes in this arena before we are finished tweaking it?

The last concern I have is if something is in the waiver, do we as a state have the ability to change items in the waiver as the need arises? Let's say a part of the Teacher Standard Rubric, after using it for a year, is off base. Can we change it? Or, is it now part of the Federal Regulations.

I appreciate the opportunity. Enjoy,

IT'S A GREAT DAY TO BE A WILDCAT!

David Buck
Assistant Superintendent
Wright City R-II School District
90 Bell Road
Wright City, Missouri 63390
Office: 636-745-7200
Cell Phone: 636-236-0876
Fax: 636-745-3613



"Synergy is the highest activity of life; it creates new untapped alternatives; it values and exploits the mental, emotional, and psychological differences between people." – Stephen Covey

Katnik, Paul

From: grover, kathy [groverk@clever.k12.mo.us]
Sent: Friday, December 16, 2011 4:00 PM
To: ESEA Waiver
Subject: NCLB Waiver Comments

Regarding Missouri's NCLB Waiver Proposal please consider the following questions:

1. Should Missouri wait to request an NCLB Waiver until MSIP5 scoring guides are crafted and tested? One of the benefits listed in a state waiver is that school districts would no longer be measured by more than one set of standards. How can the USDOE approve/disapprove a measurement system that is yet to be defined?
2. What are the consequences for states receiving a waiver? Have the "strings" to receiving a waiver been fully explained? Is there some kind of "contract" that serves to protect the state's interests if a waiver is granted and accepted?
3. What is the cost projection of implementing the proposed Missouri NCLB Waiver? Can we afford it?
4. If ESEA is positively revamped, can waiver states opt back in to the ESEA (NCLB) system?
5. The current draft is vague...to whose interpretation of the document will Missouri schools be accountable?
6. Bottom line...let's wait and see how this plays out elsewhere...Race to the Top has not turned out to be as rosy as everyone thought it would be...the first draft of MSIP5 has been greatly improved by taking the time to hear input and collaborate with stakeholders...3rd and 4th Cycle MSIP taught us the importance of being explicit in our language...let's replicate good practice and shun poor practice.

In the last several years it has become habit to rush into things, seek instant gratification, and push to be among the first. On occasion, leaders have found it necessary to retract statements and completely abandon initiatives simply because they did not take time to count the cost and research outcomes of actions. In this situation, patience and observation could yield abundant rewards.

Kathy Grover, Ed.D.
 Assistant Superintendent, Curriculum and Instruction
 Clever R-V Schools
 103 S. Public Avenue
 Clever, MO 65631
 417-743-4800 (phone)
 417-743-4802 (fax)

"In a word, I'll say it: if we preserve unity in essentials, liberty in non-essentials, and charity in both, our affairs will be in the best position."-- Rupertus Meldinius circa 1627

Katnik, Paul

From: Sherry Heavin [sheavin@pcr3.k12.mo.us]
Sent: Friday, December 16, 2011 4:06 PM
To: ESEA Waiver
Subject: Waiver

I would encourage DESE to **NOT** submit a waiver in February. It is my understanding that this waiver could actually be worse than the NCLB requirements. Several states have rejected the waiver based on financial considerations alone. Why can't we have time to involve ALL stakeholders in this decision? NCLB legislation paints the picture of a failing educational system. It is my opinion that we need further investigation so as not to rush into sanctions (from the waiver) that could result in additional costs that our state simply can't afford and more criteria that sets schools up to fail. The plan may have long-term implications for school districts, does not include a financial impact study, and would result in school districts losing local control. It is so important for all stakeholders to thoroughly investigate this waiver and weigh the pros and cons. Rushing into NCLB painted an unrealistic picture of the educational system. Now some believe the waiver may be worse than the legislation. Please do not send the waiver in until teachers, parents, superintendents, and all stakeholders have had the opportunity to thoroughly investigate the financial and educational implications of such a waiver

Sherry Heavin

Superintendent
Phelps County R-III
573-435-6293

Katnik, Paul

From: Roberts, Sherry [sroberts@bolivarschools.org]
Sent: Friday, December 16, 2011 4:54 PM
To: ESEA Waiver
Subject: No Child Left Behind Waiver Request

Please do NOT submit a waiver request in February for the No Child Left Behind Waiver Request so that continued discussions with all stakeholders can be done to craft a waiver request that will relieve districts from the sanctions of NCLB without incurring additional costs or accountability burdens.

Mrs. Sherry Roberts
Science and Gifted Education
Bolivar Middle School
604 W. Jackson
Bolivar, MO 65613

Katnik, Paul

From: Jones, Randy [rjones@bolivarschools.org]
Sent: Saturday, December 17, 2011 8:17 AM
To: ESEA Waiver
Subject: NLCB waiver

Don't do it with so little input from stakeholders.

Katnik, Paul

From: Shawn Stringer [sastringer@sbcglobal.net]
Sent: Saturday, December 17, 2011 12:22 PM
To: ESEA Waiver
Cc: Ann.Jarrett@mnea.org
Subject: Reply to how to improve Missouri Schools

To DESE

You want feedback on how to improve Missouri schools. Stop all the pressure on teachers to have 100% proficiency for all students at grade level.

I have noticed that schools and DESE does not even follow the given policy on MAP and EOC testing. I remember reading that if a student is 2 or more reading grade levels behind and scores below basic on CA then retention is a possibility. IF this is the case, then why do I work at a high school where we have students still reading at the elementary level????? Also we have students/parents, who culturally and their given generation, do not have the same educational values, and have difficulty seeing the value of education, even when presented with earning potential etc. They expect immediate rewards, bigger and better, and not including grades/school awards. How about if schools go back to basics and teach critical thinking skills? I subbed quite a bit in a variety of schools, with different economic levels, when MAP testing started. Some schools "freaked out" and started teaching to the test, even buying test improvement materials. Did it help? NO. We need to have students who can think and solve problems given to them, not just spout facts. Currently, I work in a district, where students expect to be "spoon fed" answers and solutions, instead of having to think. Their ACT scores will not improve unless we worry less about cramming them full of the "facts of the curriculum." We need to teach them how to think and work out problems. Also, creativity in the classroom is being left out, teachers are deemed creative because of inventing games or assignments that are "different." Yet, students are not allowed to use their own creativity or will ask for a lot of help so their project look like the teachers.

No Child Left Behind cannot be interpreted as all students score proficient at grade level. I believe that a student should be judged or test scores show a percentage of improvement in a given subject area. The goal should be that students should read at high school level by graduation, after 4 years of English which should include remedial reading and writing. Students should be able to write a cohesive paper. They should be able to pick a 4 year math track- colleges test students for math skills-too many students take higher level math in h.s. and still end up repeating same classes in college. As for science- 4 years of science, but with different levels so students can be given the chance to take more advanced classes. Social Studies should also be 4 years with different levels and course offerings. Creativity should be encouraged.

Also everyone going to college, is it the law that students have to attend college right after h.s.? Let's not leave out taking 2 years of tech in high school or attending a tech school after high school.

College will always be there. Schools also need to do a better job or preparing students for college by promoting it, believe it or not at the elementary level. All high schools encourage college but forget to give students a detailed road map to aid the students and parents, especially first generation college students.

As for my last comment, I work in the special education field at the high school level. The students are at the functional level. We need to develop better work programs, in and out of school. These students need real life skills (as do a lot of the general education students).

As educators, we must remember that are job is to prepare students for being able to survive the real world, not be able to score proficient on a test.

Thank you for your time an allowing me to add my comments. If you have any questions or need clarification, please just respond to this email.

Katnik, Paul

From: Sandra Manley [smanley@pcssd.k12.mo.us]
Sent: Saturday, December 17, 2011 2:11 PM
To: ESEA Waiver
Subject: No Child Left Behind Waiver Request Comments

To: Missouri Department of Elementary and Secondary Education

The NCLB Waiver proposal draft on behalf of the state of Missouri-DESE appears to be comprehensive yet hastily assembled and somewhat nebulous. Since, the proposal seeks to move current federal regulatory, administrative and reporting requirements to state-developed plans. It makes sense to me that the state of Missouri should spend more time and effort investigating all the ramifications of such a waiver and not proceed with such a commitment at such a rapid pace. A step of such magnitude should have significant support across the state before approval. The waiver request should be extremely clear as it relates to the assurances being made by the state of Missouri and the cost of these assurances. Considering the current financial positions of our schools and the dire projections for further significant state education funding cuts, the cost projections for this waiver would need careful scrutiny.

Please consider this a request for DESE to refrain from submitting the waiver request in February. This would allow discussions to continue and allow more input and explore exactly what would and would not happen as a result of the NCLB waiver approval. Therefore, please consider the following:

- The current DESE draft waiver is a vague plan that has long-term implications for Missouri School Districts.
- The financial impact data is missing.
- MSIP 5 would go into effect immediately upon approval of the draft waiver in lieu of 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.

Why the rush? The decisions made now will affect our schools for years to come and there is no justification that I can see that requires Missouri to rush into this without careful, prudent thought and investigation.

As a Missouri school superintendent, I am encouraging DESE to wait and continue to have discussions soliciting broad based comprehensive input across the state and design a waiver request that would protect districts from the sanctions of NCLB without additional costs or accountability measures.

Respectfully submitted,

*Sandra Manley, Superintendent
 Pemiscot County Special School District
 1317 West State Highway 84
 Hayti, MO 63851*

573-359-0021 (phone)
 573-359-6525 (fax)

Katnik, Paul

From: Donna Moffatt [dmoffatt@mail.mccreek.k12.mo.us]
Sent: Sunday, December 18, 2011 12:53 PM
To: ESEA Waiver
Subject: Federal Waiver

As the state of Missouri enters into MSIP 5 involving a change from what districts have known for the last 20 years it seems we should ensure it is done correctly. It is our Board's belief that if any controls over curriculum, teaching standards, etc. those decisions should come from the local districts whose patrons have vested interest in how we prepare our students for the communities they will reside and work in. February is too soon to hurry such important decisions. I am asking for more time to make decisions that will impact our district for years to come.

Sincerely,

Donna Moffatt, Superintendent
Macks Creek R-V School
245 State Road N
Macks Creek MO 65786
"Pirate Pride"

Katnik, Paul

From: link Luttrell [llutt@festus.k12.mo.us]
Sent: Monday, December 19, 2011 7:42 AM
To: ESEA Waiver
Subject: Waiver

To Whom It May Concern,

Normally, I do not write objections to proposed policies etc. However, after reviewing the proposed WAIVER for NCLB, I am writing to voice my concern. First and foremost, there appears to be a 'rush' to simply craft a document and get it submitted. Our local MASA group has not had anyone from DESE speak to us about the specifics. In addition, it appears that upon approval MSIP – 5 becomes effective immediately rather than in 2013. There is also no financial impact analysis indicated. I ask that DESE slow down and seek further input and adequately explain specifics to stakeholders.

Thank you.

Link Luttrell, Ed. D
Assistant Superintendent
Festus R-VI

Katnik, Paul

From: Neill, Magda [mneill@bolivarschools.org]
Sent: Monday, December 19, 2011 7:51 AM
To: ESEA Waiver
Subject: waiver

Please take more time to research all the implications of this "waiver" issue. We have already been subjected to unreal standards through the NCLB mess. Please let common sense prevail. M. Neill

The DESE draft waiver request is a vague plan that has long-term implications for Missouri School Districts.

- Missouri's draft waiver request has no financial impact study attached to it.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.
- There is no reason for such quick action.

Katnik, Paul

From: Lisa Denny [ldenny@cole.k12.mo.us]
Sent: Monday, December 19, 2011 8:16 AM
To: ESEA Waiver
Cc: Cole Co. R-I - Jerry Hobbs
Subject: No Child Left Behind

I want to encourage the agency to NOT submit a waiver request in February and to continue discussions with all stakeholders to craft a waiver request that will relieve districts from the sanctions of No Child Left Behind without incurring additional costs or accountability burdens.

Sincerely,

Lisa Denny
Russellville High School Teacher

Katnik, Paul

From: Chris Wilson [cwilson@kennett.k12.mo.us]
Sent: Monday, December 19, 2011 8:25 AM
To: ESEA Waiver
Cc: cwilson@kennett.k12.mo.us
Subject: Waiver Response

The waiver draft seems very vague and I do not feel enough time and research has been put into the effort. The draft has no information regarding the financial impact that will be placed upon the state or the local districts.

MSIP 5 and Common Core standards are not finalized and now we are wanting to jump into another project without knowing the full details.

Please take a step back and see what the long term effects of the waiver would be before moving forward.

Again, local districts are going to get more unfunded mandates placed upon us when our funds have been and will continue to be cut.

Sincerely,

Chris Wilson

Katnik, Paul

From: Becky Albrecht [balbrecht@trentonr9.k12.mo.us]
Sent: Monday, December 19, 2011 8:28 AM
To: ESEA Waiver
Subject: Waiver Request

I urge you to NOT submit a waiver request in February and to continue discussions with all stakeholders to craft a waiver request that will relieve districts from the sanctions of NCLB without incurring additional costs or accountability burdens.

It is my opinion that the draft waiver proposal is too much, too fast, and too vague. The request should be extremely clear as it relates to assurances made by Missouri and the cost of those assurances.

Becky Albrecht

--

Becky Albrecht
Superintendent
Trenton R-IX Schools

Katnik, Paul

From: Boyd, Rikki [rboyd@central3.org]
Sent: Monday, December 19, 2011 8:42 AM
To: ESEA Waiver
Subject: DESE NCLB Waiver Request

Dear Missouri Department of Elementary and Secondary Education,

My name is Rikki Boyd. I am a teacher in the Central RIII School District. I am writing this letter in order to encourage this agency NOT to submit a waiver request in February. I feel that discussions with all stakeholders should continue in order to craft a waiver request that will relieve districts from the sanctions of NCLB without incurring additional costs or accountability burdens. Here are some reasons why I feel this way:

- The DESE draft waiver request is a vague plan that has long-term implications for Missouri School Districts.
- Missouri's draft waiver request has no financial impact study attached to it.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.
- There is no reason for such quick action.

I appreciate your consideration.

Sincerely,

Rikki Boyd

--
 Rikki Boyd
 West Elementary
 Reading and Math
 431-2616 ext 2125

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Katnik, Paul

From: kirkbeth@windstream.net
Sent: Monday, December 19, 2011 9:02 AM
To: ESEA Waiver
Subject: NO WAIVER REQUEST

Please do not submit a waiver request in February and please continue discussions with all stakeholders to craft a waiver request that will relieve districts from the sanctions of NCLB with out incurring additional costs or accountability burdens.

Please for the sake of our students, teachers, and administrators.

Thank you!

Concerned Parent/Former Teacher/Substitute Teacher B. Reynolds

Katnik, Paul

From: Bruce Borchers [borchersbruce@rockwood.k12.mo.us]
Sent: Monday, December 19, 2011 9:01 AM
To: ESEA Waiver
Subject: NCLB Waiver

Greetings,

I am writing to encourage the agency to NOT submit a NCLB waiver request in February and to continue discussions with all stakeholders to craft a waiver request that will relieve districts from the sanctions of NCLB without incurring additional costs or accountability burdens.

Why do I suggest not going forward with the waiver request at this time?

- The DESE draft waiver request is a vague plan that has long-term implications for Missouri School Districts.
- Missouri's draft waiver request has no financial impact study attached to it.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.
- There is no reason for such quick action.

Thank you for considering this input...

Respectfully,
Bruce Borchers

BRUCE T. BORCHERS, PH.D.
SUPERINTENDENT
ROCKWOOD SCHOOL DISTRICT

636-733-2005

GIVE ME SIX HOURS TO CHOP DOWN A TREE AND I WILL SPEND THE FIRST FOUR SHARPENING THE AXE. -
ABRAHAM LINCOLN

Katnik, Paul

From: Kile, Laura [lkile@central3.org]
Sent: Monday, December 19, 2011 9:39 AM
To: ESEA Waiver
Subject: NCLB waiver

It seems that DESE is in a rush to take action on the NCLB waiver. I am unclear as to why there should be such an immediate action on something that will impact districts throughout the state so significantly. There is no reason to rush this process at this time. Didn't DESE learn from this type of behavior in March when they took an unpopular MSIP 5 plan to the state board without significant input from stakeholders? Decisions such as these should be made with great care and clarity, along with an opportunity for input from the stakeholders involved. As it currently stands, the DESE draft waiver requests appears to be largely vague with no mention of costs that may be incurred. It would be in the best interest of the stakeholders to have a financial impact study attached to it in order to ascertain the full implications involved. After all, this waiver request would have long-term implications for Missouri School Districts. Once again, there should not be a rush to push this through. Leading into the next point, what is the purpose of making MSIP 5 effective immediately upon the approval of the draft waiver rather than in 2013? Again, it seems that this is all being rushed through which makes me leary.

Finally, it seems that local control is in jeopardy. The community has the right and opportunity to elect local officials to manage the affairs of the local community and district. It appears that the draft waiver request is attempting to take away the job of the local governing boards by giving DESE the control of determining the evaluation system that each school district will use, the compensation employees receive, which employees receive tenure, which employees are non-tenured, and even which employees are assigned to specific buildings. It seems that DESE wishes to take the reins from our local elected officials. This seems to be a very dangerous move. I am very concerned that my rights as a voter in my district are being taken. I have an opportunity to get to know my local officials much better than those employed by DESE, of whom are hired in, rather than elected. Currently, I have a right to vote on the person that I believe to best represent and work for my district. With this proposal, it appears that I would not have the opportunity to have a voice in who is representing my district.

In closing, I am a working class citizen who takes care in making big decisions in my personal life. I must be cautious and take time to explore the details before haphazardly making a decision that has the potential to impact my life on a long-term basis. I am asking that the issue of the NCLB waiver be explored in more detail, with great care and consideration before rushing into a decision, and then looking back and thinking. "Maybe we should have checked that out before". Slow down. Just because we live in a fast paced society, doesn't mean we should make such important decisions in haste.

Thank you for allowing me an opportunity to share my concerns and suggestions.

Respectfully,

Laura Kile

--
Laura Kile
Middle School Guidance Counselor

Career Ladder Chairperson
CTA President
Central R-3 Schools
801 Columbia Street
Park Hills, MO 63601
573/431-2616 ext. 3112
573/431-5393 Fax
lkile@centralr3.org

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Katnik, Paul

From: perry gorrell [gorrellp@colecamp.k12.mo.us]
Sent: Monday, December 19, 2011 9:26 AM
To: ESEA Waiver
Subject: Waiver

Commissioner Nicastro,

I believe you are correct in investigating the merit of the waiver. Please take time not to rush into something that may have an adverse effect on our educational systems. I applaud your efforts in challenging us to continue to raise the bar in education, but in these current economic times, this waiver may become a financial burden for many of the districts across the state.

Sincerely,

Perry Gorrell
Cole Camp High School Principal

Katnik, Paul

From: Christy Coursey [Christy.Coursey@republicschools.org]
Sent: Monday, December 19, 2011 10:08 AM
To: ESEA Waiver
Subject: As an administrator in the state of Missouri, I am concerned about the bulleted items below. They were just recently brought to my attention and I would like to know more about this important issue before it is submitted. Please do not submit this waiver...

As an administrator in the state of Missouri, I am concerned about the bulleted items below. They were just recently brought to my attention and I would like to know more about this important issue before it is submitted. Please do not submit this waiver request until more time and discussion has been devoted to the waiver request.

- Missouri's draft waiver request has no financial impact study attached to it.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.
- There is no reason for such quick action.

Christy Coursey
Lyon Elementary
Assistant Principal
(417)732-3630
christy.coursey@republicschools.org

Katnik, Paul

From: John Elliston [john.elliston@sc.k12.mo.us]
Sent: Monday, December 19, 2011 10:44 AM
To: ESEA Waiver
Subject: waiver

DESE

As I would like to see NCLB go away, the waiver that the state has put together needs further refinement from the stakeholders. The waiver is vague in respect to the long-term implications for the school districts, I can't find any information about the financial impact to districts, and the local control of school districts would be further eroded. The time period to respond is poorly timed due to Christmas break. Please continue to refine the waiver and solicit input from the schools. There is no rush.

John Elliston
South Callaway Early Childhood

Katnik, Paul

From: Kyle Kruse [kruse@shamrocks.k12.mo.us]
Sent: Monday, December 19, 2011 10:52 AM
To: ESEA Waiver
Cc: roger.kurtz@mcsa.org
Subject: NCLB Waiver comment

To Whom It May Concern,

Having read and studied the **DRAFT** version of Missouri's **No Child Left Behind Flexibility Waiver Request**, I offer the following comments.

1. The proposal is quite vague in a number of areas. It refers often to documents or processes that will be developed, or will be put in place as funding allows. Should this proposal be accepted, the vagueness would give federal decision-makers wide latitude to dictate or pass judgment on broad swaths of the Missouri education system. ***This transfer of authority to federal interests is not acceptable to Missouri educators.***
2. This Missouri Department of Elementary and Secondary Education has been forced to substantially reduce staff, and thus capacity, over the last few years. The department has made Missouri schools aware that it is underfunded and understaffed, and not always able to return phone calls or turn around documents in a timely fashion. This proposal, however, commits the department to a number of new responsibilities that will require both personnel and resources. ***It seems unlikely the department will be able to gain additional funding in the near future. Therefore, it is unclear how the department expects to fulfill these new obligations without further diminishing programs and processes already in place.***
3. This proposal would commit Missouri schools to a number of substantial changes. Given the potential scope of these changes, it seems logical that some form of cost projection and/or cost analysis should be available. Neither are. ***It is impossible to make an informed, responsible, decision about moving forward with this proposal until DESE and Missouri schools have an understanding of the costs that would be incurred.***
4. The proposal seems to grant DESE the power to ultimately determine the teacher evaluation system used by each school system, as well as to dictate compensation, tenure decisions, non-renewal decisions, and assignment of employees to specific buildings or classrooms. While DESE may not truly intend to make such decisions for every school district, the language of this proposal would allow such maneuvers. ***Needless to say, it is not appropriate (or desirable) for DESE to assume this level of authority.***
5. Last spring, DESE took the MSIP 5 plan to the state board without first gaining broad input from Missouri educators. The plan had a number of flaws, and drew an outpouring of criticism from across the state. The flaws in the plan were addressed only when the state board and DESE provided Missouri educators reasonable opportunities to give input. DESE seems to be repeating their MSIP 5 missteps with the NCLB Flexibility Waiver Request. There has been little or no opportunity for input from Missouri educators. ***Even the Commissioner of Education has admitted it is mostly a "cut and paste" job. Missouri can, and should, do better.***

I would suggest that DESE postpone applying for a No Child Left Behind Flexibility Waiver Request until such time it can develop, jointly with Missouri educators, a proposal that is detailed, workable, and appropriate for Missouri schools and children.

Thank you for this opportunity to provide comment. If I can provide additional information, please call me at 573-237-3231.

Kyle Kruse
 Superintendent
 New Haven School District

Katnik, Paul

From: Linda Pruett [linda@stjschools.org]
Sent: Monday, December 19, 2011 11:07 AM
To: ESEA Waiver
Subject: concerns with NCLB Waiver application

As an Assistant Superintendent with a Missouri school district, I have concerns about the NCLB waiver application that DESE is planning to submit. I am concerned that the waiver request is very vague in its narrative and that the long-term implications for Missouri school districts have not yet been fully addressed. Especially in this negative financial time in our history, I am concerned that the state of Missouri has not fully examined the financial impact of this request.

Please note that I am not in favor of this at this time.

Thank you for your attention.

Linda Pruett, Ed.D.
Assistant Superintendent
St. James R-1 Schools
122 E. Scioto Street
St. James, MO 65559
081-094

Katnik, Paul

From: Kevin Goddard [kevingoddard@live.com]
Sent: Monday, December 19, 2011 11:32 AM
To: ESEA Waiver
Subject: waiver

To Whom It May Concern:

I have read through the proposed waiver application posted by DESE. I have several concerns that result in my asking the department to delay this application and proceed with stakeholder discussion and development. These concerns include:

The plan is vague and ambiguous.

The plan does not discuss the financial impact for individual districts.

This plan makes it seem that MSIP 5 would be in effect immediately.

The plan does not clearly address which functions and processes are shifted from the local level to the state level.

Is this waiver on a deadline? I am not sure why we are rushing forward into this application.

Thank you,

Dr. Kevin T. Goddard

Superintendent

Sarcoxie R-2 School District

Katnik, Paul

From: Todd Smith [smitht@louisiana.k12.mo.us]
Sent: Monday, December 19, 2011 11:59 AM
To: ESEA Waiver
Subject: Waiver Comments

We feel the process has been rushed, and should not be presented to the State Board until key details can be clarified.

Financial impacts must be evaluated before we commit to major changes.

Evaluation systems and requirements must be clarified and established in a co-operative manner.

I do not understand the rush to apply - the implications of such haste could be devastating to our schools.

--

Todd G Smith, Ed S
Principal, Louisiana High School
Louisiana, MO
(573) 754-6181

Katnik, Paul

From: Carter, Susan [scarter@bolivarschools.org]
Sent: Monday, December 19, 2011 12:05 PM
To: ESEA Waiver
Subject: waiver

To whom it may concern:

As a veteran educator, I urge you not to submit this proposed waiver request in February. Please take into consideration ALL stakeholders, especially the students who will suffer the lack of time that their teachers will be able to spend on them due to the extra workload that will be required to implement this fiasco.

Why doesnt DESE come up with a curriculum themselves, get all the materials and resourses together, document them and "line them up" and then let us teach it?? At least adopt a particular publisher and use their materials? Most all publishers already align their textbooks with federal standards and will produce state alignments on request.

Sincerely,

Susan Carter
Spanish I and Environmental Science Teacher

Katnik, Paul

From: Fred Czerwonka [fczerwonka@mail.wphs.k12.mo.us]
Sent: Monday, December 19, 2011 12:30 PM
To: ESEA Waiver
Subject: Comment on Missouri ESEA Flexibility Waiver

I am writing in opposition to the submission of the current Missouri ESEA Flexibility Waiver. I respectfully request for the agency to NOT submit the waiver request in February and to continue discussions with all stakeholders to craft a waiver that will relieve districts from the sanctions of NCLB without incurring additional costs or accountability burdens.

I am hesitant to agree to a plan without feasibility studies to determine additional cost requirements for Missouri districts. The current draft of the Missouri ESEA Flexibility Waiver leaves many "unknowns" regarding district control of evaluation systems, employee compensation initiatives, and employment attrition decisions in general.

Andrew Carnegie wrote, "Teamwork is the ability to work together toward a common vision--the ability to direct individual accomplishments toward organizational objectives. It is the fuel that allows common people to attain uncommon results." As we strive as a state to improve student achievement through common standards and assessments, we must give time for common planning where voices are heard from all sectors and stakeholders.

For these reasons, I appeal to the agency to postpone submission of the waiver until more input may be acknowledged.

Fred L. Czerwonka, Ed. D.
Superintendent
West Plains R-VII Schools
417-256-6155



<http://zizzers.org>

ZIZZER (ZIZ'ZER) n. 1. an expert in any activity - adj. (colloq) FIRST RATE; 2. a person of the highest caliber, ability or reputation. 3. one who is victorious; (syn) A WINNER! Because to be a ZIZZER means to be the BEST at WHATEVER you do!

Katnik, Paul

From: Darryl Sauer [superintendent@zalma.k12.mo.us]
Sent: Monday, December 19, 2011 12:35 PM
To: ESEA Waiver
Subject: Waiver Request

Slow down on the NCLB waiver request, I feel it needs to be studied further.
Thank you.

Zalma RV School District
Darryl Sauer, Superintendent
superintendent@zalma.k12.mo.us
573-722-5504

Katnik, Paul

From: Russell Leek [rleek@perryville.k12.mo.us]
Sent: Monday, December 19, 2011 1:18 PM
To: ESEA Waiver
Subject: nclb waiver

I support the stance of MASA that more time is required to investigate this before DESE acts on it. While I believe that NCLB needs an overhaul, preferably become null and void, the Obama plan is no better and this wavier looks like a non-transparent Federal trap.

Thank you,
Russell D. Leek

"It's nonsense to learn only what you need instead of learning as much as you can." Marshall Faulk, 2011, days before entering the Hall of Fame

Russell D. Leek, EdS
Assistant Superintendent
Perry County School District #32
326 College Street
Perryville, MO. 63775
573-547-7500 ext 8328
rleek@perryville.k12.mo.us

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Katnik, Paul

From: Robin Miller [rmiller@warrensburg6.org]
Sent: Monday, December 19, 2011 1:36 PM
To: ESEA Waiver
Subject: Waiver

The Waiver application includes commitments of Race to the Top and Top 10 by 2020.....MSTA opposed those previously and that position has not changed. Two other specific items in the application which we oppose are compensation based on evaluation results (pg. 28 of the Waiver application) and teacher evaluations tied to student achievement data &/or high-stakes tests (pp. 36 & 40).

As a MSTA member I totally agree with the above concerns.

Robin Miller
Title Math Teacher
Maple Grove Elementary
Warrensburg R-6

Katnik, Paul

From: Barnes, Jessica [jbarnes@centralr3.org]
Sent: Monday, December 19, 2011 1:46 PM
To: ESEA Waiver
Subject: NCLB Waiver

As an educator, I would appreciate it if the proposed waiver was not rushed through and that the local control that has been fought for for so long would not be given up on so easily. It is easy to throw something out there when you are not the person who has to live with the consequences. School districts should have some say in what is proposed and also in who is hired, how much they are paid, and how much following through on the proposed measures is going to cost them. It is obvious that no one is going to meet the standards of NCLB, therefore, take things a bit slower and please come up with a solution that has been researched more thoroughly. Thank you for your time.

--

Jessica M. Barnes
Careers, Physics, & Chemistry Teacher
Central R-III Middle School
(573) 431-2616
801 Columbia St.
Park Hills, MO 63601

What we are is God's gift to us. What we become is our gift to God.
~Eleanor Powell

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Katnik, Paul

From: Phillip Fox [pfox@trico.k12.mo.us]
Sent: Monday, December 19, 2011 2:14 PM
To: ESEA Waiver
Subject: NCLB waiver

After reviewing the NCLB Waiver Request document I have some concerns about going forward with implementation.

1. What will this cost the State and my district? The financial situation in the state of Missouri is uncertain at best and now we may have to pay for another change in direction. If we are required to make a major financial commitment I can't see my district having the funds to implement any change. That brings me to the next point:
2. Why are we moving so rapidly to get this waiver? We have had to work under NCLB for almost a decade and now we are trying to change direction in a matter of months. Considering the size of the program change and the number of people effected by it, wouldn't it be more prudent to work on it for a few more months and get it right? I am certain that the many stakeholders in this matter have not been sufficiently consulted and feel left behind in the process. This approach was tried in the MSIP 5 process and there was such push back that it left many people with hard feelings toward any type of change.

--

Phillip Fox
Superintendent
Tri-County R-VII
Jamesport, MO 64648
660 684-6118

Katnik, Paul

From: Alicia Fisher [alicyfish@hotmail.com]
Sent: Monday, December 19, 2011 2:36 PM
To: ESEA Waiver
Subject: NCLB Waiver Application

To whom it may concern:

I am not in favor of MO's NCLB waiver application. I do not think there is enough time to get ready for a MSIP review at the end of this year. That is two years earlier than allowed by Missouri Statute. I also do not think a teacher's evaluation should be based on the student's standardized test scores. There are too many variables involved when a student takes a test. Also there are no resources or infrastructure to support the many components of this plan.

I have been teaching in Missouri for over thirty-five years. Thank you for listening to my opinion.

Sincerely,

Alicia Fisher
6-8 Teacher
New York R-IV
Hamilton, MO

Katnik, Paul

From: Steve Thompson [sthompson@usr2.com]
Sent: Monday, December 19, 2011 3:07 PM
To: ESEA Waiver
Subject: No Child Left Behind Waiver Request

I am concerned with the draft waiver proposal. It is **too much, too fast and too vague**. I believe that we should **investigate the possibility of requesting a waiver, but not without more support from the stakeholders**. Will this be another mandate without clear objectives that leave the local districts guessing what steps we need to take? Will this mandate be funded? If so will other funding to the schools be cut to pay for it? Will more accountability burdens be placed on already burden weary districts? I beseech you to take more time to make a complete financial impact study before moving forward this proposal. Your decision will be significant and the outcomes, either positive or negative, will reach all corners Missouri.

- The DESE draft waiver request is a vague plan that has long-term implications for Missouri School Districts.
- Missouri's draft waiver request has no financial impact study attached to it.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.
- There is no reason for such quick action.



Together We Make Learning Happen for Tomorrow

UNION STAR R-II
Steve Thompson
Superintendent
6132 NW State Route Z
Union Star, Missouri 64494

(816) 593-2294-Fax (816) 593-4427

Katnik, Paul

From: David.McGehee@leesummit.k12.mo.us
Sent: Monday, December 19, 2011 3:25 PM
To: ESEA Waiver
Subject: NCLB Waiver

Dear Commissioner:

On behalf of the Lee's Summit R-7 School District I am presenting our position that opposes a NCLB waiver by the state of Missouri for the following reasons:

- The DESE draft waiver request is a vague plan that has long-term implications for Missouri School Districts. There is no reason for such quick action.
- Of particular concern is that Missouri's draft waiver has no financial impact study attached to it.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake to propose a hastily prepared plan without significant input and clarity.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013. Currently districts are preparing for the 2013 implementation.
- Draft waiver request appears to allow DESE to assume a "big brother is watching approach" in which DESE will determine the evaluation system that each school district will use; the compensation employees receive, which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.

We do not feel it is in the best interests of the students in the Lee's Summit R-7 School District for the state of Missouri to pursue a NCLB waiver. Members of the Superintendent's Leadership Team and the Instructional Operations Team are willing to participate with DESE in processing this important decision.

Dr. David McGehee
Superintendent
Lee's Summit R-7 School District
301 NE Tudor Rd, Lee's Summit MO 64086

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Katnik, Paul

From: Mary Lynn Battles [marylynn.battles@sc.k12.mo.us]
Sent: Monday, December 19, 2011 6:08 PM
To: ESEA Waiver
Subject: Waiver

DESE,

While there is good reason to get out from under the punitive measures of NCLB, it is prudent not to rush into another situation that may be equally problematic. The haste to submit the waiver by February does not allow adequate time for all stakeholders to have input. The draft waiver is very broad and its vagueness could open a portal for long-term implications for Missouri School Districts. There are no indications of the financial impact that this plan may have on Missouri schools already facing significant annual cuts in revenue. Implementation of the wavier could further diminish local control. Please to not rush through this process. It is imperative to garner broad input from stakeholders. This waiver should clearly address all issues and be a reflection of the general consensus of Missouri's educational stakeholders.

There is no reason for such quick action.

Sincerely,

Mary Lynn Battles

Katnik, Paul

From: Dan Sample [dsample2@gmail.com]
Sent: Monday, December 19, 2011 10:05 PM
To: ESEA Waiver
Subject: Extremely Concerned about ESEA proposed by DESE

DESE's application for a waiver is an attempt to take your packaged programs from previous attempts of educational revision to make them passable for federal review and forced implementation over school districts, teacher organizations, and local controlled schools.

I am extremely concerned that your waiver application is not even close to the federal guidelines. For example, the federal guidelines refer to the "growth" of students instead of focusing on achievement levels. However, your application does the opposite.

I am especially concerned with the use of student achievement scores to affect teacher certification. This reflects another attempt by DESE to require more regulation into teacher certification.

It is almost unbelievable that you require teacher evaluation to student achievement data and not for principal's evaluations.

How many grass root teachers from Missouri were included in the development of this bureaucratic application?

Dan Sample

Katnik, Paul

From: John Jungmann [jjungmann@monett.k12.mo.us]
Sent: Tuesday, December 20, 2011 8:14 AM
To: ESEA Waiver
Cc: Monett R-1 - John Jungmann
Subject: NCLB Waiver Feedback

I have significant concerns with the following aspects of the waiver that has been published on the DESE website. The concerns include but are not limited to the following areas:

- The DESE draft wavier request is a vague plan that has long-term implications for Missouri School Districts that are not understood and are also have not proven to be effective by research (i.e. - merit pay systems).
- Missouri's draft waiver request has no financial impact study attached to it (very concerning, where will the money come from to implement these changes).
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013 (we have already set a plan for higher standards to go into effect with MSIP 5 now we will be rushed to implement all of these changes even more quickly).
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings (we are losing significant amounts of local control with this and other areas of the waiver).
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity (I have no problem with pursuing a waiver that is locally created with input from educators across the state, one that is backed by research, I do have significant concerns with pushing forward a waiver that does nothing but force us to comply with the new federal administration's education platform which lacks proof that several of these changes will actually result in better learning in our classrooms).
- There is no reason for such quick action when so much is at stake.

Thank you for considering the input provided above.

John Jungmann, Ed. D.
Superintendent
Monett R-1 Schools
900 East Scott
Monett, MO 65708
Phone: 417-235-7422 Fax: 417-235-1415

Katnik, Paul

From: Becky Callahan [bcall@festus.k12.mo.us]
Sent: Tuesday, December 20, 2011 8:20 AM
To: ESEA Waiver
Subject: Waiver request in February

I request that you do NOT submit the waiver request in February and continue the discussions to ensure that the best informed decision is made. This type of action should not be rushed.

Thanks-You,
Rebecca Callahan

Katnik, Paul

From: Adams, Nari [nadams@spsmail.org]
Sent: Tuesday, December 20, 2011 8:23 AM
To: ESEA Waiver; ESEA Waiver
Subject: public comments for NCLB waiver

To Whom it May Concern;

As a Missouri public school teacher, I oppose the waiver request. Two major concerns to me are: the lack of time available for teachers, districts, and school boards to review the waiver and its implications for Missouri students. My second major concern is the teacher compensation component based on evaluation results. There are many other variables that effect student performance besides the instruction of the classroom teacher.

Again, I oppose the NCLB waiver.

Sincerely,
Nari Adams

Katnik, Paul

From: Peggy Bryan [pbryan@monett.k12.mo.us]
Sent: Tuesday, December 20, 2011 8:26 AM
To: ESEA Waiver
Subject: NCLB Feedback

I have significant concerns with the following aspects of the waiver that has been published on the DESE website. The concerns include but are not limited to the following areas:

- The DESE draft wavier request is a vague plan that has long-term implications for Missouri School Districts that are not understood and are also have not proven to be effective by research (i.e. - merit pay systems).
- Missouri's draft waiver request has no financial impact study attached to it (very concerning, where will the money come from to implement these changes).
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013 (we have already set a plan for higher standards to go into effect with MSIP 5 now we will be rushed to implement all of these changes even more quickly).
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings (we are losing significant amounts of local control with this and other areas of the waiver).
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity (I have no problem with pursuing a waiver that is locally created with input from educators across the state, one that is backed by research, I do have significant concerns with pushing forward a waiver that does nothing but force us to comply with the new federal administration's education platform which lacks proof that several of these changes will actually result in better learning in our classrooms).
- There is no reason for such quick action when so much is at stake.

Katnik, Paul

From: Todd Willhite [twillhite@salisbury.k12.mo.us]
Sent: Tuesday, December 20, 2011 8:53 AM
To: ESEA Waiver
Subject: NCLB Waiver

On behalf of the Salisbury R-IV School District, I would like to request an NCLB waiver not be submitted in February. It seems like this request is being done too quick with long-term implications for our schools, including loss of local control. I am also concerned about possible financial impacts. I would like to see DESE slow down and take time to get adequate feedback from stakeholders.

Thank you for your consideration.

--

Todd Willhite
Superintendent
Salisbury R-IV Schools
1000 S. Maple Ave.
Salisbury, MO 65281

Phone: 660-388-6699
Fax: 660-388-6753

Katnik, Paul

From: George Thornton [gthornton@mail.wccards.k12.mo.us]
Sent: Tuesday, December 20, 2011 10:24 AM
To: ESEA Waiver
Subject: NCLB and NSIP 5

Do not rush into and NCLB waiver and implementation of NSIP 5 until more details are forthcoming, like how it will be paid for and how it is to be implemented. Our schools are struggling to keep up now financially without adding more "improvements" and regulations that aren't being paid for by anyone other than the district and patrons of the district. Do not allow this to pass.

George Thornton
Webb City High School

Katnik, Paul

From: April Hansen [ahansen@mail.wccards.k12.mo.us]
Sent: Tuesday, December 20, 2011 10:39 AM
To: ESEA Waiver
Subject: MSIP 5

To Whom It May Concern,

I have MANY concerns about this being approved. I am in the teaching field to prepare children for the future NOT a test. Our children deserve to be more than a number and a test score. Schools and teachers should have input on how the curriculum is taught and how it is taught. Teachers should not be paid because of a test score. I am very saddened that education has taken this path.

Very concerned educator,

April Hansen

Katnik, Paul

From: Mary Beth Scherer [mbscherer@concordia.k12.mo.us]
Sent: Tuesday, December 20, 2011 11:29 AM
To: ESEA Waiver
Subject: NCLB Waiver

As a Missouri Public School Administrator I have long recognized that the requirements outlined by NCLB while well-intentioned were flawed. However, the Missouri waiver to NCLB appears to be equally flawed. I use the term appears because it is a vague plan that can have harmful & expensive long term consequences for our public schools. I believe that a waiver is in order, but I think we need to step back, slow down and submit at a later date. I believe we need a financial impact study. Additional unanticipated costs could bankrupt some small districts. There is a concern on how much this waiver impacts local control and turns teacher evaluation and compensation from a local issue to a state issue. There is no magic reason to submit this in February, let's take the time to get this right. The process of MSIP 5 demonstrated the importance of having buy-in by our stake holders before making significant changes.

Mary Beth Scherer
Concordia-R-II School District

Katnik, Paul

From: Alisa Brown [abrown@concordia.k12.mo.us]
Sent: Tuesday, December 20, 2011 12:45 PM
To: ESEA Waiver
Subject: NCLB Waiver



To whom it may concern:

Concerning the waiver to NCLB, I would like to encourage you not to submit the request until there has been sufficient input from educators and time to work out all the details. I understand that the plan is very vague and potentially troubling. The waiver *appears* to allow DESE to determine the evaluation system each district uses including the compensation employees receive, which employees receive tenure, which are non-renewed, and, in larger districts, which buildings they are assigned to work. This plan appears to give a lot of local control to DESE. I am very disappointed in this and I know the financial crisis we find ourselves in now will only continue and worsen if this waiver should be accepted as is. Please do not submit the waiver until the details are worked out in a professional and acceptable way.

Respectfully,
Alisa Brown
Concordia R-II School
Vocal Music Instructor

Katnik, Paul

From: Deana Pomajzl [dpomajzl@pettisr12.k12.mo.us]
Sent: Tuesday, December 20, 2011 1:09 PM
To: ESEA Waiver
Subject: waiver request

I oppose the NCLB waiver request.

--

Deana Pomajzl
2nd Grade Teacher
Pettis Co. RX-II

Katnik, Paul

From: Kim Robinson [krobin@cuba.k12.mo.us]
Sent: Tuesday, December 20, 2011 1:49 PM
To: ESEA Waiver
Subject: NCLB Flexibility Waiver

State Board of Education and Dr. Nicastro;

As a member of the MASA District Accountability Committee I would like to voice my concern over the waiver request for NCLB. I have become increasingly concerned over the last year that DESE's focus has become compliance with federal regulations and seeking to be a part of any federal band wagon that seems to be going at the time. Don't get me wrong, federal compliance has always been a concern in Missouri, but it seemed that the former commissioner put what was good for students first and was willing to "hold the line" when it needed to be held and even at times weigh into a fight to change a federal requirement or at least to minimize the negative impact it might have on education in Missouri. We are not only seeing numerous changes at DESE (many of which were made in the name of budget cuts, only to be replaced by someone with no knowledge of the job and in some cases at a higher salary), but we are being "handed" decisions from DESE that have never had input from major educational stakeholders (MSIP 5 in its original version and now the NCLB waiver). It is past time that we stop letting the dog chase its tail. Let's get back to well thought out plans with all the stakeholders involved and do "what is right for students".

Where is the financial impact study that has been done with the NCLB waiver request? It is a similar question that curriculum directors are asking concerning switching to common core tests. The answer we have been given is that Dr. Nicastro has applied for and/or received grants....that is well and good, but what happens when the grants run out? Does the State Board and Dr. Nicastro truly not realize the financial crisis many schools are in with all the budget cuts? I keep thinking about the band that played on while the Titanic sunk.

We have difficulty getting anyone at DESE who can answer simple questions, does DESE really want to be put in the spot of figuring out what the evaluation system will be in each school district, what compensation employees will receive, and which employees will receive tenure? We are talking about a state that has been so emphatic about "local control" that a law was made that we could not have a state mandated curriculum. Now DESE wants to control employment and compensation?

The NCLB waiver is vague at best. What are the real long term implications for Missouri School Districts? There is a reason why California opted out of statewide implementation of a NCLB waiver.

It is time for common sense. I encourage the State Board and Dr. Nicastro to take a deep breath and think before they jump on this band wagon. Submitting this waiver could be another mistake in what is adding up to be some very costly mistakes for Missouri school districts.

Sincerely;

Kimberly A. Robinson
Assistant Superintendent
Crawford County R-II

Katnik, Paul

From: Dustin Storm [dstorm@mail.wccards.k12.mo.us]
Sent: Tuesday, December 20, 2011 2:42 PM
To: ESEA Waiver
Subject: NCLB Waiver

To Whom it May Concern:

The concept of a waiver sounds appealing, but at the present time we need better communication and more clarification before we should agree to the waiver. I am also concerned with the teacher quality evaluation process proposed and the use of data to rate teachers. I am all for teacher quality and the use of data to improve instruction, but I am not in agreement with my interpretation of how this may impact local schools.

In my opinion, all school districts are unique. I have worked in an inner city school district and I have worked in rural school districts. The challenges are totally different and yet we try to have a one size fits all approach. I do not have the answers, but I do believe more collaboration and better communication are needed from all involved.

If you have any questions, feel free to contact me at 417-529-9906.

Sincerely,
Dr. Dustin Storm
Carterville Principal

Katnik, Paul

From: roxanna mechem [roxanna.mechem@users.mrhsd.k12.mo.us]
Sent: Tuesday, December 20, 2011 3:15 PM
To: ESEA Waiver
Subject: Feedback on Flexibility Waiver

I want to thank the department for taking the time to put together a thoughtful approach. I applaud the mentions of science and social studies, as the state must continue to advocate for the four core subjects together (science and social studies are where the math and literacy are most meaningfully applied and must not be forgotten). I would like to advocate that Missouri must prepare students for college, career, and **civic life**. This preparation for civic participation is critical to our society and must be addressed.

Computer adaptive assessment is nice. Please continue development in science and social studies (not just com arts and math). I applaud the development of model curriculum and am very glad that social studies is included. When will science be developed? To continue in this theme, the state networks should contain meaningful assistance in all four core areas. Too often well meaning literacy and numeracy people try to advise in the science and social studies and that leads to more reading and math pushed into classes and pushing out the standards of those disciplines. We must have the habits of minds that all the core bring to students. To really meet college, career, and citizenship goals kids need rigorous instruction in all core areas.

Glad to see the end of course recommendations include three tests in four core areas. I also saw it was contingent on funding. I urge the department to keep all four core at the forefront.

On the subject of teacher accountability, I urge the department to make sure that teachers are held accountable by measures that directly correlate to the areas that they teach. While all subject areas support student success, it would be silly to hold art teachers accountable with Com Arts scores. Missouri's approach looked sensible, please make sure that test scores in two subject areas aren't randomly applied across subject areas. I am in favor of teacher accountability, but accountability in areas that are applicable.

Thanks!

Katnik, Paul

From: Dave Garber [dgarber@tinaavalon.k12.mo.us]
Sent: Tuesday, December 20, 2011 3:32 PM
To: ESEA Waiver
Subject: Please reconsider

Please do NOT present a waiver request in February for the following reasons.

- The DESE draft wavier request is a vague plan that has long-term implications for Missouri School Districts.
- Missouri's draft waiver request has no financial impact study attached to it.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.
- There is no reason for such quick action.

Katnik, Paul

From: Justin Larmie [jlarmie@sbcglobal.net]
Sent: Tuesday, December 20, 2011 4:30 PM
To: ESEA Waiver
Subject: NCLB waiver

I am an educator in the public school system who has extreme uneasiness about this waiver. While I do NOT support the current NCLB policy, I am still skeptical of the suggested waiver.

What exactly will this mean for us? What is the plan for funding? Is this just another way for us to impose harsher expectations on schools...especially those low-performing schools in which teachers are working tirelessly to try to improve scores to the unrealistic expectation set by NCLB, despite declining parental support?

As an educator, I need more clarity. I am not one who willingly sits idly by as others make unnecessary and often incorrect adjustments to policies that affect my livelihood.

Seeking more information,

Justin Larmie
816-810-0006

J Larmie
Sent from my iPhone

Katnik, Paul

From: Stallings, Janice [jstallings@liberty.k12.mo.us]
Sent: Tuesday, December 20, 2011 5:15 PM
To: ESEA Waiver
Subject: NCLB waiver

To Whom It May Concern:

I am concerned about the proposed NCLB waiver. It is unclear how the waiver would interact with NCLB's provisions, given that NCLB is coming up for re-authorization soon.

The time for public commentary seems very short. Between now and January 5th, almost all teachers, parents and students will be on winter break. In effect, this short timeline may allow only a day or two for comments by those Missourians with the greatest investment in public education.

Please consider delaying any further action on the NCLB waiver until teachers, parents and students have a chance to give input.

Sincerely,
Janice Stallings

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Katnik, Paul

From: Kimberly Welch [kwelch@pettisr12.k12.mo.us]
Sent: Tuesday, December 20, 2011 6:12 PM
To: ESEA Waiver
Subject: NCLB Waiver

To Whom it May Concern:

As a veteran of education with more than 20 years of involvement, I would like to express my concerns regarding the NCLB Waiver that DESE is proposing to request. While I agree that the requirements of NCLB are increasingly unrealistic as its maturity nears, I would also say that making a hasty waiver request may only complicate the issues long-term for Missouri School Districts. The waiver could place unnecessary strain on districts in the form of additional financial burdens, early implementation of MSIP 5, and changes in educator status. Additional pressure will be placed on small schools with limited human resources to implement professional development activities, and navigate changes. Is the state prepared for the intense intervention that will be required to support districts while they make these changes? Too much is at stake for a plan to be proposed without significant input from union representatives and individual stakeholders, and clarity from DESE on these critical issues.

The proposal is not without benefit. However, acting in haste may prove detrimental to student achievement in Missouri. Please reconsider your time frame, and wait to act when you have a more in-depth study of the effects and a plan that all stakeholders have worked to develop and support.

Graciously,
Kim Welch- Principal
Pettis County R-XII School
660-826-5385 ext.108
22675 Depot Road, Sedalia, MO 65301

Our Motto: Be Respectful, Be Responsible, Be safe"

Katnik, Paul

From: Karen Parker [kparker@houston.k12.mo.us]
Sent: Wednesday, December 21, 2011 8:00 AM
To: ESEA Waiver
Subject: NO to MSIP 5

To whom it may concern,

Why have we not learned from our past mistakes, unfunded mandates, when agreeing to accept gigantic federal programs? When will we wake up? When will we choose to tighten our belts so our children and grandchildren will not have to pay, and be controlled by a monstrous bureaucracy that does not represent the needs of our students? Please have the courage to say "no thank you" to Washington.

Respectfully submitted,
Karen Parker

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Katnik, Paul

From: Margaret Linn [linnm@chadwick.k12.mo.us]
Sent: Wednesday, December 21, 2011 8:30 AM
To: ESEA Waiver
Subject: NCLB Waiver

The NCLB Waiver is a bad idea for DESE. Who would have thought that during a time of family and peace, DESE would be trying to pass through this waiver that if approved has no real plan in place.

Moving up the MSIP review by 2 years, teacher evaluations tied to student test scores, and no money to implement an unspecific plan are only a few reasons why this seems very underhanded by the department.

I have been teaching for 16 years, all in the state of Missouri, 12 of those years in very small schools. I have seen many things come and go in education. DESE should wave goodbye to the NCLB waiver!

Margaret Linn
Chadwick Math Department

Katnik, Paul

From: Shirley [shirl@bpsnetworks.com]
Sent: Wednesday, December 21, 2011 8:45 AM
To: ESEA Waiver
Subject: Teacher evaluations

Teacher evaluations must NOT be tied to student scores. We teach our hearts out, but many students are not capable of learning much, and many do not care to learn ANYTHING. Most students would totally skip English if it were not a requirement for graduation. Some classes are more motivated and intelligent than others not depending on the teachers' capability. I am a classroom teacher.

Shirley T. Johnson
Cooter R4 Language Arts Teacher
573 695 3316

Katnik, Paul

From: Mary Meehan [mmeehan@pettisar12.k12.mo.us]
Sent: Wednesday, December 21, 2011 9:17 AM
To: ESEA Waiver
Subject: NCLB waiver request

Dear Colleagues, I would like to voice my concern regarding the NCLB waiver request. I feel, after reviewing information received on this topic, that more time should be taken to create a plan to move forward away from NCLB. Thank you for your consideration, Mary Meehan, teacher, grade 4, Pettis Co. R-XII School District

Katnik, Paul

From: Michelle Bobo [Michelle.Bobo@washington.k12.mo.us]
Sent: Wednesday, December 21, 2011 9:30 AM
To: ESEA Waiver
Subject: NCLB Waivers

Hello,

I am wanting to voice my opinion on the NCLB Waivers. I am concerned that this may not be a workable plan. Do districts have time to make the necessary changes? Is there money to fund the plan? Please consider these thoughts when making your decision. Thanks!

Michelle Bobo
Elementary Challenge Facilitator
Washington West Elementary
School District of Washington

Katnik, Paul

From: Shawna Wallace [wall1957@hotmail.com]
Sent: Wednesday, December 21, 2011 9:38 AM
To: ESEA Waiver
Subject: NCLB Waiver

As an educator of more than 20 years in the state of Missouri, I am against the NCLB waiver. The flaws of NCLB are apparent to everyone but I do not believe the program in place to waive, or replace it, is viable. I understand the ramifications of not meeting NCLB, but we need to be very careful about the next step in forming education standards for our schools.

Thank you for your consideration,
Shawna Wallace
West Platte R II School District

Katnik, Paul

From: Karen Sargent [ksargent@avr2.org]
Sent: Wednesday, December 21, 2011 12:30 PM
To: ESEA Waiver
Subject: NCLB Waiver -- Please Reconsider

In light of recent articles I have read regarding the draft of Missouri's NCLB waiver, I urge you to reconsider submitting this waiver to the State Board in January until all ambiguities are clarified and all unknowns are specified. While NCLB has had some negative impacts on school districts, we don't need to eliminate one problem simply to replace it with another problem.

Thank you.

Karen Sargent, Instruction & Curriculum
Arcadia Valley R-2 Schools
520 Park Drive, Ironton, MO 63650
Phone: (573) 546-9700 x 3
Fax: (573) 546-3934

Katnik, Paul

From: bhood@licking.k12.mo.us on behalf of Hood, John [jhood@licking.k12.mo.us]
Sent: Wednesday, December 21, 2011 12:36 PM
To: ESEA Waiver; Nichols, Tom; sheavin@pcr3.k12.mo.us; New Haven - Kyle Kruse; tamarak@iberia.k12.mo.us; roger.kurtz@mcsa.org
Cc: Sandra Aiken; Steve Denbow; Grant Crow; Joann Keeney; Melissa Werkmeister; Nancy Cook
Subject: Regarding NCLB Waiver
Attachments: nclb hood letter 12-20-11.docx

Attached is my response to the Department of Elementary and Secondary Education's No Child Left Behind Waiver Request.

--

Dr. John W. Hood
Superintendent of Schools
Licking R-VIII School District



LICKING SCHOOL DISTRICT R-VIII

JOHN W. HOOD, Superintendent
 P.O. BOX 179
 PHONE (573) 674-2911
 FAX (573) 674-4064

LICKING, MISSOURI 65542

Wednesday, December 21, 2011

To whom it may concern,

Before we rid ourselves of No Child Left Behind (NCLB) and the unobtainable expectations which have been utilized to publicly denounce the professionalism, character, and effectiveness of teachers and public schools across the state, I for one would like to know more about the next "Best" thing before it is implemented and our teachers and students are held accountable to it.

In time, it will become clear that public schools have not failed society, but that society and legislation have failed public schools. Public schools receive students "where they are" (academically, cognitively, socially, and economically), and teach, encourage, support, and protect them. Public schools have assumed more parental and family responsibilities than ever before. The Annual Performance Report (APR) does not begin to reflect the education, knowledge, and skills that public education provides to Missouri's students.

Please do not ask us to support an evaluation system that we know little about, and that may be used to misplace blame and attempt to show that the public school system is failing. Legislature needs to accept responsibility, support teachers, and appreciate public education. Public education is not the cause of broken homes, poor work ethics, low morals, and few jobs.

A revised Annual Performance Report (APR) and evaluation system should reflect what is being taught, work being completed, and goals/tasks being accomplished throughout the course of the year or evaluation period. The APR and Evaluation System should not be structured with the intent of creating competition. The focus should be teaching and learning, not payment based on performance results.

Food service, transportation, facilities and grounds can and should be operated as a business. Students, teachers and learning cannot be managed as a business! Students and teachers should not be incorporated into a business model based on competition and final expectations. Why? Ask a teacher who has received a class of students, assessed their knowledge and abilities, presented, modeled, and reinforced the curriculum, assessed and re-taught the curriculum, only to have a lay person and/or legislature tell you, "you have failed." Missouri educators are in the business of educating the individual! We are not able to control the cognitive ability of the student, the importance of education in the student's home, or the level of instability in a student's life. We are very good at motivating, encouraging, instructing, improving academic performance, and creating positive change. However, these educational indicators have not yet been reflected on the Annual Performance Report (APR). I am confident that Missouri educators can provide valuable insight as to the modification of our current Annual Performance Report (APR) and evaluation system. Please continue discussions with Missouri educators prior to submitting an NCLB waiver request.

Respectfully,

John W. Hood

Katnik, Paul

From: Dr. Bruce Johnson [bjohnson@sr2.k12.mo.us]
Sent: Wednesday, December 21, 2011 2:32 PM
To: ESEA Waiver
Subject: Hold the Line

I am NOT in favor of pushing this waiver through on such a short notice. I am first and foremost for reauthorizing ESEA and if that can't happen then the waivers to stop the climbing requirement of test scores. However, the evaluation portion of this waiver is frightening. The state should not be in the business of mandated evaluation, choosing tenure, etc.

We should have learned with MSIP 5 that we do indeed need to move slowly.

Thanks,
Bruce Johnson
Superintendent
Stanberry R-II

Katnik, Paul

From: Deb Orr [debora@warrensbu6.org]
Sent: Wednesday, December 21, 2011 2:30 PM
To: ESEA Waiver
Subject: Waiver comments

While I agree with the Department's desire to create a waiver request which will alleviate the NCLB stressors, I believe we have not allowed the time needed to discuss and process the main tenets of the plan with multiple stakeholders throughout the state. Too many details, financial implications, etc., are still unanswered and have the potential of having a major impact on the initiatives many districts have implemented during the past few years.

While NCLB is frustrating and has negative consequences on many districts, many of us have found that our patrons understand the absurdity of NCLB. Our staff, parents and patrons have put their faith in the consistency of MSIP and our APR. It is imperative that MSIP 5 and the accountability requirements of a waiver are carefully aligned and focused on propelling us forward. The short development timeframe of the waiver request has not allowed for careful scrutiny of the requirements.

I believe that, even though it will delay the submission of a waiver, additional time must be taken in discussions, development and review of a waiver request. I believe the additional time required to carefully, thoroughly review and develop a final document that educators have confidence in and that aligns with our goals is time well spent.

Thank you for the opportunity to provide input.

Deborah Orr, Ed.D.
District Superintendent
Warrensbu6 R-VI School District
438 E. Market, P. O. Box 638
Warrensbu6, MO 64093
660-747-7823

Children need to be both prepared and inspired. Jerry Weast

Believe and Achieve

Katnik, Paul

From: Marylee Hardy [marylee@stlsylvan.com]
Sent: Wednesday, December 21, 2011 4:05 PM
To: ESEA Waiver
Cc: Karen Carroll
Subject: Feedback for NCLB Flexibility Waiver Draft

After reviewing the Federal Department of Education Waiver and Frequently Asked Questions resources, we reviewed the NCLB Flexibility Waiver Request Draft Missouri is proposing and have the following comments:

- We are very concerned about Accountability and wonder what the consequences are if schools fail to demonstrate growth...the proposed waiver is very general with all schools following the same action of writing plans, but then what?
- The primary focus is only on 15% of the Title I schools. What about the other 85% that have also shown decline in growth? Is the state reducing these schools' Title I funds?
- The proposed Draft does not mention whether or not Missouri will offer a Preferred Vendor list to schools as the Federal guidelines suggest to offer academic support. Of course, we are interested in this process.
- Since 2012-13 is a training year and 2013-14 will be the year all schools are required to follow the plan, will there be SES available for families for the 2012-13 school year? If not, what will these children receive to compensate for the additional academic support they need?
- What happens to unaccredited schools? Additional funds for academic support?
- Descriptor of Instructional Improvement Coordinator and Instructional Improvement Staff should include they *not* come from a School District who had schools in School Improvement status...let's not hire the same people who have retired without a strong track record of academic gains. We also suggest you go outside of school personnel and look for qualified people in the business/education realm...not necessarily holding specific certifications...you are limiting your talent pool!
- Waiver does not contain actionable items...
- Waiver mentions stakeholders...who are the stakeholders you are referring to?
- Appears a great deal of focus has been given to the Teacher and Administrator Performance requirement and not as much on the students.

We would like to offer our input in future meetings and collaboration in helping the Missouri Department of Education reach Top 10 in 20 goal! Our experience and results from working with the children of Missouri for the past six years clearly demonstrates our interest in the education of Missouri families.

Thank you for allowing us to share our comments.

Mary Lee Hardy and Karen Carroll, CEO and Owner

Mary Lee Hardy, MS Education
 kcinterprises, inc.
 Vice President of School Partnerships
 Sylvan Learning/Ace it! Tutoring
 314-721-6222 - St. Louis office
 773-723-7046 Chicago office
 314.960.3596 - cell
 314.721.6212 - fax
marylee@kcinterprises.com
 St. Louis - Chicago

Katnik, Paul

From: Angie Murphy [amurphy@mail.wccards.k12.mo.us]
Sent: Wednesday, December 21, 2011 8:00 PM
To: ESEA Waiver
Subject: Missouri's NCLB waiver

To Whom It May Concern:

My name is Angelia Murphy and I am a Missouri educator. I would like to express my displeasure with the NCLB waiver and the onset of MSIP 5. I ask that you listen to the educators in the field and do what is right by not passing this legislation on to the U.S. Dept. of Ed.

Respectfully,

Angelia Murphy, Teacher
Madge T. James Kindergarten Center
amurphy@mail.wccards.k12.mo.us
(417)673-6075

Katnik, Paul

From: James Furman [jfurman@centurytel.net]
Sent: Thursday, December 22, 2011 7:24 AM
To: ESEA Waiver
Subject: NCLB Waiver

To Whom It May Concern,

Missouri has a chance to request a waiver to move federal regulation of NCLB to state control. I feel strongly that the intent is very good, but I have several concerns about the proposed transition.

As a retired teacher and former school board member/president, I am deeply rooted in wanting what is best for our kids and our schools. I do not believe that the current waiver proposal will be good for our kids or our schools because:

1. It has no plan for financial support. In our current economy, that is a major problem!
2. The draft waiver seems to put control of local schools into the hands of the State...employee compensation, the evaluation system used by each school, tenure, non-renewal decisions, and building assignments. These are decisions that should still be made by the local districts. It's very much like the State not wanting the Federal government to control NCLB.
3. This waiver would also put MSIP 5 into effect immediately upon approval of the draft waiver rather than in 2013.
4. With the MSIP 5 plan which was approved in March without input from educators in schools throughout Missouri, DESE seems to be setting a trend in decision making that doesn't bode well for democracy.
5. There really isn't a solid reason to rush into this and take action before all the details have been thought through carefully.

Please, for the sake of our future leaders, don't make rash decisions based on a limited timeline.

Thank you for your time and the consideration of the above points.

Yours in Education,
Rebecca F. Furman
LaPlata, Missouri

Katnik, Paul

From: John Heskett [john.heskett@att.net]
Sent: Thursday, December 22, 2011 11:29 AM
To: ESEA Waiver
Subject: MO-CASE Response to the Proposed NCLB Waiver Application

The Missouri Council of Administrators of Special Education (MO-CASE) appreciates the opportunity to provide its input to DESE regarding the proposed NCLB Waiver. We have studied the document and reviewed it carefully with members of the Advocacy Committee of the Board of Directors and the members of the Executive Committee of the Board.

Based on our reviews, MO-CASE respectfully requests that DESE not submit an NCLB Waiver Application at this time. We have taken this position based on several concerns as outlined below:

- The Application posted on the DESE website acknowledges the need to include students with disabilities within the scope of the Waiver; yet the application does not address several of the complex issues that are present when one considers how to appropriately involve students with disabilities. For instance, there is mention of computer adaptive assessment as a part of the SMARTER Balanced Assessment system being developed but there is little, if any, detail provided relative to how computer adaptive assessment will be used with the population or whether the full range of accommodations and access features such as assessments can offer will be allowable for students with disabilities to utilize. Neither is there a recognition of the need to transition from the current MAP Assessment to the SMARTER Balance Assessment. They two systems are very different in design and operation – a computer adaptive assessment can be incorporated into the SMARTER Balance system but a computer adaptive assessment is not possible with the current MAP assessment. With so little detail provided, MO-CASE is unable to offer substantive comment relative to the merits or concerns of the section set up to address the needs of students with disabilities.

With respect to the model curriculum, while school districts will benefit from model curriculum as they consider the changes that will be required in the

SMARTER Balanced Assessment, there is no discussion of how the needs of students with disabilities will be considered in the model curriculum.

Concepts and technologies such as Universal Designs for Learning (UDL) are required if the reader/reviewer is to consider Missouri's application

a valid attempt to address the needs of students with disabilities.

Given additional time, Missouri is fully capable of addressing these and other concerns relative to the needs of students with disabilities. And,

MO-CASE is a very willing partner in such work.

- The Application makes a general reference to the use of a Growth Model as a part of the accountability system in the narrative for Principle Two – State Developed Differentiated Recognition, Accountability and Support. However, there is no definition relative to the type of Growth Model that may be incorporated, nor is there a policy commitment to the use of a growth model as a part of the system. MO-CASE is strongly supportive of a Growth Model that is grounded in the assessment of growth demonstrated by individual students. Further, we are committed to calculations of AMOs that assess the rate of growth demonstrated by individual students rather than AMOs that target achievement at a predetermined level of achievement for students with disabilities. We believe a Growth Model premised on the values we have articulated respects the hard won achievement of students with disabilities. However, the draft of the Missouri application does not provide sufficient detail for MO-CASE to offer support or concern regarding the type of Growth Model envisioned. Further, it is unclear if the time and resources necessary to implement this kind of Growth Model will be available.

- The Application narrative relative to Principle Three – Supporting Effective Instruction and Leadership – fails to fully address the complexities of determining the efficacy of instruction provided by many special education teachers and certainly does not address the intervention provided by related service personnel. The personnel evaluation system is grounded in an expectation that “student achievement will form a preponderant and significant criterion for personnel evaluations”. For those teachers responsible for non-assessed grades or subjects, there is a reference to alignment to state standards. Similar to previously stated concerns, there is no detail relative to the conceptual framework of growth measures nor any apparent recognition of the complexity of such tasks; i.e. , validity and reliability of measurements that will be used to make continuing employment decisions.
- The Application will clearly require significant resources to implement yet there is no discussion of how such resources will be marshaled. Even with the resources that have been devoted to the development of the Smarter Balance Assessment system, the progress has been slow and may take longer than projected to complete. Development and implementation of a Growth Model approach to accountability, especially for use with students with disabilities, will require additional time and resources as will development and implementation of a radically different approach to personnel evaluation. Without a specific discussion of the resources that will be used to support the Application, it is difficult to understand how the proposal will come to fruition.

MO-CASE is deeply committed to high standards for students with disabilities. Further we absolutely support an school accountability system that is inclusive of the special education and related services provided for students with disabilities. While the rhetoric of “Reform for All” is accepted by most all groups, achieving the reality of “Reform for All” is a daunting task. MO-CASE appreciates the leadership DESE is willing to provide to move beyond the burdensome accountability provisions of NCLB; but, to achieve a meaningful accountability system truly designed for All Students will be complex and will require engagement of a variety of publics. MO-CASE is a willing partner with DESE in the design of an NCLB Waiver.

In so far as the U.S. Department of Education has articulated its willingness to accept Waiver Applications after the February, 2012 window, we strongly urge DESE to withdraw its intent to move forward with the application at this time. The policy issues involved in a meaningful waiver are so complex that the additional time will be highly desirable.

Sincerely:

John Heskett, Ed.D.

John Heskett, Ed.D.
Executive Director
Missouri Council of Administrators of Special Education - MO-CASE
316 Cheval Square Dr.
Chesterfield, Mo. 63005
314.660.2333
john.heskett@att.net

Katnik, Paul

From: kmedlin@media.willardr2.net on behalf of Kent Medlin [kmedlin@willard.k12.mo.us]
Sent: Friday, December 23, 2011 12:15 PM
To: ESEA Waiver
Cc: Kent Medlin; Roger
Subject: NCLB Waiver

DESE Officials,

A decade of NCLB accountability has resulted in many effects both positive and negative. I believe the increased measure of accountability has resulted in Missouri School districts pushing hard to improve and adopt reform models of research based learning strategies. This increase in performance of students proficient in learning has been dramatic. However, there have also been negative consequences. Currently a large percentage of Missouri School districts confuse their community by having to report that they have "failing schools" and at the same time are fully accredited by state standards. This simply results in school patrons asking "Why the double message?" I admit it would be favorable to operate under only one system of accountability however, I do not believe the timing, understanding, or buy-in to a Missouri waiver is currently in place. NCLB is due for re-authorization and even though the political gridlock in Washington has not allowed for a solution to be drafted everyone agrees that it must happen and it must be soon. It is my opinion that if a Missouri State Waiver is offered / accepted it will not only bring change imposed upon ourselves, it places the state at risk of regulations over and above, or possibly contrary to, any new re-authorization legislation. This would result in counterproductive efforts. Any waiver must be detailed and complete. Ambiguity will result in frustration for school organizations. The waiver should enjoy a wide base of support including buy-in from teacher, administrator, and board member organizations. At the current time, this does not exist.

With all due respect, it is my contention that a waiver offered at this time is premature. It lacks support from professional groups responsible for implementation. A waiver may very well result in either contradiction or excessive regulation above and beyond the next legislative effort to reauthorize NCLB.

Respectfully,

Dr. Kent E. Medlin
Superintendent of Schools
Willard MO

Katnik, Paul

From: Don_Marie Phillips [drp82@yahoo.com]
Sent: Sunday, December 25, 2011 9:20 AM
To: ESEA Waiver
Subject: NCLB Waiver Proposal

I would like to express my concern over DESE's decision to apply for a NCLB Waiver. I fear that this action may subject us to a situation even more unreasonable than NCLB. I hope that you will reconsider this decision.

As an educator, I am fully aware of the predicament we find ourselves in. Though my building has managed to stay out of the School Improvement category, my district has not. We have been involved in the struggle to improve student outcomes on the MAP, and it has been very difficult for everyone concerned. Our population is predominately underprivileged with very limited resources. Our students have experienced very little outside their small rural communities, and therefore, they do not approach the testing with a very broad storehouse of knowledge/experience. Most are handicapped due to their deprived backgrounds.

Please do not trade the current set of standards for one that is even more difficult to achieve. I agree with the stance of MSTTA, and hope that you will not proceed with the request for NCLB Waiver.

Very concerned,

Don Phillips, Principal
Matthews Elementary School
New Madrid County R-1 District

Katnik, Paul

From: Chris Hon [chon@pb.k12.mo.us]
Sent: Monday, December 26, 2011 9:12 AM
To: ESEA Waiver
Subject: Waiver

Missouri School Board,

I have studied the waiver draft proposal. This document is very vague and does not specifically list details for accountability. Also, I see no cost analysis regarding the waiver proposal. In our current funding crisis, cost must be determined before attacking any problem. I understand the philosophy behind one accountability standard, however the time and research has not been done to determine this is a better approach.

Chris Hon
Superintendent of Poplar Bluff Schools

Chris Hon
Superintendent of Schools

ACHIEVING EXCELLENCE THROUGH LEARNING: EVERY CHILD, EVERY HOUR, EVERY DAY

Katnik, Paul

From: Judith Delany [Delany-Judith@trojans.k12.mo.us]
Sent: Monday, December 26, 2011 10:00 AM
To: ESEA Waiver
Subject: Waiver Request

I applaud DESE for initiating improvements during this economic recession in order to move Missouri public education forward. I believe that our Commissioner is doing an outstanding job of leadership during a difficult time. However, I am also in agreement with some of the issues raised by MASA that are bulleted below. I respectfully request that more preparation be done prior to submitting a waiver request. Thank you for your consideration.

1. Missouri's draft waiver request has no financial impact study attached to it.
2. MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
3. The draft waiver request appears to allow DESE the authority to determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.

- 4.

"If I'd asked my customers what they wanted, they'd have said a faster horse." Henry Ford

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Katnik, Paul

From: Trey Moeller [tmoeller@mail.wccards.k12.mo.us]
Sent: Tuesday, December 27, 2011 11:13 AM
To: ESEA Waiver
Cc: Trey Moeller
Subject: NCLB Waiver

To Whom It May Concern:

While I am somewhat relieved by the opportunity to apply for a waiver from the federal NCLB requirements, I must say that there are aspects of the Missouri NCLB Waiver Request that are of concern and cause me to oppose it in its current form.

The prospect of moving forward with "replacement" requirements that are vague and uncertain is unacceptable (especially in regard to student achievement and teacher evaluations). It appears the current waiver request attempts to change the standards of accountability to a level not yet determined and places additional demands on schools with no prospect of funding those requirements.

Again, I oppose the waiver request as it is currently written.

Have a Great Day!

Trey Moeller
Assistant Superintendent
Webb City Schools
www.wccards.k12.mo.us
(417) 673-6000

Katnik, Paul

From: David Steward [dsteward@monett.k12.mo.us]
Sent: Tuesday, December 27, 2011 4:05 PM
To: ESEA Waiver
Subject: Concerns about Waiver Request

I have significant concerns with the following aspects of the waiver that has been published on the DESE website. The concerns include but are not limited to the following areas:

- The DESE draft wavier request is a vague plan that has long-term implications for Missouri School Districts that are not understood. Further, there is no research basis for many of the proposed items (i.e. - merit pay, state oversight of teacher assignment, etc.)

- There is no financial impact study accompanying the waiver request. What will happen if the waiver is approved and then funding is not adequate to implement the waiver requirements?

- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013 (we have already set a plan for higher standards to go into effect with MSIP 5 now we will be rushed to implement all of these changes even more quickly).

- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings (we are losing significant amounts of local control with this and other areas of the waiver).

- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity (I have no problem with pursuing a waiver that is locally created with input from educators across the state, one that is backed by research. I do have significant concerns with pushing forward a waiver that does nothing but force us to comply with the new federal administration's education platform which lacks proof that several of these changes will actually result in better learning in our classrooms).

Thank you for considering the input provided above.

David Steward, Principal
 Monett High School
 One David Sippy Drive
 Monett, MO 65708
 Ph: 417-235-5445
 Fax: 417-235-7884

visit us online at <http://monett.high.schoolfusion.us>
 follow us on Twitter at <http://www.twitter.com/monetthigh> like us on facebook at
<http://www.facebook.com/pages/Monett-High-School/230662933632111>

Katnik, Paul

From: Joe Knodell [jknodell@mycitycable.com]
Sent: Wednesday, December 28, 2011 10:57 AM
To: ESEA Waiver
Subject: NCLB waiver

Just wanted to register my support of the waiver request. The reforms DESE has agreed to implement will be very helpful in reaching Top 10 by 20.

Katnik, Paul

From: Richard Page [PageRichard@neosho.k12.mo.us]
Sent: Wednesday, December 28, 2011 12:42 PM
To: ESEA Waiver
Cc: Roger (roger_kurtz@mcsa.org)
Subject: flexibility waiver

Dear State Board,

As a school superintendent, I would like to share my concerns regarding the flexibility waiver as being proposed by The Department of Elementary and Secondary Education. I do appreciate the effort that has gone into the development of the plan, however, it seems that there are many unknowns about the proposal. In addition, the timing restrictions seemed to be hurried. Asking for comments during a time when many of the school districts are dismissed over the holidays is not the best time for open communication. In my opinion, there are at least three other areas that are questionable as to implementation, such as;

1. There is no indication of the estimated costs for the recommendations or positions being proposed.
2. MSIP is not ready for implementation to take effect immediately. The scoring guides and other areas have yet to be developed.
3. Will DESE decide; the compensation employees will receive, which employees will receive tenure, which employees are non-renewed and which employees are assigned to specific buildings.

I believe it is in the best interest of the state to take the time to respond to some of the questions being asked. Also, take the time to communicate all aspects of the waiver requests and to create an atmosphere of collaboration among all stakeholders. It is my hope that the flexibility waiver is less intrusive, clear in mission and more reasonable than the current No Child Left Behind.

Thank you for your time and understanding. I do appreciate the work of the DESE staff and the State Board of Education.

Sincerely,

Dr. Richard Page

Neosho Schools

417-451-8600

pagerichard@neosho.k12.mo.us

Go Wildcats!

Katnik, Paul

From: McClure, Stephen G. [mccluresg@umkc.edu]
Sent: Thursday, December 29, 2011 12:36 PM
To: ESEA Waiver; Fuchs, Curt
Cc: Cooper, Jerry; Pfauth, Debi A.; McClure, Stephen G.
Subject: Waiver Feedback
Attachments: NCLB Flexibility Waiver Feedback 122911.doc

Dear Curt,

It is important that you understand that I am in favor of the flexible waiver and I appreciate all the work that has gone into the request. I assume that charter schools had representation throughout the process. The application of APR to charter schools should help when comparing charters with other schools across the state. However, this will only occur as charter schools gain a better understanding of reporting standards and practices, and as the state develops fair and equitable adjustments for new charter schools and any public school adding grade levels.

Thanks for the leadership you provide.

Highest professional regards,

Steve

Steve McClure, Ph.D.
Assistant Director, Charter Schools
UMKC Charter School Center
5306 Holmes
Kansas City, MO 64110
Phone: 816-235-2616
Fax: 816-235-5270
mccluresg@umkc.edu

**Feedback for NCLB Flexibility Waiver Request on the December 5, 2011
Principle 2/Pages 18-19/Missouri School Improvement Program- System of Support**

It is important that charter sponsors, Regional School Improvement Teams (RSIT), and regional department staff coordinate their efforts and work together so that school academic improvement efforts are focused in the same direction.

Principle 2/Page 22/Accountability Process and Plan/Scoring Guide

(As it relates to **NEW** charter schools as well as, charter schools adding grade levels and other public schools adding grade levels)

It does not seem like there are any adjustments made under Principle 2 for a new charter school, or for *any* public school that is adding grade levels, to accumulate the same number of possible progress points as a school that has been in operation for five or more years.

Recommendation:

DESE would not publically report APR data for a school or grade level until five years of information is available. This would allow sponsors and the Department of Elementary and Secondary Education (DESE) to make recommendations to the Missouri State Board of Education based on five full years of data. This would better allow for consideration of Annual Performance Report (APR) data, in addition to, the school's academic performance in relationship to the school district where the charter school is located.

Alternative Recommendation:

This is based on MSIP 4 and will need to be adjusted after the public release of the MSIP 5 scoring guide. If adopted, this alternative recommendation could be an appendix to the MSIP 5 scoring guide.

This recommendation is that a school's APR NOT be made public until after 3 years of reported testing. This would provide new charter schools, or any public school adding grade levels, the opportunity to earn the same number of possible APR progress points as a school (district or charter) that has been in existence for 5 or more years (with the exception of APR 3 over 2 points). This would maintain the same number of points for a new school to achieve a "MET" status on all standards thus allowing a better comparison of new schools (after their third year of operation) to district and charter schools statewide. There will be those who will want to require new charters to be scored based on "Status Scores" alone during their first year and the same allocation for progress points as established schools starting in their second year, but this presents a significant inequity for new charter schools, or any public school adding grade levels.

1. The UMKC Charter School Center's recommendation regarding use of the **ANNUAL PERFORMANCE REPORT** is that DESE does not report Standard(s) "Met" or "Not Met" for a school until there is **three years** of MAP testing data available for that

school. It is recommended the three-year minimum reporting provision apply to Standard(s):

- 9.1*1 3-5 Mathematics
- 9.1*2 3-5 Communication Arts
- 9.1*3 6-8 Mathematics
- 9.1*4 6-8 Communication Arts
- 9.1*5 Algebra I Mathematics
- 9.1*6 English II Communication Arts
- 9.6 Attendance
- 9.7 Subgroup Achievement
- Bonus MAP Achievement
- Gap Bonus

This proposal would provide charter schools, new public school districts, and/or any public school adding grade levels partial equity by allowing them to accumulate the same number of possible progress points as a regular public school district. It would allow for prorating **Annual** and **Rolling Average** following year three and year four of testing, with the exception of the 3 Over 2 Progress Measure.

ANNUAL PROGRESS MEASURE POINTS

- **AFTER THREE YEARS OF TESTING**, the school would be eligible to earn 20 progress points for each of the two years if they increase 3 or more MAP Index Points (for a maximum of 40 progress points).
- **AFTER FOUR YEARS OF TESTING**, the school would be eligible to earn 13 progress points for any two years and earn an additional 14 progress points for a third year, if they increase 3 or more MAP Index Points in years two, three, and four (for a maximum of 40 progress points).
- **AFTER FIVE YEARS OF TESTING**, the school would earn points on the same basis as all other public schools in Missouri.

ROLLING AVERAGE PROGRESS MEASURE POINTS

- **AFTER THREE YEARS OF TESTING**, the school would be eligible to earn 30 progress points if the school's MAP Index Score Rolling Average of years two and three increases 3 or more MAP Index Points over the MAP Index Score Average of years one and two (for a maximum of 30 progress points).
- **AFTER FOUR YEARS OF TESTING**, the school would be eligible to earn 15 progress points if the school's MAP Index Score Rolling Average of years two and three increase 3 or more MAP Index Points over the MAP Index Score average of years one and two, and/or if the MAP Index Score Rolling Average of years three and four increase 3 or more MAP Index Points over the MAP index score average of years two and three (for a maximum of 30 progress points).
- **AFTER FIVE YEARS OF TESTING**, the school would earn points on the same basis as all other public schools in Missouri.

3 OVER 2 PROGRESS MEASURE POINTS

- **AFTER FIVE YEARS OF TESTING**, the 3 Over 2 Progress Measure would be available to charter schools on the same basis as all other public schools in Missouri.

BONUS MAP ACHIEVEMENT

Comparing third year MAP Index Scores to second year MAP Index Scores-

- K-3, K-4, K-5, Grade 5; charter schools would be eligible for Bonus MAP Achievement points if they improved on **both**:
 - 9.1*1 3-5 Mathematics
 - 9.1*2 3-5 Communication Arts
- Grade 6, 6-7, 6-8; charter schools would be eligible for Bonus MAP Achievement points if they improved on **both**:
 - 9.1*3 6-8 Mathematics
 - 9.1*4 6-8 Communication Arts
- K-6, K-7, K-8, 5-6, 5-7, 5-8; charter schools would be eligible for Bonus MAP Achievement points if they improved on **three out of four**:
 - 9.1*1 3-5 Mathematics
 - 9.1*2 3-5 Communication Arts
 - 9.1*3 6-8 Mathematics
 - 9.1*4 6-8 Communication Arts
- 6-9; charter schools would be eligible for Bonus MAP Achievement points if they improved on **two out of three**:
 - 9.1*3 6-8 Mathematics
 - 9.1*4 6-8 Communication Arts
 - 9.1*5 Algebra I Mathematics
- K-9; charter schools would be eligible for Bonus MAP Achievement points if they improved on **four out of five**:
 - 9.1*1 3-5 Mathematics
 - 9.1*2 3-5 Communication Arts
 - 9.1*3 6-8 Mathematics
 - 9.1*4 6-8 Communication Arts
 - 9.1*5 Algebra I Mathematics
- 6-10, 6-11, 6-12; charter schools would be eligible for Bonus MAP Achievement points if they improved on **three out of four**:
 - 9.1*3 6-8 Mathematics
 - 9.1*4 6-8 Communication Arts
 - 9.1*5 Algebra I Mathematics
 - 9.1*6 English II Communication Arts
- K-10, K-11, K-12; charter schools would be eligible for Bonus MAP Achievement points if they improved on **four out of six**:
 - 9.1*1 3-5 Mathematics
 - 9.1*2 3-5 Communication Arts
 - 9.1*3 6-8 Mathematics
 - 9.1*4 6-8 Communication Arts

- 9.1*5 Algebra I Mathematics
- 9.1*6 English II Communication Arts

GAP BONUS POINTS

When either of the two conditions below are met and the charter school has earned at least 40 Status + Progress points, the Gap Bonus may be used to determine that the Standard is “Met”.

- The MAP improvement of the charter schools’ minority population is greater than the MAP improvement of the State’s majority population when comparing the latest year’s MAP Index Score to the prior year’s MAP Index Score.
- The MAP improvement of charter schools’ free and reduced lunch population is greater than the MAP improvement of the State’s non-free and reduced lunch population when comparing the latest year’s MAP Index Score to the prior year’s MAP Index Score.

PLEASE NOTE:

It should be noted that if a charter school or public school district is phasing in additional grade levels, for example a high school, the “Met” and “Not Met” reporting of these new grade levels would be implemented after three years in the same manner as above. This would apply to:

- 9.1*5 Algebra I Mathematics
 - 9.1*6 English II Communication Arts
2. The UMKC Charter School Center’s recommendation regarding use of the **ANNUAL PERFORMANCE REPORT** is that DESE does not report Standard(s) “Met” or “Not Met” for a school until three classes have graduated. This would report the following Standard(s) based upon two years of data available at the time APR information is released.
- 9.3 ACT
 - 9.4*1 Advanced Courses
 - 9.4*2 Career Education Courses
 - 9.4*3 College Placement
 - 9.4*4 Career Education Placement

This proposal would provide charter schools, new public school districts, and/or any public school adding grade levels partial equity by allowing them to accumulate the same number of possible progress points as a regular public school district on an accelerated schedule.

- After there has been **two years of data** (and a third class has graduated):
 - **ACT-** The school would be eligible using the **Annual Progress Measure** for 4 points if the students scoring at or above the national average on the ACT increased from their first graduating class to their second graduating class by 1% or more (maximum of 4 points).

- **Advanced Courses-** The school would be eligible using the **Annual Progress Measure** for 4 points if there is an annual increase of 2% or more in the percentage of credits earned in the advanced courses (maximum of 4 points).
 - **Career Education Courses-** The school would be eligible using the **Annual Progress Measure** for 4 points if there is a 1% or more increase in the percentage of credits earned in career education courses (maximum of 4 points).
 - **College Placement-** The school would be eligible using the **Annual Progress Measure** for 4 points if there is a 1% or more increase in the percentage of graduates entering college (maximum of 4 points).
 - **Career Education Placement-** The school would be eligible using the **Annual Progress Measure** for 4 points if there is a 1% or more increase in the percentage of career education completers who are placed (maximum of 4 points).
- After there has been **three years of data** (and a fourth class has graduated):
 - **ACT-** The school would be eligible using the **Annual Progress Measure** for 2 points in each of the previous two years if the students have scored at or above the national average on the ACT increased from the previous graduating class 1% or more (maximum of 4 points).
 - **ACT-** The school would be eligible using the **Rolling Average Measure** for 3 points if their second and third year ACT % of graduates scoring at or above the national average increases 1% or more, over the first and second years' average ACT % of graduates scoring at or above the national average on the ACT (maximum of 3 points).
 - **Advanced Courses-** The school would be eligible using the **Annual Progress Measure** for 2 points in each of the previous two years if there is an annual increase of 2% or more in the percentage of credits earned in the advanced courses (maximum of 4 points).
 - **Advanced Courses-** The school would be eligible using the **Rolling Average Measure** for 3 points if their second and third year percentage of credits earned in advanced courses increases 2% or more, over the first and second years percentage of credits earned in advanced courses (maximum of 3 points).
 - **Career Education Courses-** The school would be eligible using the **Annual Progress Measure** for 2 points in each of the previous two years if there is a 1% or more increase in the percentage of credits earned in career education courses (maximum of 4 points).
 - **Career Education Courses-** The school would be eligible using the **Rolling Average Measure** for 3 points if their second and third year percentage of credits earned in career education course increases 1% or more, over the first and second years percentage of credits earned in career education courses (maximum of 3 points).
 - **College Placement-** The school would be eligible using the **Annual Progress Measure** for 2 points in each of the previous two years if there is a 1% or more

- increase in the percentage of graduates entering college (maximum of 4 points).
- **College Placement-** The school would be eligible using the **Rolling Average Measure** for 3 points if their second and third year percentage of graduates entering college increases 1% or more, over the first and second years percentage of graduates entering college(maximum of 3 points).
 - **Career Education Placement-** The school would be eligible using the **Annual Progress Measure** for 2 points in each of the previous two years if there is a 1% or more increase in the percentage of career education completers who are placed (maximum of 4 points).
 - **Career Education Placement-** The school would be eligible using the **Rolling Average Measure** for 3 points if their second and third year percentage of career education completers who are placed increases 1% or more, over the first and second years percentage of career education completers who are placed (maximum of 3 points).
- After there has been **four years of data** (and a fifth class has graduated):
 - **ACT-** The school would be eligible using the **Annual Progress Measure** for 1.3 points for two of the three previous years if the graduating class has scored at or above the national average on the ACT and increased from the previous graduating class 1% or more. If the school increases 1% or more all three years, the third year they would earn 1.4 points (maximum of 4 points).
 - **ACT-** The school would be eligible using the **Rolling Average Measure** for 1.5 points if their second and third year ACT % of graduates scoring at or above the national average increases 1% or more over the first and second years' average ACT % of graduates scoring at or above the national average. The school would be eligible for an additional 1.5 points if the third to fourth year ACT % of graduates scoring at or above the national average increases 1% or more over the second to third year (maximum of 3 points).
 - **Advanced Courses-** The school would be eligible using the **Annual Progress Measure** for 1.3 points for two of the three previous years if there is an annual increase of 2% or more in the percentage of credits earned in the advanced courses. If the school increases 2% all three years, the third year they would earn 1.4 points (maximum of 4 points).
 - **Advanced Courses-** The school would be eligible using the **Rolling Average Measure** for 1.5 points if their second and third year percentage of credits earned in advanced courses increases 2% or more over the first and second years percentage of credits earned in advanced courses. The school would be eligible for an additional 1.5 points if the third to fourth year percentage of credits earned in the advanced courses increases 2% or more over the second to third year (maximum of 3 points).
 - **Career Education Courses-** The school would be eligible using the **Annual Progress Measure** for 1.3 points for two of the three previous years if there is an annual increase of 1% or more percentage of credits earned in career education course. If the school increases 1% or more all three years, the third year they would earn 1.4 points (maximum of 4 points).

- **Career Education Courses-** The school would be eligible using the **Rolling Average Measure** for 1.5 points if their second and third year percentage of credits earned in career education courses increases 1% or more over the first and second years percentage of credits earned in career education courses. The school would be eligible for an additional 1.5 points if the third to fourth year percentage of credits earned in career education courses increases 1% or more over the second to third year (maximum of 3 points).
- **College Placement-** The school would be eligible using the **Annual Progress Measure** for 1.3 points for two of the three previous years if there is a 1% or more increase in the percentage of graduates entering college. The school would be eligible for an additional 1.3 points if there is a 1% or more increase all three years in the percentage of graduates entering college (maximum of 4 points).
- **College Placement-** The school would be eligible using the **Rolling Average Measure** for 1.5 points if the percentage of graduates entering college increases 1% or more, over the first and second years percentage of graduates entering college. The school would be eligible for an additional 1.5 points if the third to fourth year percentage of graduates entering college increases 1% or more, over the second to third year (maximum of 3 points).
- **Career Education Placement-** The school would be eligible using the **Annual Progress Measure** for 1.3 points in each of the previous two years if there is a 1% or more increase in the percentage of career education completers who are placed (maximum of 4 points).
- **Career Education Placement-** if their second and third year percentage of career education completers who are placed increases 1% or more, over the first and second years percentage of career education completers who are placed.
- The school would be eligible using the **Rolling Average Measure** for 1.5 points if their second and third year percentage of credits earned in career education courses increases 1% or more over the first and second years percentage of career education completers who are placed. The school would be eligible for an additional 1.5 points if the third to fourth year percentage of career education completers who are placed increases 1% or more over the second to third year (maximum of 3 points).
- After there has been **five years of data** (and a sixth class has graduated)
 - The **Annual Progress Measure** will be determined on the same basis as all other public schools.
 - The **Rolling Average Measure** will be determined on the same basis as all other public schools.
 - **The 3 Over 2 Measure** will be determined on the same basis as all other public schools.

This would allow DESE to report and the public to have a more accurate comparison between Charter LEAs and Missouri School Districts. In order to achieve equity, DESE must be flexible in fitting the ROUND PEG (charter schools and other public schools adding grade levels) into a SQUARE HOLE (MSIP 5 System).

**Feedback for NCLB Flexibility Waiver Request on the December 5, 2011
Principle 3/Page 37/Missouri model evaluation system**

It should be noted; the provisions related to Statue 168.221 RSMo are not a part of the Missouri charter school law and are not applicable to charter schools. Such as, a probationary period for new teachers, protocols for removal of a teacher, and the "last-in-first-out provision.

Katnik, Paul

From: Katherine Mitchell [kmitchell@mail.wccards.k12.mo.us]
Sent: Thursday, December 29, 2011 7:05 PM
To: ESEA Waiver
Subject: Concerned

Dear Congressmen,

I am a teacher in the Webb City School District and have been for 16 years. The new NCLB and ESEA that is being proposed is very disconcerting to me and my husband. We are both in education. The NCLB law was upsurd when it was implemented. This does not take into account the many special education students who do progress but at their own level. Of course, if you are in an area where all students are from affluent homes, your students will do well. But consider the district whose families are more than half from low income. This is the district I am coming from. This law **does not** need to be reinstated.

I come from a district which has more than 50% on free and reduced lunches. We have many students who come into our classrooms with little or no interactions from parents. I have one in particular now who steals leftover snacks from the trash can because he came from a home where there was little or no food and is always preparing for starvation. If we were evaluated according to performance, I have students in my room from these homes who were behind when we started. I would be punished for not getting them to where they needed to be because of an evaluation. When actually, they would be performing to the best of their ability, according to where they started. Yes, my students do perform well, I do have high expectations, and high scores for all my students. But, I do not wish to be evaluated for something I have no control over before they came to me.

These two measures need to be looked at vigorously and vetoed. It would not be beneficial to reinstate the NCLB. Nor would it be a wise choice to instate the ESEA.

Signed,
A Concerned Education
Katherine

Katnik, Paul

From: cgarrison@mail.wccards.k12.mo.us
Sent: Friday, December 30, 2011 7:26 PM
To: ESEA Waiver
Subject: NCLB waiver and MSIP 5

To whom it may concern:

These programs are nothing more than a fast track to new, unfunded and unspecified programs from the state.

A main concern is the attempt this program uses to tie standardized tests to teacher evaluations. This takes control away from local districts, parents and teachers in the education of their children. Not all tests are created equal, whether for our students or our teachers. There is no compelling evidence of any sort to support the validity or effectiveness of a single evaluation procedure.

Also, there are no funds connected with this waiver, but they will bring a significant amount of new regulations and rules (by implementing MSIP5 two years early, at the end of this year). No resources (funding) from the federal or state budgets mean the tab for these changes is likely going to be the local school districts.

Please do not support these programs.

Sincerely,
Catherine Garrison

mail2web.com - Enhanced email for the mobile individual based on Microsoft® Exchange -
<http://link.mail2web.com/Personal/EnhancedEmail>

Katnik, Paul

From: Douglas Garrison [garrisond@carthage.k12.mo.us]
Sent: Friday, December 30, 2011 8:04 PM
To: ESEA Waiver
Subject: NCLB Waiver and MSIP 5

I am writing to express my concern over the consideration that is being given to the NCLB Waiver and MSIP 5. I am concerned because of what this will do to school districts.

1. If the waiver is approved, school districts will not have sufficient time to implement provisions for MSIP 5.
2. Congress will likely enact new requirements.
3. There are way too many "unknown" factors because specific details have not been provided.
4. The application suggests statewide principal and teacher evaluation plans and takes control away from the school districts. DESE would become a "big brother" to school districts.
5. Due to the lack of resources and infrastructure, many of the components of this plan cannot be supported.

I would request that you please take the concerns into consideration.

Thank you,

Doug Garrison
Communication Arts
Carthage Junior High
(417) 359-7050

Katnik, Paul

From: Carrie Mayes [cmayes@mail.wccards.k12.mo.us]
Sent: Sunday, January 01, 2012 3:53 PM
To: ESEA Waiver
Subject: NCLB waiver and MSIP 5

As an educator in Southwest Missouri, I urge your to slow down on the rush to apply for the NCLB waiver. A few questions that I have are: How much will this cost to implement? In this time of recession, and constant education cuts, where are we going to get money for these changes? Also, rushing the implementation of MSIP 5 is very scary to me. There are so many components of MSIP 5 that are still unclear and will take time to put in place- rushing this process could be hazardous to our profession. I am urging you to reconsider the urgency of the waiver.

Thank you for your time,
Carrie Mayes

Katnik, Paul

From: Peggy Sartin [psartin@concordia.k12.mo.us]
Sent: Monday, January 02, 2012 9:10 AM
To: ESEA Waiver
Subject: Waiver Request

To whom it may concern,

I encourage Missouri's Department of Education not to submit a waiver request to NCLB (No Child Left Behind). I am an educator of Special Education at Concordia School District. This plan would be very expensive for my school district and would not be beneficial to the students we are asked to educate and prepare for the future.

Peggy Sartin

Katnik, Paul

From: Regina Knott [rknot@ridgeway.k12.mo.us]
Sent: Monday, January 02, 2012 11:29 AM
To: ESEA Waiver
Cc: Ridgeway R-V - Regina Knott
Subject: NCLB Waiver

Follow Up Flag: Follow up
Flag Status: Flagged

To the Officials of the State Board of Education and DESE:

I am writing to request that the Department of Secondary and Elementary Education (DESE) of Missouri take the time to fully investigate and fiscally explain the consequences and legal ramifications to school districts and students of the proposed Federal No Child Left Behind Waiver Request. My understanding is that the State Board of Education is to consider the Waiver Review in January 2012. This consideration date is premature, as Missouri teachers and administrators have not yet had time to determine what further accountability burdens and fiscal responsibilities to which such a quick decision by the State Board will obligate us for years to come.

I am further concerned that this exceedingly speedy and extremely vague proposed waiver action by the State Board will put MSIP 5 into effect immediately, rather than in 2013. Missouri School Districts are still battling the effects of multiple years of underfunding and unplanned cuts to the education budget, and have not yet had time or money to determine what shifts in personnel and instruction will be necessitated by the additional EOC and other mandated requirements of MSIP 5. The fact that the current DESE Waiver Request gives broad powers to the state, rather than local control, is quite disturbing. Responsibility for decisions and funding regarding teacher assignments, compensation, renewal/tenure, and the district evaluation system must reside with the district, and should remain under full local control.

DESE, the State Board of Education, and Missouri Legislators need to take the time to work together to fully study and address equitable funding of education for our school districts. Until the Foundation Formula is able to be fully funded, we should be extremely cautious about mandating structures that increase current accountability and the fiscal burden of Missouri School Districts. The acceleration of MSIP 5, the proposed NCLB Waiver, and level of state control in local employee matters are three areas of cost that have not been fully studied for fiscal impact. No further action should take place with the proposed NCLB Waiver until level, equitable funding has been determined.

Dr. Regina Knott, Superintendent
Ridgeway R-V School District

Katnik, Paul

From: dlawrence@aces.k12.mo.us
Sent: Tuesday, January 03, 2012 9:07 AM
To: ESEA Waiver
Subject: DESE / NCLB Waiver
Attachments: Waiver NCLB.pdf

TO Whom It May Concern,
Find attached a response for your request for comments regarding the proposed NCLB waiver.
Don Lawrence

Avenue City R-IX School District
18069 Highway 169
Cosby, Missouri 64436
 Phone: (816) 662-2305 Fax: (816) 662-3201
 Website: www.avenuecityschool.org

Don Lawrence, Superintendent
Becky Grimes, Principal



December 29, 2011

To Whom It May Concern:

I do not support DESE's determination to seek a waiver for NCLB. It is my opinion that NCLB has lost all credibility with the American people. The U.S. Department of Education's willingness to readily provide a waiver to any state seems to lend credence to that opinion.

It remains my opinion that the Federal government should have no jurisdiction, no authority and no decision-making ability regarding the local public schools. I encourage DESE to NOT submit a waiver request in February or at any time in the near future without significant input from Missouri's educators.

Missouri's rush to request a waiver simply places the state under a different yoke of oppressive sanctions. Exchanging one set of arbitrary and unreasonable rules and expectations for another set of similar expectations is foolish. In our rush to jump from one proverbial frying pan is it wise to leap into another scalding pot?

As was the case with the initial MSIP 5 standards proposed to the state board earlier this year, this waiver request has received no meaningful opportunities for discussions with the stakeholders of Missouri public schools. It is obvious that a continuing pattern of disengagement exists when it comes to major policy decisions at the state level. It appears nothing was learned when the state's educators contested the MSIP 5 standards proposed earlier this year. This waiver is another example of a quick rush to solve a significant problem. There are no quick fixes or easy solutions to difficult problems.

The current waiver language is unclear and nonspecific. Any policy decisions with long range implications for Missouri Schools should be specific and should indicate exactly what is expected, what those actions, those tests, those evaluations and those sanctions will cost. Those items should be identified and a timeline established for accomplishment. In addition, how those actions will take place and what requirements will be asked of students, teachers, administrators and patrons should also be clearly communicated. None of this should be determined without with the input of those being asked to implement the actions. To submit a waiver from NCLB to Washington D.C., prior to clear and detailed communication with the Missouri's educational leadership, is a major sign of disrespect to those being asked to implement any plan of progress and improvement.

Once again, it is my opinion that DESE should NOT submit a waiver request in February and should not submit a waiver until significant and meaningful discussions take place with the stakeholders who are expected to implement that waiver.

Sincerely,

Don Lawrence
 Avenue City R-IX

Katnik, Paul

From: Kendra Asher [kasher@ecarter.k12.mo.us]
Sent: Tuesday, January 03, 2012 9:24 AM
To: ESEA Waiver
Subject: waiver issue

I am opposed to this issue. You can not convince most people to support something when everything that's been provided by the U.S. Department of Education and DESE is really vague, and there are no cost estimates included. I can not support something that I do not know or understand the details or the possible consequences. The waiver would rely on student test scores as the major factor in teacher evaluation and compensation. This is not a true assessment of one teacher's work or accomplishments with students. What the student learned in the years previous also has an affect as well as whether or not students try their best. We inspire most of them to work hard, but there are so many other factors to a students success that has absolutely nothing to do with the teacher. It has become our job to not only teach them, but to know and understand their home life and to help them overcome any of those obstacles as well. A true assessment of whether or not the students are learning must come from direct contact in the classroom of how well the teacher works with and teaches his/her students. We as teachers try to expand their knowledge and their thirst for knowledge and when we are slaved to have to worry about test scores on a standardized test, it actually encumbers what we are trying to teach them. You have decided for us as to which times we have to teach certain things. For example, what year you HAVE to teach biology or physical science because of when that information will be on a test. Each of these subjects have a vast area of information to cover. If you cover planets in the first part of the year and earth science towards the end, but the testing occurs before you cover the earth science part then the students will not do as well if the test covers more earth science. OR vice versa. Please quit making it harder and harder for teachers to actually do their job. The school board and principals should be the ones responsible for making sure their teachers are doing a good job. Knowing and understanding what they are teaching and how well they are doing it. They can look at the materials and observe the teachers to see that they are covering the GLE's and State Standard materials to be taught.

Thank you

Kendra Asher

Parent, Teacher, and concerned citizen

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Katnik, Paul

From: Diann Ulmer [Diann@scschools.k12.mo.us]
Sent: Tuesday, January 03, 2012 10:20 AM
To: ESEA Waiver
Subject: NCLB Waiver Request Comment

To Whom it may Concern:

The draft NCLB waiver proposal is too much, too fast and too vague. While it is important for the state of Missouri to investigate a possible waiver to NCLB, it should not be done in haste. Concerns, as outlined by MASA District Accountability Committee and I agree, are as follows:

- The DESE draft wavier request is a vague plan that has long-term implications for Missouri School Districts.
- Missouri's draft waiver request has no financial impact study attached to it.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
- The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake for a hastily prepared plan to be proposed without significant input and clarity.
- There is no reason for such quick action.

Thank you for your consideration..

Diann Ulmer, Ed.S.
 Superintendent

Scott City R-I School District

Our Mission: "Growing, Developing, and Graduating Leaders by Inspiring One Student at a Time"

3000 Main Street

Scott City, MO 63780

Phone. 573-264-2381

Fax.573-264-2206

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Katnik, Paul

From: Tony Watkins [twatkins@charleston.k12.mo.us]
Sent: Tuesday, January 03, 2012 12:09 PM
To: ESEA Waiver
Subject: ESEA Waiver

I feel very strongly that the best course of action is to delay submitting of the ESEA waiver request. There is a total state of confusion and uncertainty concerning the implementation of the proposal. We are jumping before we look and we do not need a "pass it before you know what is in it" scenario.

Tony Watkins, Superintendent
Charleston R-1 School District

Katnik, Paul

From: Jimmy Gehm [JGehm@pkwy.k12.mo.us]
Sent: Tuesday, January 03, 2012 1:20 PM
To: ESEA Waiver
Subject: Please consider....

The NCLB flexibility waiver undermines the progress being made incrementally. **DO NOT SUBMIT THIS APPLICATION.** YOU know more about what is good for education than the US Dept. of Education in DC. Use common sense---they don't.

Jimmy Gehm
PE/Health Teacher
Sorrento Springs Elementary School
Parkway School District

You cannot help people permanently by doing for them, what they could and should do for themselves.....Abraham Lincoln

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Katnik, Paul

From: DESE Communications
Sent: Tuesday, January 03, 2012 1:27 PM
To: ESEA Waiver
Subject: FW: Question regarding the NCLB Flexibility Waiver

From: Lanham, Geoff
Sent: Tuesday, January 03, 2012 12:56 PM
To: DESE Communications
Subject: Question regarding the NCLB Flexibility Waiver

I am inquiring about the NCLB Flexibility Waiver. My organization will be providing input into the waiver request. However what we would like to know is that once the information and input is received from outside sources and is put together into a document, will the public have time to comment on that document and will it be available to the public for viewing? While I know the deadline for input is fast approaching, I would like to be able to answer to members of my education committee with the Missouri Planning Council on Developmental Disabilities.

Geoff Lanham
Program Specialist II
glanham@mpcdd.com

Missouri Planning Council for Developmental Disabilities
1706 East Elm Street
Jefferson City, Missouri 65101
573-751-8214
573-526-2755 (FAX)
Visit us on the web at: www.mpcdd.com

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Katnik, Paul

From: BRAME, MICHAEL [MICHAEL.BRAME@slps.org]
Sent: Tuesday, January 03, 2012 1:34 PM
To: ESEA Waiver
Cc: BRAME, MICHAEL
Subject: NCLB waiver DON'T DO IT!

If Missouri's waiver application is approved, MSIP 5 would go into effect at the end of the 2011-2012 school year, two years earlier than allowed by Missouri statute. This timeline does not allow school districts with sufficient time to implement the provisions of MSIP 5.

Michael Brame
Physics Teacher
Roosevelt High School room 112 SLPS
3230 Hartford
St. Louis, Missouri 63118
314-776-6040

Katnik, Paul

From: Peggy Witt [pwitt@vp.k12.mo.us]
Sent: Tuesday, January 03, 2012 1:35 PM
To: ESEA Waiver
Subject: NCLB Flexibility Waiver

There are no resources or infrastructure to support many components of the plan.

Marjorie Witt
Valley Park School District

Katnik, Paul

From: Bockman, Kathryn [KBockman@ncsd.k12.mo.us]
Sent: Tuesday, January 03, 2012 1:41 PM
To: ESEA Waiver
Subject: NCLB Flexibility Waiver Request

After reviewing the draft version of Missouri's waiver request, I would like to submit a few concerns, as a large, rural district currently in Level 3 of School Improvement:

1. The request includes important, pertinent changes and improvements, yet the specific qualifications and procedures are not included--which could impact the process greatly.
2. What are the financial implications for LEAs? During budgetary times such as these, cost effectiveness is a great worry to many districts as well as the SEA.
3. What will be the measurement standards for teachers of Special Education students? Of non-Core area teachers?
4. Who will assume the cost of enhanced, intensive professional development for staff? Since PD monies are no longer available, how will districts provide PD to align with the standards in the waiver?
5. Performance events in state assessments are graded by hired professionals. How will the state fund this procedure?
6. There is no mention of altering Federal funding, such as Title I monies--what changes in federal funding will affect the changes necessary to increase student achievement?

Thank you for your attention and allowing input in this matter!

Katie Bockman

Katie Bockman
Assistant Superintendent
North St. Francois County R-1
300 Berry Road
Bonne Terre, MO 63628
573-431-3300

Katnik, Paul

From: Jennifer Granda [jgran@festus.k12.mo.us]
Sent: Tuesday, January 03, 2012 2:01 PM
To: ESEA Waiver
Subject: NCLB Waiver

I am opposed to the NCLB Flexibility Waiver for many reasons.

Compensation should not be based on evaluation results nor should evaluations be tied to student achievement data or any tests. A teacher can be an outstanding teacher but not have a group of students who are not great test takers. I am not naive enough to say there aren't some teachers out there who would "fudge" their students tests. What system would be used to evaluate teachers and test scores? Will it be the same for all districts?

Also there are no resource to support many parts of the plan. Does the state expect already strapped districts to pick up the tab again? How many times are there mandates that the districts have to pick up the cost at the expense of their students? It is not fair!

There are also too many unknown factors in the plan. The US Department of Education has not provided specific details regarding the waiver requirements and Missouri's plan does not provide enough critical information as well.

If the waiver is approved Missouri will have to implement MSIP5- 2 years before the Missouri statute allows. This would cause districts insufficient time to implement many of the provisions of MSIP5, hurting the students in the long run.

Please reconsider the waiver request as written.

Jennifer Granda
Kindergarten Teacher
Festus R-VI

Katnik, Paul

From: Gibson, Natalie [gibson@cr6.net]
Sent: Tuesday, January 03, 2012 2:14 PM
To: ESEA Waiver
Subject: MSIP 5

It is disappointing to see this organization acting so carelessly with the educational component of our state. There are numerous concerns with the waiver request, but for me it is the budgeting aspect. What will the impact on our budget be? I have not seen this anywhere in the documentation.

Natalie Gibson
Elementary Principal

Katnik, Paul

From: Carter, Missy [carter@cr6.net]
Sent: Tuesday, January 03, 2012 2:38 PM
To: ESEA Waiver
Subject: NCLB waiver

As a public school teacher, I am requesting that you do not submit the waiver request in February. Please continue discussions with all stakeholders to craft a waiver request that will relieve districts from the sanctions of NCLB without incurring additional costs or accountability burdens.

Here are reasons to wait and continue discussing a plan:

1. The DESE draft waiver request is a vague plan that has long-term implications for MO School Districts.
2. Missouri's draft waiver request has no financial impact study attached to it.
3. MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013.
4. The draft waiver request appears to allow DESE to assume a "big brother approach" in which DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.
5. There is no reason for such quick action.

Katnik, Paul

From: Mark Brooks [mbrooks@hermann.k12.mo.us]
Sent: Tuesday, January 03, 2012 2:47 PM
To: ESEA Waiver

1-03-2012

To Whom It May Concern,

This letter is written to express our concerns with the NCLB waiver.

First, we would like to acknowledge the tremendous amount of effort and diligence it required to create this document. We would also like to recognize the honorable intent of the waiver as well. With these things being said even well intended ideas can go astray. The waiver is at its best a bloated set of typical educational plans that have been cobbled together to meet the needs of the federal government. It is filled with needless layers of new positions, titles, acronyms, and funding voids. These types of plans have plagued education for years.

We realize that this description is rather harsh but there is time yet to slow this process down before we saddle ourselves with a new set of regulations, requirements, vague positions, responsibilities and ramifications that are not yet fully understood.

Let us take just a few moments to recap what is currently going on in Missouri in the area of educational reform. A simple survey of current reform efforts yields: Race to the Top, Top 10 by 20, Common Core State Standards, Smarter Balanced Assessment Consortium, MSIP 5 all along with dozens of districts that have their own initiatives trying to keep themselves out of, or trying to get out of school improvement.

As we race headlong down the reform highway even your waiver plan acknowledges the need for more reflection and consideration. I think we all agree that professional development is a necessary part of any new proposition. Why is it we need a NCLB waiver to see the need for PD to support the transition to the common core state standards. I think the spring of 2012 might be a little late to support CCSS transition, especially with the Smarter Balanced Assessment Consortium field test scheduled for the 2013 – 2014 school year. The CCSS were released in June of 2010. The PD plan should have been ahead of any rollout. In the case of the CCSS the PD component found in the waiver adds to the patchwork effect that seems to be pervasion throughout the document.

The state can hardly support the RPDCs in the current funding climate. How will we be able to establish regional content specialists, recruit and train teacher leaders, or recruit and train administrators not to mention all of the ancillary and logistical expenses associated with the training and professional development?

System change is a complex and serious matter. It needs to be based on a well established set of needs or goals, planned carefully, incrementally enacted, and based on a clear timetable with room for flexibility. Evaluation of proposed changes after their implementation to judge their effectiveness is another hallmark of effective system change. The current set of initiatives seems like the perfect storm. They represent many challenges to the local districts and the state. Any one of them by themselves would represent a large undertaking. We believe if we do not slow down and control the tempo of proposed change it will not be a system change we will see but a system failure. Making AYP is difficult enough and no one in the state wants to jump from the frying pan into the fire.

As with the early CSIPs the NCLB waiver is filled with lofty goals but short on details. The SSOS is such an item. It sounds good. From the plan it seems that the SSOS is a new portion of DESE. Who will administer the SSOS? Who will man the SSOS? What tools will they use to identify the necessary PD? Will there be an approved list of researched based instructional strategies? Who will fund the SSOS? I find the same questions salient with the RSITs. As with most

educational plans we start layering with acronyms. In an attempt to make sure that not one stone is left unturned or one crack has not been filled we added PMs, IICs, and ISSs. All the acronyms might make this humorous but it is not. This is such a serious topic. More restraint should have been applied to the writing of the waiver.

Some components of the waiver are not yet complete and their final form is not yet known. The authors added the "growth model" to the NCLB waiver plan. To our understanding the pilot for the growth model is not even complete yet. We are not even certain which model the state is going to use if any. The new PBTE that is described is not complete. It seems from the waiver some state statutes are in jeopardy. The Missouri Tenure Act is just one. How we compensate teachers also seems to be in question. We are also somewhat concerned that the local control that most boards of education and community's prize is in question as well. "Big Brother DESE" seems to be a real possibility.

The timeline for implementation also seems rather drastic. As with most things associated with the federal government the governing portions of the waiver would start at the time of approval well before any changes mandated by MSIP 5.

When we read a plan that is well intended but is so filled with layers upon layers of rhetoric it is easy to become frustrated and a bit disillusioned.

- Please slow down.
- Let the reforms already in place work their way to completion.
- Streamline the plan so that all have a ready understanding and a recall of the components.
- Provide a voice to the stakeholders. Not after the fact but during the development phase of the waiver.
- Remove some of the jargon and educational gobbledygook that seems to infect such plans.
- Respect the current system and resources such as the RPDC's.
- Go easy with items that may end in wasteful litigation (Tenure Act, Teacher Compensation and so on).

Katnik, Paul

From: Josh Elmer [jelmer@mail.wccards.k12.mo.us]
Sent: Tuesday, January 03, 2012 3:15 PM
To: ESEA Waiver
Subject: NCLB waiver and MSIP 5

I am not sure that one voice counts, but this to me seems like the state wants to micro manage each school district. Each school district has a system in place that evaluates and oversees each individual school. I would be opposed to this passing.

Thank you

Katnik, Paul

From: Cunningham, Carol [ccunningham@spsmail.org]
Sent: Tuesday, January 03, 2012 3:41 PM
To: ESEA Waiver
Subject: NCLB Wavier Request

To Whom It May Concern,

I would like to voice my concerns over several items addressed on the waiver. The first is on Page 28 of the waiver application concerning teacher compensation based on evaluation results. I do not agree with this for several reasons.

The second concern I have is that I do not believe that teacher evaluations should be tied to student achievement data or tests as stated on Page 36 and Page 40 of the waiver. As a member of MSTA of Missouri, I also do not support the commitments of Race to The Top, or Top 10 by 2020. Please know that as a teacher, I don't believe that these are of benefit to our school children or it's staff.

Respectfully,

Carol Cunningham, Second Grade teacher

Katnik, Paul

From: Becker, Denise [becker@cr6.net]
Sent: Tuesday, January 03, 2012 8:04 PM
To: ESEA Waiver
Subject: NCLB Waiver Request

To Whom It May Concern:

I have taught kindergarten or first grade for twenty-four years. Education is under a microscope and being hit from all areas. I know changes need to be made but where is the money going to come from needed to make these changes and what kind of financial impact will these changes have on school districts. How are we going to pay for the "experts" who will come to help each school district? Will these people know the districts and their needs?

Education is not just a business. It involves teaching children how to grow and handle themselves in a world where caring and learning are not as prevalent as they used to be. Teachers are called upon to be more than just educators now more than ever. They are role models, nurturers, family; sometimes the only constant in a young child's life. History and algebra sometimes don't get taught. Please consider these ramblings of one professional

Sincerely,
Denise Becker
Kindergarten
Community R-VI

Katnik, Paul

From: Hensley, Melissa
Sent: Wednesday, January 04, 2012 8:32 AM
To: ESEA Waiver
Subject: FW: ESEA Waiver comment

From: Coffman, Robin
Sent: Tuesday, January 03, 2012 4:41 PM
To: Hensley, Melissa
Subject: ESEA Waiver comment

FYI.

Robin Coffman | Chief of Staff | 573.751.7602 | dese.mo.gov

From: Clark, Kayle
Sent: Tuesday, January 03, 2012 10:24 AM
To: Coffman, Robin
Subject: Dan Sample

Good morning Robin,

We received the following correspondence from Dan Sample regarding the NCLB waiver. I will let Mr. Sample know that we have passed his comments along.

Thank you!

Kayle Clark
 Constituent Services Liaison
 Office of Governor Jeremiah W. (Jay) Nixon
 P: (573) 751-8222 F: (573) 751-1495
 E: Kayle.Clark@mo.gov

Dan Sample
 30350 Peach Blossom Lane
 Lebanon, MO 65536

Email: SampleD@stoutland.k12.mo.us

Phone(s): (H) (417)533-5864

Activity Created: 12/20/2011

Governor:

I just read the entire waiver request from NCLB created by your Director of DESE. It is so apparent that she simply has taken her "canned" ideas and tried to justify them with federal guidelines. I went to the federal guidelines and the entire intent of Missouri's application is NOT THE SAME as requested by U.S. Department of Education. Problems include: Making teachers evaluations dependent on achievement scores, but NOT PRINCIPALS! Not examining improvement in scores instead of setting requirements for all students. I could not believe new teachers attempting to

get a professional certification could be denied because of achievement scores. This is not anything that President Obama or Arne Duncan were requesting! How many grass roots teachers were involved in this application? Has your office compared Missouri's application for waiver to that of other states. Open your eyes Governor...I believe you have some real problems ahead because of this waiver request. I believe it will receive low marks from the federal department of education.

Katnik, Paul

From: Abernathy, Laura - SMP [AbernathyL@fox.k12.mo.us]
Sent: Wednesday, January 04, 2012 8:39 AM
To: ESEA Waiver
Subject: NCLB waiver request

To Whom it May Concern:

As a member of MSTA and a teacher at Fox C-6 school district, I am opposed to the waiver request for several reasons. First, if Missouri's waiver application is approved, MSIP 5 would go into effect at the end of the 2011-2012 school year, two years earlier than allowed by Missouri statute. This timeline does not allow school districts with sufficient time to implement the provisions of MSIP 5. Second, the U.S. Department of Education has failed to provide many specific details regarding the waiver requirements and Missouri's plan does not provide critical information. Finally, there are no resources or infrastructure to support many components of the plan. For these reasons, I ask you to reconsider your waiver request. This is not in the best interest of Missouri teachers.

Sincerely,

Laura Abernathy
Fourth Grade Teacher
Simpson Elementary
Fox C-6

Katnik, Paul

From: Hudspeth, Brenda - SMP/SHW [Hudspeth@fox.k12.mo.us]
Sent: Wednesday, January 04, 2012 9:12 AM
To: ESEA Waiver
Subject: Please Note

To Whom It May Concern:

As a member of MSTA and a teacher at Fox C-6 school district, I am opposed to the waiver request for several reasons. First, if Missouri's waiver application is approved, MSIP 5 would go into effect at the end of the 2011-2012 school year, two years earlier than allowed by Missouri statute. This timeline does not allow school districts with sufficient time to implement the provisions of MSIP 5. Second, the U.S. Department of Education has failed to provide many specific details regarding the waiver requirements and Missouri's plan does not provide critical information. Finally, there are no resources or infrastructure to support many components of the plan. **For these reasons, I ask you to reconsider your waiver request. This is not in the best interest of Missouri teachers.**

Sincerely,

Brenda Hudspeth
Simpson Elementary
Fox C-6

Katnik, Paul

From: Stephanie Monroe [info@tutorourchildren.org]
Sent: Wednesday, January 04, 2012 9:32 AM
To: ESEA Waiver
Subject: Comment on Missouri Waiver Application: Preserving Tutoring for Low Income Students

&nbs

p; January 4, 2011

Dr. Chris L. Nicastro

Commissioner of Education

Missouri Department of Elementary and Secondary Education

P.O. Box 480

Jefferson City, MO 65102

Dear Commissioner Nicastro:

Thank you for your continued leadership on behalf of Missouri's children and for your efforts to create an inclusive and transparent process for receiving comments from key stakeholders related to Missouri's Elementary and Secondary Education Act (ESEA) waiver application. The Tutor Our Children campaign is a national coalition created to give voice to low-income children and families. Our coalition includes a diverse set of stakeholders in Missouri, such as the Children's Education Council of Missouri, that have been working to strengthen and improve the Supplemental Educational Services (SES) program. As you may know, SES tutoring has been a vital lifeline for low income students and families across the state for over nine years.

We view the prospect of waivers from key provision of the ESEA as an opportunity to increase accountability for SES providers and improve state oversight and district-level implementation. Eliminating supplemental support for the 5,280 low-income students currently receiving services should not be considered.

Despite even the most aggressive efforts, research shows that school turnaround efforts take at least five years before students show any meaningful improvement. As the draft of Missouri's waiver application states,

“Students cannot wait for incremental improvement in their educational conditions. Given the trends of low performing districts and the lack of district systems to sufficiently respond, targeted and rapid intervention is necessary for improved and sustainable student learning.”

Supplemental tutoring offers parents the opportunity to receive direct support from private tutors or community-based organizations while state and district leaders work to improve schools and districts. A U.S. Department of Education study released in March shows that supplemental tutoring leads to significant gains in student achievement in math and reading.[1]

As you may know, prominent members of Congress have been working diligently to strengthen the tutoring provisions throughout the reauthorization of ESEA. U.S. Senator John McCain (R-AZ) introduced the Tutoring

for Students Act to preserve SES tutoring in ESEA reauthorization. A bipartisan coalition of Congressmen introduced a similar bill in the House. These bills would preserve tutoring while empowering states through a state-level grant program and improve tutoring services by instituting stronger oversight of tutoring providers.

The goal of waiver-initiated changes to the SES program should be to increase state oversight, ease district program administration, enhance quality and accountability of providers, and enable parents to select providers which are best suited for needs of their child. Such enhancements would build on an existing research-based program to help more low-income students reach proficiency while forcing providers to show strong results in increasing student achievement.

We offer the following detailed recommendations for the State's waiver application, to ensure that only the most effective providers may serve students in Missouri, while ensuring that districts maintain SES participation levels to ensure that vital support is not eliminated for students trapped in failing schools.

Remove the requirement that LEAs spend an amount equal to 20% of its local allocation under subpart 2 of Title I, Part A [Allocations].

During the 2009-10 school year, nearly 5,300 students participated the states SES tutoring program. Missouri's waiver application should provide districts with the option of maintaining enrollment at the FY10 levels, or an average of FY08, FY09, and FY10. In exchange for the flexibility to cap SES enrollment levels based on historic data, the Missouri Department of Elementary and Secondary Education could require that each LEA submit an application, including:

- *A description of how the LEA will use not less than 90% of the funds it receives to enable eligible students to receive high quality academic tutoring (selected by parents from among a list of providers approved by Missouri).*
- *A description of how the LEA will provide at least annual notice to parents of the availability of high quality academic tutoring and the identity of approved providers (including qualifications and demonstrated effectiveness of such providers).*
- *A description of the process the LEA will use to develop agreements with providers which must include specific achievement goals and how parents and teachers will be regularly informed of progress.*
- *An assurance that the LEA will allow providers to use school facilities to deliver high quality academic tutoring (either free of charge or for a reasonable fee).*
- *A description of how (in cases where it is not possible to have all providers provide high quality academic tutoring in an LEA's school buildings) the LEA will select providers, taking into consideration input from principals, in a manner that provides parents with as diverse and large a group of on-site providers as possible.*
- *In the case of an LEA which is approved by Missouri as an eligible provider, a description of how the LEA will ensure a fair and transparent process in the administration of the high quality academic tutoring program.*
- *A description of the LEA's plan to inform eligible students of the availability of high quality academic tutoring which includes posting the common statewide student application on the agency's website; conducting enrollment of eligible students throughout the year; and ensuring high quality tutoring services are provided in a timely manner.*

Reallocation of Funds – Funds not obligated by an LEA must be reallocated to LEAs with approved applications

Provide for state control of funds; LEAs would apply to the State for tutoring funding.

Missouri Reservation of Funds – Missouri would target 20% of the funds it receives under subpart 2 of Title I, Part A [Allocations] to carry out a system of high quality academic tutoring to eligible students. Under the proposed system, Missouri would:

- Reserve up to 3% of such funds for administration, monitoring, evaluation, and technical assistance (including the development of a process for the selection and removal of providers); and
- Allocate not less than 97% of such funds to eligible LEAs to carry out high quality academic tutoring.

Raise the bar on provider quality by developing and implementing a system to evaluate each approved provider based on the extent to which a provider improved student academic achievement as well as LEA evaluations, student, parent, principal, and/or teacher satisfaction.

Providers of High Quality Academic Tutoring – In order for a provider (which may include a non-profit entity, a for-profit entity, or an LEA) to be included on the Missouri-approved provider list it must:

- Provide parents and the LEA with information on the progress of the children in increasing achievement;
- Ensure that instruction provided and content used is consistent with the instruction provided and content used by the LEA and aligned with State academic standards;
- Meet all applicable Federal, Missouri, and local health, safety, and civil rights laws; and
- Demonstrate that it meets the following minimum requirements:
 - Evidence that its curricula are aligned to Missouri Model Curriculum;
 - Evidence that it has at least five years of continuous operating experience providing education instruction to youth;
 - Evidence that it uses instructional methods and materials that are research-based;
 - Demonstrate financial stability (which may include a financial audit, evidence of sufficient working capital, or other means); and
 - Employ tutors that meet Missouri-determined qualifications.

Eliminate SES requirements for public charter schools.

The SES tutoring program should provide a lifeline for students in failing public schools, with limited or no viable transfer options. As schools of choice, charter schools should not be subject to the same requirements. Students have the opportunity to transfer out of poor performing charters; and authorities have the ability to shut down low performing charters.

Again, I would like to again thank you for the opportunity to share our guidance improvements with you. Over the years, we have seen time and time again that these services can make a world of difference in the lives of students that would otherwise not have access to additional instructional support.

If you have any questions or would like to discuss in more detail, please feel free to contact me at (301) 520-5534.

Sincerely,

The Honorable Stephanie Monroe

cc: Jennifer Davies, UrbanFUTURE; Brandy Thornton, W.E.B. DuBois Learning center

[1] U.S. Department of Education, "Supplemental Education Services and Student Achievement in Five Waiver Districts," p. xviii, March, 2011.

This message was sent to esea@dese.mo.gov from:

Tutor Our Children | 412 First, Street, SE | Washington, DC 20003

[Unsubscribe](#)



Katnik, Paul

From: Clint Hall [hallshistory@gmail.com]
Sent: Wednesday, January 04, 2012 9:49 AM
To: ESEA Waiver
Subject: NCLB Waiver

I am against the NCLB waiver because of the commitments that go along with filing for it. I am a teacher, MSTA member, and a registered voter. Please do not file the waiver.

Thank you,
Clint Hall

Katnik, Paul

From: Furrer, Cherri - SMP [FurrerC@fox.k12.mo.us]
Sent: Wednesday, January 04, 2012 10:52 AM
To: ESEA Waiver
Subject: NCLB legislation

To Whom It May Concern:

As a member of MSTA and a teacher at Fox C-6 school district, I am opposed to the waiver request for several reasons. First, if Missouri's waiver application is approved, MSIP 5 would go into effect at the end of the 2011-2012 school year, two years earlier than allowed by Missouri statute. This timeline does not allow school districts with sufficient time to implement the provisions of MSIP 5. Second, the U.S. Department of Education has failed to provide many specific details regarding the waiver requirements and Missouri's plan does not provide critical information. Finally, there are no resources or infrastructure to support many components of the plan. For these reasons, I ask you to reconsider your waiver request. This is not in the best interest of Missouri teachers.

Sincerely,

Cherri Furrer
Third Grade Teacher
Simpson Elementary
Fox C-6

Katnik, Paul

From: Ellsworth, Tina Marie [TinaEllsworth@ku.edu]
Sent: Wednesday, January 04, 2012 11:15 AM
To: ESEA Waiver
Cc: Gerling, Bill
Subject: ESEA Proposal

To Whom It May Concern:

Your website says, "Based on feedback we've received, we have made changes to our draft waiver and have extended our public comment period beyond the initial January 5 deadline." Could you please let us know what the new deadline is?

Tina M. Ellsworth
Missouri Council for the Social Studies, President Elementary Social Studies Methods
Instructor University of Kansas J.R. Pearson Hall # 110 Lawrence, KS 66045
816.686.4689
TinaEllsworth@ku.edu<<mailto:TinaEllsworth@ku.edu>>

Katnik, Paul

From: Carter, Susan [scarter@bolivarschools.org]
Sent: Wednesday, January 04, 2012 1:15 PM
To: ESEA Waiver
Subject: waiver

Please do not pass this legislation!!!!

Thank you!

Susan Carter
Spanish I and Environmental Science Teacher

Katnik, Paul

From: Ellsworth, Tina Marie [TinaEllsworth@ku.edu]
Sent: Wednesday, January 04, 2012 2:35 PM
To: ESEA Waiver
Subject: RE: ESEA Proposal

Thank you for your response. I am unclear then as to when the proposal is set to go to the State Board of Education. Originally it was set for January 17. Is that no longer going to happen since this is now "open-ended" and has no deadline?

Thank you for your time,
 Tina M. Ellsworth
 Missouri Council for the Social Studies, President Elementary Social Studies Methods
 Instructor University of Kansas J.R. Pearson Hall # 110 Lawrence, KS 66045
 816.686.4689
TinaEllsworth@ku.edu

From: ESEA Waiver [ESEA@dese.mo.gov]
Sent: Wednesday, January 04, 2012 2:31 PM
To: Ellsworth, Tina Marie
Subject: RE: ESEA Proposal

Good Afternoon.
 There has been no deadline set. As of now, it is open-ended.

Thank you.

-----Original Message-----

From: Ellsworth, Tina Marie [<mailto:TinaEllsworth@ku.edu>]
Sent: Wednesday, January 04, 2012 11:15 AM
To: ESEA Waiver
Cc: Gerling, Bill
Subject: ESEA Proposal

To Whom It May Concern:

Your website says, "Based on feedback we've received, we have made changes to our draft waiver and have extended our public comment period beyond the initial January 5 deadline." Could you please let us know what the new deadline is?

Tina M. Ellsworth
 Missouri Council for the Social Studies, President Elementary Social Studies Methods
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 816.686.4689
TinaEllsworth@ku.edu<<mailto:TinaEllsworth@ku.edu>>

Katnik, Paul

From: LeCompte, Jill [jlecompte@cassville.k12.mo.us]
Sent: Wednesday, January 04, 2012 2:48 PM
To: ESEA Waiver
Subject: NCLB Waiver

Dear DESE,

Please consider not submitting a NCLB waiver request in February. As a member of the Cassville R-IV administrative team, I ask that you organize to continue discussions with all stakeholders to craft a waiver request that will relieve us from the sanctions of NCLB. Please do not hastily submit the waiver. Many issues will evolve with a premature decision to submit the NCLB waiver, such as: the draft/plan that we viewed is too fast and too vague with long term implications for Missouri schools; the draft waiver request has no financial impact study attached; MSIP 5 would go into effect now rather than in 2013; DESE will determine the evaluation system each school district will use; there is no reason for such a quick action; and we do not want a repeat of the MSIP plan the State Board took without input from stakeholders.

Please do not submit the NCLB waiver in February.

Sincerely,

Jill LeCompte

Director of Instruction

Cassville R-IV Schools

Katnik, Paul

From: Ellsworth, Tina Marie [TinaEllsworth@ku.edu]
Sent: Wednesday, January 04, 2012 2:51 PM
To: ESEA Waiver
Cc: Gerling, Bill
Subject: RE: ESEA

To Whom It May Concern:

I'm not sure if the previous email was intended to answer my question or not, but my question remains. My initial question was regarding a deadline for comments. The previous answer was that there was no deadline, but that comments are going to be accepted indefinitely. I followed up with inquiry as to whether or not the waiver would be sent to the state BOE in Mid January and the response was "The Department of Elementary and Secondary Education appreciates your feedback on the draft proposal of the No Child Left Behind Flexibility Waiver. All comments and suggestions will be reviewed and considered in the development process of the final draft. For questions submitted, please continue to revisit the ESEA Flexibility FAQ for updated responses on the No Child Left Behind Flexibility Waiver homepage:<http://www.dese.mo.gov/qs/esea-waiver.html>"

I went to your website and this is what I saw that initiated the line of questioning to begin with:

"What is the process for completing and submitting Missouri's ESEA Flexibility Waiver application? Submitting Missouri's intent to apply on October 5, 2011 was the first step of this process. Information is being gathered in respect to the three main principles that must be addressed as a part of the formal application. A first draft of the application is set to be completed and presented to the State Board of Education at its December 1-2 meeting. Through December and January, ongoing review and modification of the application will take place, including stakeholder input. Should the determination be made to officially apply for the waiver, formal approval by the State Board of Education will be requested in January prior to submission in mid-February, 2012."

So is there a date set for when comments will no longer be allowed because the proposal will be sent to the BOE? When will it be sent to the BOE?

I went ahead and copied and pasted our previous email exchange in case there are multiple people answering these emails. Thanks for your time,

Tina M. Ellsworth
 Missouri Council for the Social Studies, President Elementary Social Studies Methods
 Instructor University of Kansas J.R. Pearson Hall # 110 Lawrence, KS 66045
 816.686.4689
TinaEllsworth@ku.edu<<mailto:TinaEllsworth@ku.edu>>

From: ESEA Waiver [ESEA@dese.mo.gov]
Sent: Wednesday, January 04, 2012 2:35 PM
To: Ellsworth, Tina Marie
Subject: ESEA

The Department of Elementary and Secondary Education appreciates your feedback on the draft proposal of the No Child Left Behind Flexibility Waiver.

All comments and suggestions will be reviewed and considered in the development process of the final draft. For questions submitted, please continue to revisit the ESEA Flexibility FAQ for updated responses on the No Child Left Behind Flexibility Waiver homepage:

<http://www.dese.mo.gov/qs/esea-waiver.html>

From: Ellsworth, Tina Marie
 Sent: Wednesday, January 04, 2012 2:35 PM
 To: ESEA Waiver [ESEA@dese.mo.gov]
 Subject: ESEA

Thank you for your response. I am unclear then as to when the proposal is set to go to the State Board of Education. Originally it was set for January 17. Is that no longer going to happen since this is now "open-ended" and has no deadline?

Thank you for your time,
 Tina M. Ellsworth
 Missouri Council for the Social Studies, President Elementary Social Studies Methods
 Instructor University of Kansas J.R. Pearson Hall # 110 Lawrence, KS 66045
 816.686.4689
TinaEllsworth@ku.edu

From: ESEA Waiver [ESEA@dese.mo.gov]
 Sent: Wednesday, January 04, 2012 2:31 PM
 To: Ellsworth, Tina Marie
 Subject: RE: ESEA Proposal

Good Afternoon.
 There has been no deadline set. As of now, it is open-ended.

Thank you.

-----Original Message-----

From: Ellsworth, Tina Marie [<mailto:TinaEllsworth@ku.edu>]
 Sent: Wednesday, January 04, 2012 11:15 AM
 To: ESEA Waiver
 Cc: Gerling, Bill
 Subject: ESEA Proposal

To Whom It May Concern:

Your website says, "Based on feedback we've received, we have made changes to our draft waiver and have extended our public comment period beyond the initial January 5 deadline." Could you please let us know what the new deadline is?

Tina M. Ellsworth
 Missouri Council for the Social Studies, President Elementary Social Studies Methods
 Instructor University of Kansas J.R. Pearson Hall # 110 Lawrence, KS 66045
 816.686.4689
TinaEllsworth@ku.edu<<mailto:TinaEllsworth@ku.edu>>

Katnik, Paul

From: Michelle Sledge [msledge@mail.wccards.k12.mo.us]
Sent: Wednesday, January 04, 2012 3:10 PM
To: ESEA Waiver
Subject: waiver

There are so many things wrong with the NCLB waiver, I don't even know where to begin. Period. If I understand correctly, teachers would be paid based on student achievement. ARE YOU KIDDING ME????? I work in a high SPED population building with more poverty than most and less parental support than most. For my kids, some days are spent meeting their basic needs and not much more. Are you really telling me that if these kiddos don't score proficient on the stupid MAP test, our pay could be docked? We are trying so hard to meet ALL the needs of EVERY kiddo, and, in our building, the needs are great outside this building.

Now, I am not and have never been a fan of NCLB. I think it is completely and totally unreasonable to assume all kids can be proficient. Some children will be functional at best and the MAP-A is a measure of teacher knowledge, not child knowledge. The whole system is messed up when it comes to that. I guess my name will automatically be attached to this email, so I hope it doesn't come back to bite me.

From what I had time to read (and it wasn't as much as I would like) it seems to me that this waiver needs some work on several levels. I really didn't talk about much, but I think you will get the idea. I think someone needs to come down and spend a little time in the education real world instead of sitting up in an office and see what it is teachers really do each day.

Katnik, Paul

From: Cheryl Compton [ComptonC@ritenour.k12.mo.us]
Sent: Wednesday, January 04, 2012 3:16 PM
To: ESEA Waiver

Feedback on Waiver draft:

Page 2 - The last paragraph states that curricula will be developed for Fine Arts, Health, and PE. No where does it state that we currently have a curriculum for each of these areas, leaving the impressions we are just beginning work in these areas.

Page 3 - This talks about alignment and transition to the core standards, but does not state when the standards will go into effect. Later on in the document there are references to flexibility in adopting more rigorous standards than the core standards, if alignment is maintained. This needs to be clarified and a clear statement of when core standards will be in effect.

Page 5 - Having only 2 districts as implementation sites for 2 years, is a long term investment in too small of a sample size for the number of districts in the state. Success in one urban and one suburban district does not mean success in replication across the state, without a larger sample.

Page 7 - Under school leaders there is nothing specific. This really doesn't say anything in clear, specific terms.

Page 16 - Again, this is vague. We're going to use process standards, but then state that the criteria we're using is difficult to qualify. This needs to be much more specific.

The document state we will move to one accountability system, the APR. It is unclear as to why there would be process standards if we are only using the APR. The APR is not a big picture view, but targets specific indicators, several of which are not indicators of a successful school district. A waiver should include a broader, unbiased look at a school district.

The MSIP 5 process did seek input across the state, but very minimal changes were made based on the input.

Page 40 - How can DESE insure no student will have an ineffective teacher for more than one year? It should be a goal for every district, but writing in a waiver that the state will insure this without a specific plan is setting the program up for failure. Is DESE planning to change tenure laws? If so, that should be part of the document.

Page 41 - Letting go of the most recent hires goes against all the principles of the document. When new teachers are hired to replace teachers who have had difficulties, why would districts release those teachers first?

Page 42 - What would be the process for DESE approving district evaluation systems? It seems there would be financial implications associated with setting up a system to review and approve evaluation systems. DESE doesn't have enough staff to maintain its current functions. Having districts align with state standards on an evaluation system could work, but not having to go through the state for approval. Are we moving toward one state-wide district? It seems rather than supporting the work of districts, DESE's taking the stand of micro-managing school districts. Where is local control in this process.

With the approval of this waiver MSIP 5 would go into effect rather than the current phase-in process. There are still a number of flaws with MSIP 5 and things that need to be complete before implementation. Phase-in should be part of the waiver plan.

There is no mention of how to fund the plan outlined. Currently there is not enough money for the formula, which will take most, if not all of the legislative session to work out. We are not asking for a waiver with no funds for implementation. How can that work?

Thank you for the opportunity to provide feedback.

Katnik, Paul

From: Russell Brock [rbrock@dutchmen.us]
Sent: Wednesday, January 04, 2012 3:19 PM
To: ESEA Waiver
Subject: Comments regarding NCLB Waiver Draft # 2

To Whom it May concern:

After reviewing Draft # 2 for the NCLB Waiver application, I would like to express a few concerns.

I think we need some of the details worked out first before we submit an application. Scoring guides, for example, need to be determined and part of the plan. For teacher evaluations, what does "preponderance" mean? 51%? I think we need the whole process for teacher and principal evaluations established in detail. I am also wanting more detail concerning the training that will be required for those doing teacher evaluations. How will that evaluation certification be determined? This plan also appears to place a lot of additional responsibility on DESE, and I am concerned that based on current staffing, DESE will not be able to take on all the additional work that will be part of this waiver.

I may be surprised, but I would not think the U.S. Department of Education would approve a plan like this without more specific details. If we really want this waiver to be approved, I think we need to work out many more details about how this will work and whose responsibility it will be. I am uncomfortable about the details being worked out later, or even approved by the State Board at the same meeting that the waiver is approved.

Finally, I am not sure but waiting for NCLB to be reauthorized might be better in the long run. I would rather do that and take our chances than to rush a Waiver plan for approval and not have thought through the implications carefully enough and end up with something worse than what we had.

Those are my concerns. Thanks for the opportunity to express them.

--
Russ Brock, Ed.D
Superintendent
Gasconade County R-2 School District
P.O. Box 536
Owensville, MO 65066
573-437-2177
573-437-5808 Fax

Katnik, Paul

From: Melissa Langston [mlangston@mail.wccards.k12.mo.us]
Sent: Wednesday, January 04, 2012 3:20 PM
To: ESEA Waiver
Subject: NCLB Waiver

I have concerns about the NCLB waiver that DESE is considering. First, by accepting the waiver, we institute MSIP5 two years earlier. In my district, we do not have nearly enough resources to deal with that; I am certain other districts are in the same financial position. I am aware that DESE has no plan and no funding to remedy that situation. Local districts cannot afford to foot the bill for the enormous requirements that would be put upon them, causing us to fail from the start.

I also do not support teacher evaluations being based on student performance. I teach in a school that continues to meet our NCLB goals, but by nationalizing tests and evaluations, control is taken away from districts, parents, and teachers in the education of the students, yet teachers would still be evaluated for the performance. Even though performance evaluation would be "optional" for school districts, it's likely to become mandatory if the option is already there. I hope you will consider these items before signing the waiver into effect.

Sincerely,
Melissa Langston
Webb City R-7 teacher

Katnik, Paul

From: Brenda Miller [bquick83@hotmail.com]
Sent: Wednesday, January 04, 2012 3:23 PM
To: ESEA Waiver
Subject: oppose NCLB waiver

To Whom It May Concern:

I am an educator with the Mansfield R-IV district that opposes the NCLB waiver. There are many details not lined out from the state as to the changes that would follow. Actions by Congress will likely overturn the waiver plan. There are no resources to support many components of the plan.

As a member of MSTTA, there are also certain provisions that my organization opposed in the Race to the Top application that DESE would be allowed to carry out with the waiver.

I am in opposition to the waiver application.

Respectfully yours,

Brenda Miller
Wilder Elementary
Mansfield R-IV

Katnik, Paul

From: 1SG 901 [sattaway@mail.wccards.k12.mo.us]
Sent: Wednesday, January 04, 2012 3:47 PM
To: ESEA Waiver
Subject: Opposition to MO NCLB Waiver Application

Good Afternoon,

As a teacher and a member of MSTA, I would like to voice my opposition to the Missouri NCLB Waiver Application for the following reasons:

1. If Missouri's waiver application is approved, MSIP 5 would go into effect at the end of the 2011-12 school year, two years earlier than allowed by Missouri statute. This timeline does not allow school districts with sufficient time to implement provisions of MSIP 5.
2. Congress is likely to reauthorize ESEA, overturning the waiver plan and enacting new requirements.
3. At face value, the concept of the waiver sounds appealing. However, there are too many "unknown" factors. The United States Department of Education has failed to provide many specific details regarding the waiver requirements and Missouri's plan does not provide critical information.
4. Missouri's draft application allows the Department of Elementary and Secondary Education to carry out certain provisions MSTA opposed in the Race to the Top application.
5. While the application suggests a statewide teacher and principal evaluation system that "may" be used by districts, it's likely that the system will become mandated at some point. At a minimum, the state plans to mandate evaluation guidelines.
6. There are no resources or infrastructure to support many components of the plan.

Thank you for your time,
Stephanie Attaway

1SG(R) Stephanie M. Attaway
Army Instructor
Webb City High School JROTC
621 N. Madison, Ave.
Webb City, Mo 64870
417-673-3250
Fax: 417-673-6025

"Whether you think you can or think you can't, you're probably right."
Henry Ford

Katnik, Paul

From: Stevson, Diane [dstevson@bolivarschools.org]
Sent: Wednesday, January 04, 2012 3:48 PM
To: ESEA Waiver
Subject: concerns

I am concerned about the NCLB Waiver. As a Special Education teacher, I am opposed to the drive towards linking teacher compensation to evaluation results. I am also opposed to linking teacher evaluation to student achievement data. The students I work with make measurable progress, but in a way that I fear would not be taken into account were these measures put into place.

Sincerely,
Diane L. Stevson

Katnik, Paul

From: Stacy Hollingsworth [shollingsworth@mail.wccards.k12.mo.us]
Sent: Wednesday, January 04, 2012 3:58 PM
To: ESEA Waiver
Cc: Stacy Hollingsworth
Subject: NCLB Waiver

I would like to express my opposition to the NCLB Waiver proposal. It has many flaws that must be reconsidered to help Missouri students receive the best quality education possible.

1. It is very vague with many necessary specifics excluded. Vague policies always have problems. I can not even add more to this statement due to the uncertain and deleted facts that are necessary to fully understand this proposal.
2. I find it hard to believe that the state must adopt a "one size fits all" mentality when Missouri schools are training our teachers to build relationships, assess skills, and differentiate instruction according to what the individual student NEEDS. Assuming that intercity schools and rural schools have the same needs, the same issues, the same strengths is wrong. I would hope our department of education is intelligent enough to realize that they must lead by example-- not say one thing but yet do another.
3. I would also hope that the state understands the many differences our children come to school with daily. External factors that do not happen during the school hours unfortunately do affect the child's ability to learn. Research confirms this time and time again. To want to tie a teacher's compensation and evaluation to the classes' test scores is unfair. Any teacher can show gains for students in their classroom but to expect teacher evaluation and pay to be based on test scores is ridiculous. I do not see doctor's pay based on the percent of lives saved within a time frame-- or a lawyer's compensation measured by how many cases he/she has won. We are professionals. We take pride in helping all children succeed-- but a state test score is not a fair measurement of a student's success. Likewise we EDUCATE ALL. Unlike the business world, we do not have a standard for our incoming product. In the business world, if the standard is higher than the product-- it is thrown away, put into the discard pile, removed and not used for that purpose. In public education this is one of our strengths! We take all no matter what! We work hard with what we are given and develop, inspire, create, and encourage. How insulting to think that people at the state level just care about a number on a test~
4. Local communities better know the needs, strengths, and challenges facing their community. I am saddened to think that the state feels the need to tell us how to evaluate teachers. I am proud to be a Missouri principal, educator, parent, and community member. I rest assured that my district strives to help meet the social, physical, emotional, and educational needs of all students daily! Shame on any organization in America that does not realize the value in developing the whole child, in encouraging effort and praise, in promoting individual goals, in developing God given talents, in training students for a future job market that is uncertain, in molding the next generation of leaders to continue bettering the community in which they live! All those things can not be measured by more state mandates, a state blanketed evaluation system, or a state test score.

Thank you,

Stacy Hollingsworth

Katnik, Paul

From: Howard, Erin [ehoward@bolivarschools.org]
Sent: Wednesday, January 04, 2012 4:12 PM
To: ESEA Waiver
Subject: I oppose Missouri's NCLB waiver

I oppose Missouri's NCLB waiver application for the following reasons:

1. If Missouri's waiver application is approved, MSIP 5 would go into effect at the end of the 2011-12 school year, two years earlier than allowed by Missouri statute. This timeline does not allow school districts with sufficient time to implement provisions of MSIP 5.
2. Congress is likely to reauthorize ESEA, overturning the waiver plan and enacting new requirements.
3. At face value, the concept of the waiver sounds appealing. However, there are too many "unknown" factors. The United States Department of Education has failed to provide many specific details regarding the waiver requirements and Missouri's plan does not provide critical information.
4. Missouri's draft application allows the Department of Elementary and Secondary Education to carry out certain provisions MSTAs opposed in the Race to the Top application.
5. While the application suggests a statewide teacher and principal evaluation system that "may" be used by districts, it's likely that the system will become mandated at some point. At a minimum, the state plans to mandate evaluation guidelines.
6. There are no resources or infrastructure to support many components of the plan.

Thank you,

Erin Howard
BIS Physical Education
8th Grade Volleyball Coach
District Wellness Coordinator
Bolivar R-1 "Where Kids Are First"

Katnik, Paul

From: Brenten Byrd [bbyrd@mail.wccards.k12.mo.us]
Sent: Wednesday, January 04, 2012 4:13 PM
To: ESEA Waiver
Subject: I oppose the NCLB waiver

School districts will not be able to implement the provisions of MSIP 5 by the end of this school year.

You would be signing off on something that is unknown. There are no specific details on the waiver requirements and you would be setting us up for failure, which we lead to us failing the students of Missouri.

I oppose compensation based on evaluation results, and teacher evaluations being tied to student achievement data and/or high-stakes testing. Each district should be able to create an evaluation tool to evaluate their teachers it should not be put in the hands of people who do not work with KIDS and teachers on a daily basis.

With the already tight budgets and all of the cuts that are already making our jobs difficult how do you expect to pay for the for the resources or infrastructure to support the components of the plan.

Please do not close your eyes and jump off a cliff then try to come up with a plan as you are falling. Take a step back and think about the kids. Teachers plates are full and if you keep adding to it they are going drop everything and run. Students in Missouri are lucky to have so many educators and government officials who care about them and their future successes, but they need you to stand up for them and the people who educate them.

You have the future of Missouri in your hands please do not make a mistake that you will regret!

Thank you,

Brenten Byrd, Principal
Harry S. Truman Elementary
bbyrd@mail.wccards.k12.mo.us

Katnik, Paul

From: Cory McMahon [cjmc404@hotmail.com]
Sent: Wednesday, January 04, 2012 5:40 PM
To: ESEA Waiver
Subject: Extention of NCLB Waiver comment period

To Whom It May Concern:

I understand that the comment period for Missouri's second draft application for the NCLB Waiver from the U. S. Department of Education has been extended. When does the NCLB Waiver comment period end?

Sincerely,

Cory McMahon

Katnik, Paul

From: Beverly Walley [dgwily68@yahoo.com]
Sent: Wednesday, January 04, 2012 9:12 PM
To: ESEA Waiver
Cc: Beverly Walley
Subject: Waiver applied for regarding testing, etc.

As a retired educator in the state, I have many concerns regarding teacher evals tied to test results. First of all, comparing last year's class to this year's class is comparing apples to oranges. Second, all educators know that no two classes are the same. One year, a teacher may have a gifted class in that all the gifted kids in a grade are usually placed in the same class due to scheduling. The next year, this same teacher may have all average to low students as they do not have the gifted class that year. Third, what happens to the teacher who has a disproportionately high number of ESL kids one year and few the next? What happens to the "specials" teachers-art, music, and PE? What is their "raise" based on? And lastly, what about the special education teachers who love those kids, choose to work with them, and see the progress in spurts or sporadically and then mostly below grade level? And then, what about the personality issues when principals bring judgement to the table? Even now, they are discouraging teachers, ruining teachers, and destroying lives and dreams. Is this all in the name of progress?? I think not. As a second generation teacher with a daughter who is the third generation, what will become of our children, this state and our country if this nonsense does not come to a screeching halt. Thank you, George W. Bush. Please help us get back on track.
Beverly Walley, retired educator

Katnik, Paul

From: Deblin Thomas [debthomas1201@sbcglobal.net]
Sent: Wednesday, January 04, 2012 9:37 PM
To: ESEA Waiver
Subject: No Child Left Behind Waiver

To Whom it may concern,

I am against this waiver. I do not think it would be fair to All employees. You have to look at the Big picture, especially in urban districts working with at risk children. Please look at the geographics. a Collect the data on: student attendance, parent participation, suspensions, youth pregnancy, free and reduced lunches, class enrollment, supplies (books, paper, etc.), staff/administration transition, degrees and qualification. All of these have a lot to do with student performance and Teachers being able to reach a student academically.

Intelligence plus character--- that is the goal of true education. 
..... Dr. Martin Luther King Jr.

Katnik, Paul

From: James Sigler [JSigler@cj.k12.mo.us]
Sent: Wednesday, January 04, 2012 10:13 PM
To: ESEA Waiver
Subject: NCLB waiver comments

Dear DESE,

I am very concerned about the impact on Missouri education from the No Child Left Behind waiver. The waiver does not come without big string attached...a big unfunded mandate from the federal government that takes control away from local school districts.

1. MSIP 5 will be implement at the end of this school year. That is 2 years earlier than allowed by statute. In addition, the requirements from the US Department of Ed are vague in the changes that will have to happen to MSIP5. That sounds like a poorly planned rush job.
2. Teacher evaluations will be tied to standardized test data. Standardized test data is intended to measure student knowledge. The use the data for a purpose other than it was intended, like evaluating the teacher, is not valid. In addition, test data has inherent limitations that question its validity in measuring student learning, let alone a teacher's instruction. There is compelling evidence of correlation between student standardized test scores and student social-economic status. There is not compelling evidence of a correlation between student standardized test scores and teacher effectiveness. Tying test scores to teacher evaluations does not work.
3. Many of the same requirements in the waiver were in the federal Race to the Top program, except this time, the requirement come without the money. There is already a big hole in the Missouri budget, and we don't need more required changes that will drain away more money from Missouri schools. The requirements were bad for Missouri then, and they are even moreso, now.

Thanks,

James Sigler
3rd grade teacher www.siglersite.com

Katnik, Paul

From: ben counce [bcounce@sbcglobal.net]
Sent: Thursday, January 05, 2012 6:44 AM
To: ESEA Waiver
Subject: Flexibility Waiver

To whom it may concern:

I am very disappointed in the current position the fine arts hold in Missouri Schools. I am not a Missouri native, but am proud to be an immigrant. One of the big reasons I am proud of being a Missourian is the emphasis the education department has placed on educating the whole child through my history here. I have five children. None of them has become an opera star or famous musician, but I am so grateful for the music and art education they received in our public schools. Each of them has been active in the band and choir program. I feel this has given them so much confidence as well as appreciation for harmony in all areas of their life.

I haven't had time to really read the DESE proposal well, but have heard that this will phase out what little Music and Art programs we have left. Haven't you read the research about the way learning fine arts improves brain learning patterns? Today is the deadline, and I just do not have time to find the studies I am talking about to quote them. I can offer my five personal statistics as witnessed through my children. Music excites them and helps them learn other subject areas as well. Art has also had an influence on their lives. Please do not consider phasing out our Music and Art programs in the schools to favor strictly academic subjects. Study after study is showing the way that teachers can use Music and Art to help students learn subject matter.

Instead you should be encouraging classroom teachers to work with fine arts teachers to help students learn the academic matter.

Sincerely,
Lugenia Counce
573-333-5068
2034 Stonewall Dr.
Caruthersville, Missouri

Katnik, Paul

From: Julie Walker [juliewalker@mail.wccards.k12.mo.us]
Sent: Thursday, January 05, 2012 7:08 AM
To: ESEA Waiver
Subject: NCLB Waiver

As a Missouri educator, I would like to take this opportunity to express my concern and opposition to the NCLB waiver proposal as it is currently drafted. There are many "unknown factors" with the proposal, as well as a lack of specific details. It appears that the proposal is nothing more than a fast track to a new unfunded and unspecified program from the state. DESE has not offered much critical information regarding the effects of the proposal itself.

I'm most disturbed about tying standardized tests to teacher evaluations. A single evaluation procedure does not support the effectiveness of a teacher. We accept the responsibility for teaching "all" students who come into our classroom, but as we all know, students come in with varied economic, social, and educational backgrounds. Expecting one test to determine my abilities to teach students with such diverse backgrounds is unrealistic! High standards of teaching are expected and embraced, and our district certainly is a role-model for those high expectations, but I dread the day that my success or failure as a teacher is determined by a standardized test!

No funds connected with the waiver, plus minimal details, equals our local school district picking up the tab. This is an unacceptable equation! I ask you to reconsider the proposal as a consideration to our Missouri students and educators.

Thank you,

Julie Walker

Katnik, Paul

From: Candi Buckman [Buckman.Candi@wgmail.org]
Sent: Thursday, January 05, 2012 7:39 AM
To: ESEA Waiver
Subject: NCLB flexibility waiver

I am a teacher in the Webster Groves School District and a member of MSTA. I am opposed to this waiver.

Candice Buckman

Katnik, Paul

From: Crystal Robinson [carobinson@joplin.k12.mo.us]
Sent: Thursday, January 05, 2012 7:44 AM
To: ESEA Waiver
Subject: MSIP 5...

To whom it may concern:

I am opposed to the compensation based on evaluation results (pg. 28 of the Waiver application) and teacher evaluations tied to student achievement data &/or high-stakes tests (pp. 36 & 40). There are too many unknown factors. It also doesn't allow the districts any time to implement. I feel it should be reexamined regarding critical details that effect teachers lives.

Thank you.

Crystal Robinson
Read 180/Special Education
(417) 625-5270

Katnik, Paul

From: Eric Churchwell [churchwelle@palmyra.k12.mo.us]
Sent: Thursday, January 05, 2012 7:51 AM
To: ESEA Waiver
Subject: NCLB Waiver

The purpose of this email is to express my concerns regarding the No Child Left Behind (NCLB) waiver proposed by the Missouri Department of Elementary and Secondary Education (DESE). I believe that this waiver proposal is being rushed into and encompasses too much. The initiatives within this proposal are vague and should be discussed and explained in more detail so that all stakeholders will have an understanding of what the outcomes are and how they will affect all the public school students in Missouri. In addition to the vagueness, there is no financial analysis of how much it will cost local school districts to implement. Below are just a few items of concern that are mentioned in the waiver document.

- If the waiver is accepted by the federal government MSIP 5 will immediately go into effect which gives local school districts no time to prepare for changes.
- Project Managers, Instructional Improvement Coordinators, and Instructional Improvement Staff to help low performing districts are included in the waiver. What will these positions cost? Who will pay that cost?
- How will the requirement that local evaluation policies and procedures ensure that no student has been taught by an ineffective teacher apply to teachers that teach subjects that have no growth test?
- Will trained teacher evaluators be required? Who assumes the responsibility for the cost of the additional training?
- Does the waiver move to school level accreditation over district level accreditation?
- The waiver references that DESE will have the authority to review and approve district evaluation systems, compensation/tenure tied to evaluation results, protocols for RIF and nonrenewal linked to performance evaluation results, and equitable distribution of highly effective teachers to schools and students most in need. Does this take even more control away from local boards of education and give it to DESE.

These are just a few concerns that I feel need to be addressed before rushing into a waiver request that the public school students of Missouri will have to live with for years to come. If the federal government does reauthorize NCLB, will Missouri have to live under the waiver, even if the reauthorization is better for Missouri public school students? I urge you to slow down and don't just submit a waiver. Take time and wait until all stakeholders have an opportunity to gain understanding and give input on how the waiver will affect public school students across Missouri.

Eric Churchwell, Superintendent
 Palmyra R-1 School District
 1723 S. Main, P.O. Box 151
 Palmyra, MO 63461
 573-769-2066

Katnik, Paul

From: McDowell, Denise [dmcdowell@jackson.k12.mo.us]
Sent: Thursday, January 05, 2012 9:12 AM
To: ESEA Waiver
Subject: NCLB waiver

Please, please get more information before you agree with the NCLB waiver. We all agree the NCLB act is flawed and unattainable, but there is not enough info on what the waiver would make us do. Things could be worse! Please put real educators that are in the classroom now on your committee and listen to the people in the trenches.

In my 22 years of experience, we are leaving more children behind than ever, instead of improving education!

I oppose the MO NCLB waiver until we get further info from teachers!

Sincerely,

Denise McDowell

Katnik, Paul

From: Renae Eddy [reddy@caruthersville.k12.mo.us]
Sent: Thursday, January 05, 2012 9:34 AM
To: ESEA Waiver
Subject: FINE ARTS CONCERN

I am writing to express my concern about Missouri asking for forgiveness of the No Child Left Behind. It has been brought to my attention that this would greatly impact our fine arts program in our schools. I am urging you not to do anything that could cause our fine arts programs to be eliminated. Fine arts is a way that a lot of our students succeed past high school. A lot of students depend on Fine Arts scholarships to allow them to go to college. Fine arts is also a way that a lot of our students express their selves to be able to deal with day to day life. Please consider these points before making any decision that could affect the lifelong ambitions of a lot of Missouri students.

Sincerely,
Renae Eddy

Katnik, Paul

From: Nancy Witcher [nwitcher@mcdonaldco.k12.mo.us]
Sent: Thursday, January 05, 2012 9:37 AM
To: ESEA Waiver
Cc: nancy witcher
Subject: No child Left Behind waiver

If MSTA is correct that teacher evaluation and compensation would rest solely on student test scores, then I am against it. As a building testing coordinator, I believe evaluating a teacher's performance on how well a group of 25 students perform is unprofessional. Many legislatures and state employees should "walk" in a teacher's footsteps for a period of time before they decide evaluation and compensation be connected to a one time performance event.

Nancy Witcher
School Counselor
Anderson Elementary School
(417) 845-3485
512 Chapman Street
Anderson, MO 64831

Katnik, Paul

From: Vance Eden [veden@mail.wccards.k12.mo.us]
Sent: Thursday, January 05, 2012 9:51 AM
To: ESEA Waiver
Subject: NCLB Waiver

DESE,

I am a principal of a 5-6 building in Southwest Missouri. In reviewing the NCLB waiver I became very concerned. My largest concern is the vagueness and lack of clarity that is provided in the waiver. While this appears to be a way of fixing NCLB, it actually seems to further complicate a variety of issues for schools. Some of those issues include the way you are tying teacher evaluation to student test scores, compensation based on evaluation, and "Race to the Top."

Sincerely,
Vance Eden

Katnik, Paul

From: Jenny Parker [jparker@mail.wccards.k12.mo.us]
Sent: Thursday, January 05, 2012 10:11 AM
To: ESEA Waiver
Subject: NCLB waiver

> I would like to express my opposition to the NCLB Waiver proposal. It has many flaws that must be reconsidered to help Missouri students receive the best quality education possible. As an educator, I find it very unfair for lawmakers to propose such requirements without taking into account the many differences in education. In a time when educators are focused on differentiated instruction, these factors are not being considered at all. All students have their own unique learning style. This includes teaching methods and the time frame it takes for them to master an objective. These requirements would again not truly show academic growth nor show accurately how the teacher effectively taught a given objective. I work in a very successful school district that has shown proficient test scores and higher. Our community supports our district and we have teachers that truly want to help students succeed. Let's not start evaluating teachers based on test scores and try to fix something that is not broken. We are also at a time where our economy is continues to struggle and funding for education is suffering as well. There is no funds available for such proposal and we certainly do not need to take away from any academic monies to support this. This waiver is very vague and has not been planned out well. Let's stop and consider what education is about before we implement anything that would negatively impact our students.

Thank you,

Jenny Parker
Kindergarten teacher
Bess Truman Primary Center
WEbb City R-7

Katnik, Paul

From: DESE Communications
Sent: Thursday, January 05, 2012 10:17 AM
To: ESEA Waiver
Subject: FW: draft NCLB waiver application

-----Original Message-----

From: cmcgriff@blueeye.k12.mo.us [<mailto:cmcgriff@blueeye.k12.mo.us>]
Sent: Thursday, January 05, 2012 9:50 AM
To: DESE Communications
Subject: draft NCLB waiver application

I do not favor the NCLB waiver due to the fact that this would put MSIP 5 into effect w years earlier than allowed by Missouri statute and would not allow school districts enough time to implement the provisions. In addition, there are too many "unknown" factors; several factors have not been defined by US Department of Education and Missouri's plan does not provide critical information. It also includes certain provisions included in the Race to the Top application that I oppose. Last but not least, where will the money come from to implement these proposals. The federal and state governments already have budget crunches they are dealing with; I do not favor anything that will add additional expenses and very little benefit to students. I believe more time is needed to consider all these proposals and more input is needed from teachers and administrators before we move to do this in Missouri. Thank-you for taking the time to read this email and please consider my points in making your decision. Constance C. McGriff, Blue Eye High School History Teacher, Blue Eye, Missouri

Katnik, Paul

From: Oehler, Erin [EOEHLER@nwmissouri.edu]
Sent: Thursday, January 05, 2012 10:58 AM
To: ESEA Waiver
Subject: public comment period NCLB Waiver

Dear Sir or Madam:

I would like to express my concerns over the application for a waiver to No Child Left Behind. While NCLB has its issues, many of them, the timeline is too tight to thoroughly understand the long- and short-term ramifications of the waiver. For example, the early implementation of MSIP 5 before all the bugs have been worked out, could actually negatively impact the educational process.

If the request for a waiver is successful, I would request that the Fine Arts process standards in MSIP 5 be put in place.

Sincerely,

Erin Oehler

Art Instructor
Horace Mann Laboratory School
Northwest Missouri State University
001 Brown Hall, 800 University Dr.
Maryville, MO 64468

Katnik, Paul

From: Linda Uselmann [luselmann@mail.wccards.k12.mo.us]
Sent: Thursday, January 05, 2012 10:52 AM
To: ESEA Waiver
Subject: NCLB Waiver

I am concerned about DESE's desire to get the NCLB waiver. NCLB is an unattainable regulation and Congress seems to be in the process of rewriting the system. So why do we need a waiver from a system which many Congressmen say needs to be eliminated/rewritten? The waiver will increase regulations at the state and local level which increases the control the federal government has over our local districts. Solutions to problems in districts are better created/implemented at the local level, where one is closer to the problem.

I appreciate DESE's desire to improve education, but I do not believe programs like NCLB or the NCLB waiver as well as Race to the Top will improve education at the local level but will increase the control the federal government has over local schools and the redirect the attention from the students to the regulations which will cost the districts money to implement and take precious time from instruction.

Linda Uselmann
Social Studies
Webb City High School
luselmann@mail.wccards.k12.mo.us

Katnik, Paul

From: Ridder, Norman [nrider@spsmail.org]
Sent: Thursday, January 05, 2012 12:09 PM
To: ESEA Waiver
Cc: Superintendent's Cabinet; Thomas G. Prater, MD; Twitty, Jean; Lee, Gerry; Callen, Kris; Renner, Glenn B; Andy Hosmer; Denise Fredrick
Subject: FW: FINAL SPS Response to DESE on NCLB Waiver
Attachments: FINAL SPS Response to DESE NCLB Waiver 1.5.12.pdf

To Whom It May Concern:

Attached to this note is Springfield Public School's response to DESE regarding Missouri's request for the NCLB Waiver. Please let us know if you have any questions for clarification and/or need more information. Thank you for giving the districts an opportunity to provide feedback.

Norm Ridder

From: Goodman, Matthew
Sent: Thursday, January 05, 2012 11:58 AM
To: Ridder, Norman
Cc: Looten, Kathy; Kissinger, Anita; Lopiccolo, Helen
Subject: FINAL SPS Response to DESE on NCLB Waiver

Dr. Ridder,

Attached to this message you will find the final version of the response to DESE regarding the NCLB Waiver. The email address DESE noted for submitting feedback is: esea@dese.mo.gov.

Sincerely,
Matt Goodman

Matthew Goodman, Ph.D.
Director, Quality Improvement & Accountability
Springfield Public Schools
Springfield, MO
(417) 523-0306
mgoodman@spsmail.org

Confidentiality Notice: This email message and any accompanying attachments contain information from Springfield Public Schools, which is confidential and privileged. The email transmission and any attached documents are intended to be for the review and use solely of the individual(s) or entity(ies) named and listed on the email transmission message.

**A Response to the
Missouri Department of Elementary and
Secondary Education's
*No Child Left Behind Flexibility Waiver Request***

Prepared by

Springfield R-XII School District

Dr. Norman Ridder,

Superintendent

nridder@spsmail.org

(417) 523-0026

&

Dr. Matthew Goodman,

Director, Quality Improvement & Accountability

mgoodman@spsmail.org

(417) 523-0306

January 5, 2012

Springfield R-XII would like to thank the Missouri State Board of Education and the Department of Elementary and Secondary Education for giving us the opportunity to provide this response to inform the waiver request.

This response represents the Springfield R-XII School District's feedback to the Missouri Department of Elementary and Secondary Education's *No Child Left Behind Flexibility Waiver Request*. Upon initial review of the document, the district recognized that the thoughts and feedback provided to the state department would be most easily presented in one document, rather than through individual, separate, random emails. The input of representative district staff was used to formulate this response. The district has structured this response to address the strengths, opportunities for improvement, and unanswered questions associated with each principle.

Principle 1—College & Career Ready Expectations for All Students

Strengths

- Conducting the crosswalk for the new Common Core State Standards (CCSS) and the Show-Me Standards.
- Identifying the need, and seeking improvement, for the alignment of standards for English Language Learners.
- Having special education represented on the transition to Common Core State Standards (CCSS), as noted on p.4.
- The integration of an English Language Proficiency (ELP) specialist to assist on curriculum and assessment development, as noted on p.6.
- Engagement and partnership with higher education.
- Sample templates and availability of resources associated with Common Core State Standards (CCSS).
- Participating in and assuming a leadership role with SMARTER Balanced.
- Moving to an adaptive, online, real-time summative testing environment with SMARTER Balanced that will includes tools and suggested processes for teachers to maximize the data related to identifying and addressing individual student learning needs.

Opportunities for Improvement

- Regarding the Model Curriculum deployment, the transition to Common Core State Standards (CCSS), and deployment of SMARTER Balanced assessments, it would be helpful for the Local Education Agency (LEA) to have more specifics about the deployment plans and expectations for districts, as the statements provided are simply too broad for the LEA to interpret with any assurance of actually understanding what these deployments and transitions will entail and subsequently what will be expected of the LEA.
- Generation of outcome measures the state department could use to understand whether or not the deployments and transitions have been successful.
- Incentives should be identified for districts that elect to give the optional interim assessments associated with SMARTER Balanced.
- Shorten the 12-week time frame at the end of the year to make the high-stakes summative state assessment truly an end-of-year appraisal. If the curriculum for a grade level spans roughly 36 weeks over the course of a school year, it is not feasible to assess students and hold school districts accountable at a point in time when fully one-third of the curriculum could not have been taught. This approach degrades the whole

educational process as the school year calendars now stand. It sends a message that at least one-fourth of the school year is meaningless. (p.10)

- Regarding the expansion and development of End-of-Course Assessments (EOCs), on p.13 there is mention that, “The timeline for this development is dependent on funding, but the decision sends a strong message to Missouri schools that students must be held accountable for high achievement.” It is unfair to LEAs, their high schools, and most important the students, to not have a definitive timeline in place for the deployment of the new EOCs.
- It would be beneficial to LEAs for the state department to share the results of the study mentioned on p.13 that shows EOC exam performance is a significant predictor of ACT performance and enrollment in remedial courses.

Unanswered Questions

- What will become of the Show-Me Standards absent in the Common Core State Standards (CCSS)?
- How does Missouri reconcile standards present in the Common Core State Standards (CCSS) that were not in the Show-Me Standards?
- On p.5 a description of ongoing implementation activities in two districts is provided. However, it remains unclear how DESE will be able to facilitate and take a full deployment on, given the present resources available at the state and local (i.e., Regional Professional Development Centers--RPDCs) levels.
- On p.6 there is mention of establishing a statewide system of support to oversee Common Core State Standards (CCSS) professional development, including the recruitment of teacher-leaders. Is there an expectation that all buildings have a liaison (i.e., teacher-leader) for this work (professional development, training of other teachers, data collection)? Additionally, is there an expectation that all certified personnel (teachers, principals, counselors) receive training on the Common Core State Standards (CCSS)?
- On p.11 under Accountability with SMARTER Balanced, there is mention of member states receiving growth information for each student, however it is unclear if this growth will be from spring to spring or from fall to spring. Given that the expectation appears to only include summative testing, then growth would only be measured from spring to spring, as opposed to the more preferred way of fall to spring.
- It is unclear what assessment will look like for the grade levels and content areas outside of the areas designated in SMARTER Balanced.
- On p.13 there is mention that alignment between the Curriculum Alignment Initiative (CAI) competencies and Common Core State Standards (CCSS) is apparent, however nothing more was shared as to what the next steps might be in light of these findings.

Principle 2—State-developed Differentiated Recognition.

Strengths

- As noted in the *Accountability* section on p.14, it would be very beneficial for the state, districts, and stakeholders to have one system of accountability.
- SPS endorses and supports the state department's efforts to instill a model of improvement that rewards continuous improvement.
- SPS commends the state department for the deliberate and methodical two-year pilot that has been used related to the Growth Model for accountability. The district would encourage the department to take similar steps, relative to the processes and timeframes used, for other large-scale deployments, such as those proposed with this flexibility waiver.

Opportunities for Improvement

- SPS has strong reservations about the establishment and deployment of the Department staff identified as Project Manager (PM), Instructional Improvement Coordinator (IIC), and Instructional Improvement Staff (IIS). The waiver application notes, "A memorandum of understanding unique to each district addresses the PM's and IIC's roles and ensures clarity of responsibilities and authority within the district" (p.21). SPS is deeply concerned with the prospect of a team from the state department having as much influence on the workings of the districts as it appears they would have.
- On p.25, the waiver requests notes, "The MSIP 5 accountability system enables the Department to provide comprehensive support systems and distinguishes high performing districts with public recognition." SPS would advocate for the state department to go beyond public recognition for high performance and extend to those districts additional benefits/incentives for reaching and sustaining exemplary levels. Examples of such additional benefits/incentives might include financial considerations or more autonomy and flexibility with regards to instructional delivery or certain expectations laid out in the yet to be determined Resource and Process Standards associated with MSIP 5.

Unanswered Questions

- At the time of this writing (early January 2012), there is much that is unknown relative to translating the adopted MSIP 5 standards to a scoring system of accountability. Therefore, it makes it impossible to provide feedback on the system the waiver

proposes to establish, when none of the details are known about how the MSIP 5 standards will be translated to measures and indicators with the revised APR.

- Regarding *Reward Schools* (p.24), it is unclear what types of incentives/rewards such a designation would entail. For example, will these rewards be financial or policy-driven (i.e., flexibility relative to having more autonomy at the local-level?).
- Regarding *Priority* and *Focus* schools (pp. 24-25), it is unclear what differentiates these two designations. The *One Accountability System Overview* model presented on p.17, indicates differences related to the 5% lowest performing buildings (Priority) and 10% highest gap or lowest achieving (Focus). However there would appear to potentially be some overlap in school identification of these. Does that mean a site could be both a Priority and a Focus school? And beyond that, the waiver request only notes that the criteria for designation will be established once the Scoring Guide is complete, while there is a complete absence of any detail whatsoever as to what differences might be expected to take place within a site carrying such a designation, and as to the duration the designation would carry forward (1 year, 5 years, permanently?).

Principle 3—Supporting Effective Instruction and Leadership

Strengths

- SPS commends the state for the excellent work it has done with regards to the model teacher and leader system (frames, standards, rubrics, evaluation) (pp.26-29).
- It is noted on p.38 that, “Missouri’s LEAs will have the option of using all or portions of the state’s model educator evaluation system, or creating and implementing their own local systems.” SPS believes districts should have the flexibility to adapt/adopt the evaluation itself as they will have with the standards.
- SPS supports the tenet all teachers should receive ongoing, deliberate, meaningful and timely feedback.

Opportunities for Improvement

- On p. 39 it is noted that the professional impact frame is organized based on multiple measures of student evidence. SPS assumes this to be the area where student achievement performance or growth would be related to teacher evaluation. However, based upon the description provided, it is unclear how measures of student performance will be included in the evaluation process.

Unanswered Questions

- It is noted on p.39 that there will be a certification process for evaluators provided by the state department. It is unclear to the district how this certification would take place where different systems are in place at the district level. A related question would then be if the district is responsible for establishing and executing a certification process for their unique evaluation processes.

Key Themes

As the district reviewed the flexibility waiver, key themes emerged across the three principles that the district feels should be expressed:

- The central tenet of the waiver proposal appears to be an alignment of federal and state control over districts and schools. Alignment and the promotion of efficiency across the systems is a commendable and embraceable goal, however it comes at the expense of choice at the local level.
- It is unclear as to where the funding will come from for many of the proposed activities, structures, roles, and responsibilities presented in the waiver proposal. Specific examples that appear to have a cost associated with them include, but are not limited to:
 - Professional development for teachers and leaders on Common Core State Standards (CCSS) and SMARTER Balanced Assessment,
 - The training of regional-teacher leaders with Common Core State Standards (CCSS),
 - The collection of district data to establish Common Core State Standards (CCSS) priorities and needs,
 - Evaluator certification,
 - The deployment of “highly effective educators” within their buildings, their district, and our state,
 - The salaries of Project Manager, Instructional Improvement Coordinator, and Instructional Improvement Staff,
 - The overall costs of the assessments in SMARTER Balanced for the interim and summative assessments.
- There are “unknowns” distributed across all of the principles, which makes it difficult to even attempt to forecast the potential impact of such widespread changes, including the financial costs of implementing such a system.

Connection to Top Ten by 20

In June of 2011, Springfield R-XII requested the Hanover Research company examine the policies and initiatives in place in ten of the nation's highest performing states (i.e., "the top ten"), with particular attention paid to college and career readiness assessment, formative assessment, and data collection.

A summary of the key findings:

- The development of P16 or P20 councils or initiatives has been common among the states under review, as has the creation and ongoing enhancement of longitudinal data systems that link data across the grade levels from early childhood through postsecondary education.
- Most of the states under review have planned or launched longitudinal data systems, which empower the state to track the performance of high school graduates into postsecondary education. Some state departments of education have linked their systems with those of other agencies, such as the department of labor, corrections, or children and family services, to expand knowledge of how educational success influences life outcomes.
- Within the context of college readiness, remediation rates (i.e., the percentage of students enrolled in remedial courses during the first year of college) have been cited as one of the most powerful statistics in states' data collection efforts.
- Few states currently administer exams that explicitly assess college and career readiness, though most states under review have joined national consortiums that focus on the development of common assessments that are standards-aligned and indicative of college readiness.
- Such consortiums include the SMARTER Balanced Assessment Consortium (Connecticut, Maine, Montana, Vermont, Wisconsin), the Consortium on Board Examination Systems (Connecticut, Maine, New York, Vermont), and the Partnership for the Assessment of Readiness for College and Careers (Massachusetts, New Jersey, New York).
- Since 2006, Maine has required its public high school students to take the SAT in their junior year. Meanwhile, Minnesota subsidizes the cost for public school students to complete the ACT's PLAN and EXPLORE college readiness exams. Tony Evers, the State Superintendent of Public Instruction in Wisconsin, has advocated that his state also

subsidize the cost of the PLAN and EXPLORE exams, while Montana has discussed the need to remove the fees associated with the ACT exam.

- States do not commonly have formal policies or programs that dictate the use of formative assessment, though the approach is often encouraged. Montana, New York, and Virginia offer professional development opportunities focused on formative assessment, while Connecticut provides resources for teachers to use in grades 3-8 through its Connecticut Benchmark Assessment System.

Springfield R-XII found it affirming to see alignment with the practices in the “Top Ten” and some of the initiatives proposed and underway (establishment of and work of P20 councils, integrated data systems, and leadership with the SMARTER Balanced Assessment Consortium) in the waiver request.

Katnik, Paul

From: Carina Hrdina [chrdina@msta.org]
Sent: Thursday, January 05, 2012 12:30 PM
To: ESEA Waiver
Subject: MSTA Letter Regarding NCLB Waiver Request
Attachments: 20120105122652670.pdf

Importance: High

Attached is MSTA's official letter regarding the NCLB Waiver Request from Kent King, Executive Director. If you could please respond so that we know that you have received this, we would greatly appreciate it. We have faxed a copy and will send the letter in the mail today as well. Thank you.

Carina Hrdina
MSTA Executive Coordinator
Missouri State Teachers Association
800-392-0532
Fax 866-470-1883
www.msta.org



MISSOURI STATE TEACHERS ASSOCIATION

January 5, 2012

Mrs. Margie Vandeven
 Office of Quality Schools
 Missouri Department of Elementary and Secondary Education
 P.O. Box 480
 Jefferson City, MO 65102-0480

Dear Mrs. Vandeven:

The 44,000 member Missouri State Teachers Association is opposed to Missouri's application for an Elementary and Secondary Education Act (ESEA) Flexibility Waiver. While the proposal is touted as an opportunity for "Missouri to obtain relief from provisions of NCLB," in reality, the proposal imposes additional mandates on Missouri school districts, reduces state flexibility over accountability and diminishes local control.

The assurances to which Missouri must agree come with a huge price tag that will be paid by the state and public school districts, yet no financial impact study has been conducted. Given the state budget crisis and its impact on public school districts, it's difficult to understand how the State Board of Education can justify the support of such drastic initiatives without an analysis of the financial implications. This question is even more perplexing given there is no research to demonstrate how the principles within the waiver application will lead to improved student achievement.

As with most accountability systems, "the devil is in the details." Unfortunately neither the U.S. Department of Education, nor DESE has provided enough details for anyone to support the application. Of the eleven states which have applied for the application, no applications have been approved and only two states have been viewed favorably. As such, the "vagueness" and lack of clarity provided in the application will likely result in negotiated proposals with more stringent requirements than those included in the initial submissions. For Missouri school districts, this is and should be of great concern. Not only are we uncertain what we're agreeing to up front, we are even more uncertain what we'll be forced to adhere to in the end.

As with all federal initiatives, the "carrot and stick" philosophy prevails. Not only are the requirements for teacher evaluations and state standards clear "sticks," but sacrificing our state's system of accountability will taint what has long been a widely well-recognized system. Instead of "gaining" NCLB flexibility, we will be "LOSING" state flexibility. Multiple systems of accountability won't solve NCLB

MSTA HEADQUARTERS
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 Columbia, MO 65205
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 FAX: 573.443.5079

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issues but will flaw MSIP and create an infected statewide system with negative consequences for our schools, teachers and students.

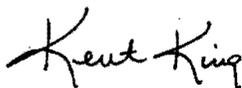
Once again, much like Race to the Top, Common Core Standards, and the SMARTER Balanced Assessment Consortium, we are now exhausting state resources in pursuit of another federal initiative that is likely a temporary provision, with requirements and guidelines that will be replaced with new reauthorization requirements and guidelines after less than one year. There are NO real consequences for states that do not meet NCLB requirements by 2014. It seems that it would be more cost effective and efficient to continue to live with the current requirements and guidelines than to deplete resources on a short-term solution that will have long-term, costly, adverse consequences for public school districts.

While the latest FAQ posted on DESE's Website indicates that replacing NCLB with MSIP 5 will not cause districts to be accredited under MSIP 5 until December 2013, as required by state statute, the FAQ indicates that the MSIP 5 Performance Standards will be used to generate the Annual Performance Report (APR) for federal accountability purposes. Correspondence from DESE also indicates that the ESEA flexibility waiver will create a "single system of accountability." If this is true, then MSIP 5 will go into effect during the 2012-13 school year and will be in conflict with state statute.

Finally, our members are greatly concerned with the timeline and timing of this proposal. The first draft of this 40 plus page proposal was made public on December 5, with comments to be received by January 5. Most school districts are concerned with end of semester activities, such as final exams, during the second week of December and most schools are out of session during the third and fourth weeks of December, making the timing not conducive for valuable input. Once again, it seems that the urgency to comply with federal timelines has replaced the desire to receive meaningful feedback from those who will be impacted the greatest by new initiatives.

This application is not in the best interest of Missouri children, school districts or taxpayers. Please reconsider your recommendation to the State Board of Education and don't apply for the waiver.

Sincerely,

A handwritten signature in black ink that reads "Kent King". The signature is written in a cursive style with a large, prominent 'K'.

Kent King

Katnik, Paul

From: DESE Communications
Sent: Thursday, January 05, 2012 1:13 PM
To: ESEA Waiver
Subject: FW: NCLB Input
Attachments: flexibilty request waiver letter (2).docx

From: Lanham, Geoff
Sent: Thursday, January 05, 2012 12:51 PM
To: DESE Communications
Subject: NCLB Input

Please find the attached letter regarding the flexibility waiver request. Thank you for your consideration.

Geoff Lanham
Program Specialist II
glanham@mpcdd.com

Missouri Planning Council for Developmental Disabilities
1706 East Elm Street
Jefferson City, Missouri 65101
573-751-8205
573-526-2755 (FAX)
Visit us on the web at: www.mpcdd.com

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Missouri Planning Council for Developmental Disabilities
 P.O. Box 687, 1706 E. Elm St., Jefferson City, Missouri 65102
 573-751-8611/800-500-7878/573-526-2755 (FAX)
Stephanie Briscoe, Chairperson *Susan Pritchard-Green, Director*

www.mpcdd.com

Jeremiah "Jay" Nixon,
Governor

January 5, 2012

Margie Vandeven, Assistant Commissioner
 Department of Elementary & Secondary Education
 P.O. Box 480
 Jefferson City, Missouri 65102

Re: Draft NCLB Flexibility Request

Dear Commissioner Vandeven:

The Missouri Planning Council for Developmental Disabilities would like to submit input on the draft of the No Child Left Behind Flexibility Request. We believe that children with developmental disabilities should be held to high standards, which increase the likelihood that they will graduate with their peers, achieve competitive employment in their communities or participate in post secondary educational opportunities, and be prepared to be fully participating citizens in their community.

The Council believes strongly that students with developmental disabilities should attend regular classrooms in their neighborhood schools with their peers, and receive the individualized, flexible supports necessary to ensure that they have a successful education experience. Students with disabilities should learn in an inclusive classroom and be afforded the professional, educational, and technical supports necessary to be a success. The Missouri DD Council wants to ensure that students with disabilities have these opportunities by including the following in the Flexibility Waiver Request:

- Ensure that **all** students who graduate are prepared for the academic challenges of college and/or entering the workforce ready to succeed;
- Develop and administer high-quality assessments that measure student growth for **all** students;
- Address how student achievement, school performance and the quality of instruction will be improved, and the achievement gap closed for students with disabilities;

Margie Vandeven
Page Two

- Increase the graduation rate of students with disabilities receiving regular high school diplomas;
- Develop and adopt guidelines for local teachers, principal evaluations, and support systems that improve student achievement and the quality of instruction for students with disabilities.

As you prepare to submit your Flexibility Waiver, we ask that you provide students with disabilities inclusive opportunities in the general education curriculum that allow them to graduate with their peers with a high school diploma, progress to successful community employment, and prepare them for post secondary education opportunities.

The **Missouri Planning Council for Developmental Disabilities** is a federally- funded, 23-member, consumer-driven council appointed by the Governor. Its mandate under P.L. 106-402, the Developmental Disabilities Assistance and Bill of Rights Act, is to assure that individuals with developmental disabilities and their families participate in the design of and have access to needed community services, individualized supports, and other forms of assistance that promote self-determination, independence, productivity, and integration in all aspects of community life.

Sincerely,

Stephanie Briscoe

Stephanie Briscoe, Chair
Missouri Council for Developmental Disabilities

SB:gld

Katnik, Paul

From: Joy Davis [jdavis@vf.k12.mo.us]
Sent: Thursday, January 05, 2012 1:48 PM
To: ESEA Waiver
Cc: Van-Far R-I - Christopher Felmler
Subject: ESEA Flexibility Waiver DRAFT #2

I have read both drafts and all the presentation materials on the site provided. As a retired high classroom teacher, MAP Senior Leader Class 8, and a current A+ Coordinator, all in the Van-Far School District, I find the second draft just as confusing and unclear as the first. Here is my thought, this district has spent much time and money meeting the requirements of No Child Left Behind. The students are making progress and the buildings are improving instruction and curriculum. Why not finish up what has been started? NCLB is scheduled to end with 2014. Why overlap or why start another program until this one is finished? I am not sure this would be in the best interest of education in Missouri or anywhere else for that matter. Why push MSIP 5 forward? The responses on MSIP 5 led to changes there. Responses to proposals in the A+ program helped make that program clearly better for students with the Algebra I EOC requirement rather than what had been originally proposed. I hope that DESE can see its way clear to drop the waiver request or at the very least make the waiver proposal more workable. At the present it looks to me like DESE is struggling to justify its present bureaucracy rather than serve the best interests of the students of Missouri. As for the professional aspects, I have been around long enough to realize that good teachers are born and not made from expensive, fancy programs. Thanks for listening to my thoughts on this subject. The Draft needs much more work before it would be acceptable.

Joy Davis

--

Joy Davis
A+ Schools Coordinator
Van-Far School District

Katnik, Paul

From: Becky King [bking@mail.wccards.k12.mo.us]
Sent: Thursday, January 05, 2012 1:58 PM
To: ESEA Waiver
Subject: NCLB Act

to whom it may concern,

After reading through this article, as an educator, I do not feel it is, in anyway, beneficial to students or teachers. I feel that it is generic and does not cater to students' individual needs and will make things more difficult for everyone. I think that this is a poor choice for the Missouri educational system and I am extremely against it. I think that it would not be a good choice to implement. Please do not pass this in Missouri.

Thank you.

Becky King

Katnik, Paul

From: KLAPMEYER CASEY [caseyk@hickmanmills.org]
Sent: Thursday, January 05, 2012 1:57 PM
To: ESEA Waiver
Subject: Waiver needs to be reconsidered/ revised before adoption

To whom it may concern:

There are many components to the waiver, written as is, that need to be reconsidered or revised. The plan overall seems very vague and yet it is a document that will have important implications for Missouri school districts for years to come. In a time that school budgets are being slashed, it seems that a key piece to this waiver should be its financial impact on its implementation at the state and district level. The adoption of this waver would cause MSIP 5 to go into effect immediately instead of 2013 as originally planned. The plans seems to implement a top down approach when it comes to evaluation of staff and compensation. Taking away the power and decision making responsibility from local boards and superintendents. The rush to get this waiver seems very similar to the rush of MSIP 5 and there is not reason for the state to act so quickly and something that will effect all students in Missouri and have major implications for all districts.

Thank you for considering these points in moving forward with the waiver.

Casey Klappmeyer
Associate Superintendent
Hickman Mills C-1 School District

Casey D. Klappmeyer
Associate Superintendent of Elementary Schools
9000 Old Santa Fe. Rd.
Kansas City, MO 64138

816-316-7043

"On your worst day on the job, you are still some child's best HOPE!" -Larry Bell

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The Hickman Mills C-1 School District does not discriminate on the basis of race, color, national origin, gender, disability, or age in its programs and activities and provides equal access to the Boy Scouts and other designated youth groups. The following person has been designated to handle inquiries regarding the non-discrimination policies:

Human Resources Department

9000 Old Santa Fe Road
Kansas City, Missouri 64138
816-316-7214

Katnik, Paul

From: Cover, Holly - FHS [Cover@fox.k12.mo.us]
Sent: Thursday, January 05, 2012 3:12 PM
To: ESEA Waiver
Subject: opposed to NCLB waiver request

Hello, I'd just like to register my opposition to the NCLB waiver request. As a teacher, in a Missouri Public school as well as a parent of two children in Missouri Public schools, I'd like to voice my opinion.

I am opposed to it for several reasons, mostly due to lack of detail in the document - lack of clarity, and failure to back it up with resources, which historically is a common problem with educational initiatives.

I am especially opposed to teacher compensation based on evaluation results. I've been evaluated many times by many different principals and results have varied, whereas my performance hasn't – I have always done the best I can with what I'm given. Principals change over a lot more than teachers, and even though my principal is a great young man, and fairly good at his job, he was NOT in a classroom for very long, and he has no specialized knowledge of my field or the common practices related to it.

In addition, student achievement data is not a reasonable way to evaluate teachers. First, not all subjects have a state test or state standards, and second, in a large district, or even state-wide, not all classes are stacked evenly. Low achieving students tend to be grouped together, for whatever reason, and someone needs to teach them without fear of losing their livelihood. Also from one area to another, cultural expectations limit or push students, so they really cannot be compared against one another. In any scientific experiment if there are too many variables, the data is not reliable and there are too many variables to student achievement to evaluate teacher's performance.

Thanks for your consideration,

Holly Cover, Teacher
Fox Senior High

Katnik, Paul

From: Ginger Ellison [gellison@nkcschools.org]
Sent: Thursday, January 05, 2012 3:12 PM
To: ESEA Waiver
Subject: NCLB Waiver Request

I have read over the waiver request and would like to voice my concerns. I understand the need to search for solutions as we face the impossible task of 100% proficiency by 2014. I work in a Title 1 school and understand the implications of not meeting our goals all too well. However, my main concern is that there are too many "unknowns" in the waiver that could have a very serious impact on the field of education.

On page 39 where it talks about compensating teachers based on student performance, it does not clearly state what measurements of student growth will be used. Instead, it just lists options. My fear is that we won't just look at the growth of each individual child. It will become all about MAP scores. Who determines what assessments will be used...school districts, administrators, state legislators? As a Title 1 reading teacher, this is of serious concern for me because I work with the lowest children in the building. They don't make the growth others do and they certainly are not all proficient on the MAP.

When you talk about paying people based on student achievement, it also brings up the concern of drawing fewer highly effective teachers into Title 1 schools. These children are the ones who need the best teachers and we already have a hard time of getting and keeping the highly effective ones.

On page 40 it talks about compensating highly effective teachers. Implementation of this kind of thinking could be extremely detrimental to the field of education. If you're going to pay one teacher over another for being highly effective, I'm concerned that it will completely eliminate collaboration amongst professionals which will only further widen the achievement gap. Our district has spent a significant amount of time training our staff in the area of PLTs so we can move our whole system forward, not just one classroom.

There are situations, probably more than we like to admit, of administrators who evaluate people not on the performance in the classroom but based on the personal relationship they have with the teacher. I have experienced it first hand in my 14 years in the field.

Teachers are only one small piece of the puzzle when you talk about what's wrong with education, and yet that's all we're focusing on at the moment.

Sincerely,
Ginger Ellison

Ginger Ellison
Reading Teacher
Winnwood Elementary
(816) 413-4661
gellison@nkcschools.org

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Katnik, Paul

Sent: Thursday, January 05, 2012 4:21 PM
To: ESEA Waiver
Subject: NCLB waiver

Please make sure that the FA (Fine Arts) process standards are in place should you be successful in getting the No Child Left Behind waiver passed. I am an art specialist at Valley Park Elementary School and have aligned my curriculum to our state standards. All 490 students come into our art room weekly to learn to communicate and express themselves through the art techniques suggested by our Missouri standards. We incorporate reading, writing, science and math as much as the topic studied and time allows. The techniques are differentiated for individual students being on either side of the "normal ability" spectrum. Concrete standards are most appreciated when I write the curriculum. Thank you for your thoughtful floor comments and careful consideration of all students as you vote. Lois Jacobs, Art Specialist, MAT, NBCT

Katnik, Paul

From: Clawson, Tisha [tclawson@bolivarschools.org]
Sent: Thursday, January 05, 2012 9:59 PM
To: ESEA Waiver
Cc: tclawson73@gmail.com
Subject: Comments on the second draft waiver

First let me state that I believe it is valuable and of ultimate benefit to the education of students in Missouri for the educational community of Missouri to establish and control the standards of rigor for Missouri students and educators. I applaud DESE for being willing to take up this challenge and return control of education to the Missouri educational community rather than let it remain in the hands of the Federal government. However, after studying the released second draft of the waiver I have some concerns.

Principle 1 focuses on student readiness as measured through rigorous academic testing. MAP testing 3 - 8 in conjunction with EOC exams for high school students. I believe the rigor we have established with our state level testing is to be applauded for its high expectations and the outstanding teaching changes that have occurred across the state as a result. I don't want our testing to take a step backwards under our proposed state system and it appears that rigor will be maintained in the future under the proposed waiver.

Principle 2 seems to be focused solely on evaluating the effectiveness of schools from the building to the district level. MSIP has been our state measure of this and will continue to be if the waiver is approved. While MSIP has evolved over its life I am concerned with the shift in focus between MSIP 4 and 5. With the many discussions that have occurred across the state regarding these changes, in the waiver application it seems that MSIP 5 is being presented as a system of accountability that has support from all areas of the Missouri educational system. That is a false presentation. I still have grave concerns with some of the dynamic shifts in MSIP 5 and I am aware of many many others across our state that share these concerns. It seems that if the waiver is accepted it would also move up the time table for implementing MSIP 5. This is not something I can in good conscience support at this time.

Principle 3 is where the majority of my concerns seem to culminate. When reading through this section many items are referenced as being developed, will be added in January, being field-tested with anticipated results available in summer 2012. I do not feel that I as an educator can endorse something that would ultimately control my employment as an educator in the state without having full disclosure of all of the components. For example rubrics are currently being field-tested in 100+ districts. These field- tested rubrics will then be refined and used as the expectation for all districts. (yes districts are offered a measure of local control but very little). If this waiver is accepted then those rubrics would be an expectation even though at this point only 1/5 of the districts in the state have had any input on them and the percent of teachers actually utilizing them is even less. This causes me great pause in offering any support to the waiver as it currently stands.

At this time I would recommend that DESE table the waiver until a later submission date so that all components of the system being proposed have been fully reviewed by a majority of the educators and districts. Forcing change without buy in never seems to bear fruitful results. We need a system that all Missouri educators believe in and will consistently work to support and this waiver is not there yet.

If you are to proceed with this then please note the following comments on points of specific editorial issues.

Page 27 - last sentence of paragraph two. Words appear to be missing from the sentence as it does not make sense.

Page 28 - the last sentence of the first paragraph is incomplete.

Tisha Clawson
Library Media Specialist
Bolivar Intermediate School

Katnik, Paul

From: chris guinther [chris.guinther@mnea.org]
Sent: Friday, January 06, 2012 7:53 AM
To: ESEA Waiver
Subject: Comments for consideration on ESEA Waiver

1. Principle 2: Use MSIP 4 for both federal and state accountability for the next two years
2. Principle 2: On page 20 of the draft, regarding RSIT: teachers seem to be missing from the wording (even if it is in the intent.) Include a teacher selected by the local teacher association to be on the team.
3. Principle 3: To ensure equitable distribution of high-quality teachers, provide effective professional development for teachers in high-needs buildings. (An example would be "Take One" from the National Board for Professional Teaching Standards.)
4. Principle 3: Provide educators with extra pay for extra work
5. Principle 3: Use local assessments and performance events for the teacher effectiveness section of the model teacher evaluation.
6. Principle 3: Explicitly state that the MAP test is not to be used for teacher evaluation.

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Chris Guinther, President
Missouri National Education Association
1810 East Elm
Jefferson City, MO 65101-4174

Phone: 573-634-3202, 800-392-0236

Fax: 573-634-5646

www.mnea.org

"The mission of the Missouri NEA is to serve as the united voice to promote, advance and protect public education and to advocate for the rights and interests of students and our members."

Katnik, Paul

From: Cory McMahon [cjmc404@hotmail.com]
Sent: Friday, January 06, 2012 8:37 AM
To: ESEA Waiver
Subject: Re: Extention of NCLB Waiver comment period

Thank-you for your response below.

Sincerely,

Cory McMahon

From: ESEA Waiver
Sent: Friday, January 06, 2012 8:25 AM
To: 'Cory McMahon'
Subject: RE: Extention of NCLB Waiver comment period

Thank you for your inquiry.

Comments will be accepted through the proposed submission date of February 21st, although a final determination about whether to submit the waiver has not been made.

From: Cory McMahon [mailto:cjmc404@hotmail.com]
Sent: Wednesday, January 04, 2012 5:40 PM
To: ESEA Waiver
Subject: Extention of NCLB Waiver comment period

To Whom It May Concern:

I understand that the comment period for Missouri's second draft application for the NCLB Waiver from the U. S. Department of Education has been extended. When does the NCLB Waiver comment period end?

Sincerely,

Cory McMahon

Katnik, Paul

From: Dr. George Curry [curryg@smithville.k12.mo.us]
Sent: Friday, January 06, 2012 12:45 PM
To: ESEA Waiver
Subject: NCLB Waiver

To DESE:

Please give strong consideration to delaying a waiver application until we can further explore the benefits and costs of such a request. After reviewing the waiver application, I am concerned that districts will be sacrificing local control to avoid NCLB sanctions. The cost associated with receiving the waiver has not been fully explored. Considering the financial state that we are currently in, it is vital to completely understand the ramifications of requesting an NCLB waiver.

George Curry

--

George Curry, Ed.D.
Superintendent
Smithville R-II School District

Katnik, Paul

From: Thornhill, Julene [Thornhill@msbanet.org]
Sent: Friday, January 06, 2012 5:10 PM
To: ESEA Waiver
Cc: vicshar@swbell.net; glee2026@sbcglobal.net; phutch419@hotmail.com;
dave.wright@rma.usda.gov
Subject: Comments Regarding DESE's Draft ESEA Flexibility Request
Attachments: MSBA Comment Letter 1 6 12.pdf

Importance: High

Please see attached comment letter regarding DESE's draft ESEA Flexibility Request.

Julene Thornhill
Administrative Specialist
Missouri School Boards' Association
2100 I-70 Dr SW, Columbia, MO 65203
573/445-9920, ext. 333
thornhill@msbanet.org



January 6, 2012

State Board of Education
Department of Elementary and Secondary Education

To Whom It May Concern:

The Missouri School Boards' Association (MSBA) is writing this letter in response to the request for comments on the Missouri Department of Elementary and Secondary Education's (DESE's) draft Elementary and Secondary Education Act (ESEA) Flexibility Request. MSBA is a non-profit organization created to support public school districts in the state of Missouri. It is organized and operated by public school board members. Currently a majority of Missouri school districts belong to MSBA, representing over 95% of public school students in the state.

MSBA supports DESE's efforts to seek a waiver of some of the federal requirements in the absence of reauthorization because the current law has become particularly onerous and unduly punitive to districts that are doing a fantastic job of educating students. If given a choice, MSBA would prefer reauthorization of the law as that gives districts some security to plan for the future. MSBA hopes that DESE is taking an opportunity to advocate for Missouri schools in the reauthorization process. However, given the reality of the current political situation as well as the increasing punitive requirements of the law, MSBA supports DESE's initiative to seek a waiver as well.

Unfortunately, MSBA has concerns that the current document does not meet the requirements set out by the U.S. Department of Education for a state to receive a waiver. Further, the draft document as currently written does not provide enough details for Missouri school districts to adequately analyze and comment on DESE's alternative plan. We encourage DESE to review and revise its current application in accordance with the following comments:

- 1. The document does not appear to identify which portions of the federal law DESE would like waived.**

The draft document does not identify and communicate which of the ten ESEA requirements DESE is requesting be waived. Pages 4 and 5 of the *ESEA Flexibility Request* (Application), dated September 23, 2011, make it clear that the state must identify which portions of the law the state would like waived. It is difficult for school districts to comment on this draft without knowing from which parts of the federal law the state is seeking relief.

- 2. The document does not seem to address the assurances required by the *ESEA Flexibility Request*.**

The Application includes the form DESE must fill out and return to the U.S. Department of Education to receive a waiver. Pages 6 and 7 of the Application include assurances DESE must make to the federal

government. The draft document does not address how many of these assurances will be met, leaving school districts wondering how exactly they will be accomplished. For example:

- A. Assurance #5 requires DESE to “report annually to the public on college-going and college credit accumulation rates for all students and subgroups of students in each LEA and each public high school in the State.” As this requirement is not addressed in the draft document, it is unclear how DESE plans to meet this requirement. Will school districts be required to collect and report on this information?
- B. Assurance #8 requires DESE to “report annually to the public and each LEA will annually report to its SEA and to the public, beginning no later than the 2014-15 school year, on the aggregate distribution of teachers and principals by performance level, including the percentage of teachers and principals by performance level at the State, LEA, and school level and by school poverty quartile within the State and LEA.” This would be a new requirement in Missouri and DESE does not explain how this assurance will be met.
- C. Assurance #10 requires DESE to “evaluate, and based upon that evaluation, revise its own administrative requirements to reduce duplication and unnecessary burden on LEAs and schools.” Once again, this process is not addressed.
- D. Assurance #11 requires DESE to verify that it has “consulted with its Committee of Practitioners regarding the information set forth in its request.” To our knowledge, the Committee of Practitioners is not currently in place in Missouri as set forth in ESEA Section 1903 and therefore could not have been consulted.

MSBA and public school districts cannot support this request for a waiver without more information regarding how DESE is going to accomplish these tasks. Further, MSBA is concerned that failure to address these assurances in the draft document will result in rejection of the request for a waiver.

3. The document gives the impression that it does not conform to the requirements as set out in the *ESEA Flexibility Request* and the *ESEA Flexibility Review Guidance*.

MSBA encourages DESE to revise the draft document in accordance with the directions provided in the *ESEA Flexibility Request* (Application) and the *ESEA Flexibility Review Guidance* (Guidance) from the U.S. Department of Education. The U.S. Department of Education has clearly set out the expectations in these documents and will rely on these documents when scoring the applications. A serious waiver request needs to carefully follow these directions.

DESE’s draft does not follow the directions in the Application or the Guidance. While there are numerous omissions and/or other failures to follow the directions set forth by the U.S. Department of Education, following are just a few examples, which MSBA is particularly concerned:

- A. Pages 1 and 2 of the Application provide a model Table of Contents that states should use, including the appropriate subheadings. DESE's draft does not use these subheadings or include a table of contents at all. Page 2 provides a list of required attachments, some of which are discussed below. DESE's draft does not include any attachments to support the waiver request.
- B. Section 2.A.i.b. and c. of the Guidance require DESE to propose a "differentiated recognition, accountability, and support system" to "create incentives and provide support to close achievement gaps for all subgroups of all students." Likewise, the support system must "include interventions specifically focused on improving the performance of English Learners and students with disabilities." These items are not addressed in the draft document. In fact, the draft barely addresses these subgroups at all.
- C. Section 2.B. of the Application and the Guidance requires DESE to describe the method it will use to set annual measurable objectives. The draft document states that scoring information will be available in January, but does not describe the method DESE will use to set these objectives.

Further, this section requires DESE to specify which of the three stated options DESE will use. The Options are described on page 13 of the Application and pages 11 and 12 of the Guidance and detail what supporting information is necessary to support the option chosen. DESE does not specify which Option it will use, or provide any supporting information. Our concern is that the U.S. Department of Education will not approve this waiver without more information regarding which objectives DESE will use and the method by which those objectives will be set.

- D. Section 2.C.i. on page 14 of the Application and page 12 of the Guidance requires DESE to "describe its methodology for identifying highest-performing and high-progress schools as reward schools." Other than a reference to an unreleased scoring guide, the draft document does not address this requirement.

Section 2.C.ii. requires DESE to provide a list of the schools that would be classified as "reward" schools in Missouri. DESE does not provide this information. Section 2.C.iii. requires DESE to describe how it will publicly recognize these schools. This has also not been addressed.

- E. Section 2.D. on page 14 of the Application and pages 12 through 14 of the Guidance requires DESE to provide detailed information about "priority schools," starting with the methodology for identifying these schools. Other than a vague definition at the top of page 20 of the draft that these schools will be "poorly performing," "administrative or budget inadequacies exist" or the schools "demonstrate a history of little improvement," there are no details as to how these schools will be identified, let alone the methodology behind the identification. Likewise, DESE does not include a list of current schools meeting the "priority" definition, as is required by 2.D.ii.

Section 2.D.iii. requires a description of the interventions DESE will provide for these priority schools. The Guidance lists seven subcategories DESE is required to address, most of which have not been addressed. For example, DESE does not address replacing or supporting the building principal; preventing ineffective teachers from transferring schools; redesigning the school day, week or year; addressing the school environment; or engaging the community – all of which the Guidance requires the application to discuss. Without more information on the actual interventions DESE will use, it is impossible for MSBA to comment on this other than to strongly encourage DESE to use this Guidance to rewrite the draft.

- F. The same problems exist for Section 2.E. on page 15 of the Application and pages 14 and 15 of the Guidance. DESE has not provided the information the U.S. Department of Education is requiring. Focus schools are not even mentioned in the draft document except in a graphic on page 18 and two sentences on page 26. Obviously, this information is not sufficient.

There are many, many other examples of how this draft document does not conform to the Guidance, but MSBA will not detail them all. In order for serious consideration to be given to the flexibility request submitted by Missouri, MSBA strongly recommends that DESE rewrite its proposal using the Guidance so that Missouri has a chance at receiving the waiver.

4. The document appears to have insufficient stakeholder input.

Page 8 of the Application and page 5 of the Guidance make it clear that DESE is required to “meaningfully engage and solicit input on its request from teachers and their representatives” as well as from “other diverse communities, such as students, parents, community-based organizations, civil rights organizations, organizations representing students with disabilities and English Learners, business organizations and Indian tribes.” DESE is required to describe how these consultations occurred. The draft does not articulate or provide evidence of how DESE meaningfully engaged and solicited input from these groups on this request for a waiver.

Please keep in mind that the Application and Guidance require this input specifically on the states’ request for a waiver. While DESE details how it received input on the Common Core State Standards (CCSS), how it will create some time in the future an Administrative Advisory Panel, and how it participated in the SMARTER Balanced Assessment Consortium with other states, DESE does not specifically detail how it engaged the school community in reviewing this particular draft document or the specific subject of this waiver request. Stakeholder input on MSIP 5 or the CCSS is not the same as stakeholder input on the future use of federal funds and federal programs and accountability measures.

MSBA is particularly concerned about the exclusion of public school board members in this process. To our knowledge, no school board member input has been solicited regarding this waiver until the draft document was released for comment from the general public. School board members make the ultimate and final decisions on tax rates, budgets, and personnel for their individual districts. School board members are the best direct link to the local communities DESE and the U.S. Department of Education seek to serve. MSBA is concerned that excluding this essential group of stakeholders will

result in an unworkable plan, or at least a plan that is perceived to be forced upon Missouri districts, as opposed to being developed with districts' input.

One example of the exclusion of school board members appears on page 37 of the draft document. The purpose, understanding and ownership." School board representation is notably missing from the listed organizations. Is there a reason locally elected school board representatives would not be included?

5. The document may not provide sufficient evidence of a clear, research-based plan.

Page 2 of the Guidance states, "A high-quality request for this flexibility is one that is comprehensive and coherent in its approach and that clearly indicates how this flexibility will help an SEA and its LEA improve student achievement and the quality of instruction for students." MSBA is concerned that the document in its current form does not provide the clarity the U.S. Department of Education is seeking. MSBA is also concerned that the draft does not reference current research or relevant data to support what is articulated.

This document simply does not provide enough details on how DESE plans to improve student achievement, including students with disabilities, English Language Learners and high need students. MSBA encourages DESE and the State Board of Education to utilize interventions that are evidence/research based, lead to improved student learning and quality instruction, and provide ongoing mechanisms for family and community engagement. Merely adopting the Common Core Student Standards, the WIDA ELP Standards and the SBAC assessment does not ensure improved student performance.

A wealth of information on evidence/research-based interventions is available. The United States Department of Education has funded a number of centers that evaluate the efficacy of interventions based on the strength of evidence to support them (e.g., What Works Clearinghouse, Best Evidence Encyclopedia, Doing What Works, National PBIS Center, National RTI Center, Mid-Continent Comprehensive Center). There is evidence that three-tiered models are effective in improving both academic and behavioral performance. For some time, DESE has provided training and resources for district implementation of three-tiered models, but has not listed those as potential means to support the application. The Missouri Department of Education Implementation Audit (Reeves, 2010) offers additional evidence of intervention effectiveness in Missouri.

6. The document addresses college readiness, but n career readiness could be more visible in Principle 1.

The draft document appears to focus solely on preparing students for college within the Principle 1 and makes little reference to meeting the needs of students who seek to be career-ready. Because phrase "college and career ready" is included in the title of the principle, surely some portion of the draft document should be devoted to career preparation. While the draft document does make it clear that DESE has worked with the Department of Higher Education to create standards that better prepare

students for college, career readiness is only addressed minimally at the bottom of page 5 and the beginning of page 6 of the draft document, with little actual substance. MSBA encourages DESE to rewrite the draft document to clearly address career readiness, with a detailed description of how the state's plan will improve instruction for students seeking a career after high school.

7. The document gives the impression of unclear and confusing timelines.

DESE seems to be relying on the MSIP 5 process in this waiver. However, MSIP 5 will not go into effect until 2014. Page 10, Section 2.A.i. of the Application and page 2, Section 2.A.i. of the Guidance require that DESE to implement an accountability system "no later than the 2012-13 school year." Will DESE speed up the implementation of MSIP 5? To do so would exceed the State Board's authority. Section 161.092(9), RSMo, states that accreditation requirements may take effect "not less than two years from the date of adoption of the proposed rule" by the State Board.

There are other timeline issues as well. At the end of page 8 of the draft document, under "Professional Resources" the draft document states, "Missouri educators have been instructed to take the following steps to begin implementation: . . . Implement the kindergarten Mathematics CCSS during the 2011-12 school year." Unless MSBA misunderstands what DESE is saying, this is news and MSBA doubts this deadline will be met. How have teachers, superintendents, principals, and other educators been made aware of these expectations? When and how was the information disseminated? When and how have Missouri educators been trained? Furthermore, content in the application does not match documents on DESE's webpage: CCSS Rollout Schedule, <http://dese.mo.gov/divimprove/curriculum/documents/cur-ela-comcore-ccss-rollout-schedule.pdf>, or the Mathematics CCSS Implementation Plan, <http://dese.mo.gov/divimprove/curriculum/documents/ccr-ccss-math-implementation-plan-2011.pdf>

8. The document could profit from increased clarity, and additional meaningful supporting material.

Page v. of the Application sets out the mandatory information each request for a waiver must include. One of the bullets requires an overview of the request. "This overview is a synopsis of the SEA's vision of a comprehensive and coherent system to improve student achievement and the quality of instruction and will orient the peer reviewers to the SEA's request. The overview should be about 500 words."

While there are sections titled "Overview" on pages 2 and 27 of the draft document, these sections appear to be background information, not an overview of the system DESE will put into place. MSBA encourages DESE to write an overview as instructed and believes it will improve the application. The draft document was extremely difficult to read, and there is much information included that does not directly relate to the principle discussed, or it is at least unclear why the information is provided. A synopsis of DESE's plan would help DESE focus the document on the required elements and remove unnecessary information. Because this overview is required, MSBA encourages DESE to comply.

There are many statements in the draft application that need revision or more explanation to clarify what is meant. For example, on page 4 under the “Students with Disabilities” subheading DESE students.” This seems to imply that students with disabilities do not have access under the current standards and that somehow by adopting the CCSS, this will change. Of course, this is incorrect.

Under the same subheading, MSBA does not understand the following sentence: “The development of technologically enhanced items should be a huge step forward in working with students with disabilities.” What is a “technologically enhanced item”? Why is “item” capitalized? Is this a term of art that needs to be defined? And how will that improve performance for students with disabilities?

On page 6, under “Model Curriculum” the draft states, “In many cases, the core content teachers have remarked that their learning about application in their content has substantially increased student engagement.” While this may be true, it certainly does not reflect well on Missouri teachers if this is a surprise! In fact, it implies that our teachers have been teaching content without any knowledge of its application, which certainly is not true. MSBA recommends that DESE remove this statement as it does not reflect well on Missouri teachers.

Page 7 includes the subheading “School Leaders.” It is unclear in the document who a “School Leader” is. Further, the following sentence is problematic: “Utilizing established leadership initiatives, the model educator standards, indicators and rubrics, and professional organizations, the Department will highlight the role of the school leader in the transition to the CCSSs, developing staff from the awareness level of the new standards to full implementation and a process of continual refinement.” Is DESE trying to say that it will provide professional development to school leaders, whoever they may be? To what “established leadership initiatives” is DESE referring?

On page 8, under “Professional Resources” the draft document includes a bulleted list of “resources” DESE will provide to districts. However, the list does not include actual resources. For example, “Identifying commonalities and connections” is not a resource, nor is “Identifying shifts in teachers and learning.” MSBA recommends that DESE clarify this section.

On pages 6 and 22, the draft document notes that DESE plans to “repurpose” existing staff to other areas. While this may be true, this information does not make the document stronger. MSBA suspects that DESE is using this term to demonstrate that the persons filling these positions will be experienced, qualified, and knowledgeable of the content necessary to perform this new function. However, this phrase could be read to imply that DESE is simply moving staff around, regardless of their qualifications. MSBA encourages DESE to reconsider the use of this term. It is irrelevant whether the staff is newly hired or repurposed. What is relevant is that they are competent and qualified to provide the support needed.

On page 24, DESE includes a chart titled “2011 State of Missouri Proficiency Rate for All Students.” It is unclear why this chart was included as these numbers will apparently change if DESE receives the waiver.

The text on page 10 through the middle of page 12 appears to be informational and marketing material of the SMARTER Balanced Assessment Consortium. The material appears to be written from the Consortium’s view, not DESE’s. So, for example, on page 11 under “Accountability,” the draft document states, “Fully committed to providing each member state reliable, valid, and comparable achievement and growth information for each student.” Obviously, DESE will not provide member states this information. That is the goal of the Consortium. This information does not support the application and should be removed.

Page 9 of the draft document reproduces two forms that were apparently created by DESE. MSBA strongly recommends that DESE remove these forms from the document. Presumably they were included to demonstrate that DESE stands ready to provide adequate professional resources to school districts. However, these forms are not substantive and arguably of minimal usefulness. We strongly suggest that DESE showcase better material and included it in an Appendix, as directed in the Application and Guidance.

On page 42 DESE states, “As a result of the evaluation system, districts will be empowered to recognize and/or compensate those highly effective educators for their contribution to improved student learning.” Currently the Teacher Tenure Act, which requires a salary schedule applicable to all teachers, is a roadblock to differentiated salaries based on performance. See Sherwood Nat. Educ. Ass’n v. Sherwood-Cass R-VIII School Dist., 168 S.W.3d 456 (Mo.App.W.D. 2005) (“The security and stability that teachers gained under the [Teacher Tenure] Act was obtained by trading off certain other things, including, at least to some extent, the right to extra compensation for exceptional competence.”) MSBA encourages DESE to remove the reference to compensation in this sentence, or explain in more detail how districts can legally compensate highly effective teachers.

The section titled “A probationary period for new teachers” on page 40 includes a citation to §168.221, RSMo, which is the tenure statute for the St. Louis School District. Because this section references teacher certification, not tenure, MSBA suspects DESE intended to cite §168.021, RSMo.

The draft document references §168.221, RSMo, again on page 43 under “Policy support for implementation.” However, because this statute only applies to the St. Louis School District (the only metropolitan district in the state), DESE should also cite to §168.114 and §168.126, the statutes that set out the reasons teachers may be terminated in all Missouri public districts except the St. Louis School District. Please note that the process for termination under these separate tenure statutes differ. Under 168.221, RSMo, probationary teachers terminated for “unsatisfactory” work must be notified and given a semester to improve. Probationary teachers under §168.126 are notified and given 90 days to improve. This section should be rewritten to accurately state the law.

Conclusion

MSBA strongly encourages DESE and the State Board of Education to reconsider submitting the request in its current form and to take the time to create a more thorough, research-based plan with broader stakeholder input. MSBA is concerned that the waiver has little chance of being accepted in its current form and even if it is, there will be significant resistance from the education community to implement a plan with so few details. If the waiver is not awarded, and negotiations ensue, DESE might make commitments upon which LEAs have had no input or have no ability to implement.

School districts must plan for the future, and this document simply does not give Missouri school districts enough information to plan for, let alone support, the future of public education. The U.S. Department of Education appears willing to review Flexibility Requests even beyond the February 2012 date. MSBA encourages DESE, along with stakeholders, to use this time to improve the draft document so that the request for a waiver is ultimately successful and, more importantly, creates a plan that is good for Missouri's students.

Sincerely,

A handwritten signature in black ink, appearing to read "Carter D. Ward". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Dr. Carter D. Ward
Executive Director
Missouri School Boards' Association

Katnik, Paul

From: Stevens, Jacquelyn F. [jfstevens@spsmail.org]
Sent: Tuesday, January 10, 2012 7:29 AM
To: ESEA Waiver
Subject: ESEA(NCLB) Waiver

I am a MSTA member and as a teacher I am opposed to the waiver. There are too many "unknown" factors. Also I am opposed to evaluations of teachers being based on student performance especially on standardized tests. We are professionals and are already evaluated based on our performance which is how it should be. It sounds to me that instead of passing it by Jan. 5, 2012, it should be vetoed and re-examined.

Jacquelyn Stevens

Katnik, Paul

From: Bennett, Crystal A. [Crystal.Bennett@slps.org]
Sent: Tuesday, January 10, 2012 3:12 PM
To: ESEA Waiver
Subject: WAIVER

I AM opposed to the waiver request. There are several issues in the application that cause concern for MSTA and our members. Below are specific areas of concern or 'talking points' that can be used by you to submit comments to DESE.

1. If Missouri's waiver application is approved, MSIP 5 would go into effect at the end of the 2011-2012 school year, two years earlier than allowed by Missouri statute. This timeline does not allow school districts with sufficient time to implement the provisions of MSIP 5.
2. Congress is likely to reauthorize ESEA, overturning the waiver plan and enacting new requirements.
3. At face value, the concept of the waiver sounds appealing. However, there are too many "unknown" factors. The U.S. Department of Education has failed to provide many specific details regarding the waiver requirements and Missouri's plan does not provide critical information.
4. Missouri's draft application allows DESE to carry out certain provisions MSTA opposed in their Race to the Top application.
5. While the application suggests a statewide teacher and principal evaluation system that "may" be used by districts, it's likely that the system will be mandated at some point. At a minimum, the state plans to mandate evaluation guidelines.
6. There are no resources or infrastructure to support many components of the plan.

The waiver application includes commitments of Race to the Top and Top 10 by 2020.....MSTA opposed those previously and that position has not changed. Two other specific items in the application which we oppose are *compensation based on evaluation results* and *teacher evaluations tied to student achievement data &/or high-stakes tests*.

Katnik, Paul

From: David.McGehee@leesummit.k12.mo.us
Sent: Wednesday, January 11, 2012 7:34 AM
To: ESEA Waiver
Subject: Response to ESEA Flexibility Waiver Draft #2

As members of the Lee's Summit R-7 School District's Instructional Team, the following individuals have reviewed the revisions made and posted on December 29, 2011 in the document entitled *ESEA Flexibility Waiver Draft #2*:

Dr. Ann-Starlin-Horner, Assistant Superintendent of Instruction and Leadership
 Mr. Stan Elliott, Assistant Superintendent of Secondary Instruction
 Dr. Jill Hackett, Assistant Superintendent of Elementary Instruction
 Mr. Jerry Keimig, Executive Director of Special Services
 Dr. Eric Flack, Director of Curriculum and Professional Development
 Dr. Amy Gates, Director of Instructional Technology
 Dr. Christiana Barger, Director of Assessment and Data Analysis
 Mrs. Laura Maxwell, Partners In Education and Library Media Coordinator.

Having conducted a side-by-side comparison, we would like to formally document our feedback that the concerns originally shared by the Lee's Summit School District regarding the *ESEA Flexibility Waiver* remain the same, having not been impacted by the revisions between Draft #1 and Draft #2. From our perspective, the changes made between drafts were primarily language-based edits, but do not have an impact on recommended policy or suggested practice included in the original draft of the waiver request.

In summary, our original concerns, which remain in the Draft #2 version of the document, include the following:

- The DESE draft waiver request is a vague plan that has long-term implications for Missouri School Districts. There is no reason for such quick action.
- Of particular concern is that Missouri's draft waiver has no financial impact study attached to it.
- In March, DESE took an unpopular MSIP 5 plan to the state board without broad input from stakeholders. DESE appears to be repeating this ill-fated strategy with the waiver request. Too much is at stake to propose a hastily prepared plan without significant input and clarity.
- MSIP 5 would go into effect immediately upon approval of the draft waiver rather than in 2013. Currently districts are preparing for the 2013 implementation.
- Draft waiver request appears to allow DESE to assume a "big brother is watching approach" in which DESE will determine the evaluation system that each school district will use; the compensation employees receive, which employees receive tenure; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.

We do not feel it is in the best interests of the students in the Lee's Summit R-7 School District for the state of Missouri to pursue a NCLB waiver.

Dr. David McGehee
 Superintendent
 Lee's Summit R-7 School District
 301 NE Tudor Rd, Lee's Summit MO 64086

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Katnik, Paul

From: Rodgers, Mindy [Mindy.Rodgers@raytownschools.org]
Sent: Wednesday, January 11, 2012 8:02 AM
To: ESEA Waiver
Subject: waiver

I am a special education teacher in the Raytown School District. I am also a member of MSTA which opposes this waiver. The information presented on the website about the waiver looks like a great idea. However, MSTA believes this waiver will endanger the jobs of quality educators such as myself. I would appreciate your comments.

Thank you,

Mindy Rodgers

Katnik, Paul

From: Linda Williams [lwilliams@oakgrove.k12.mo.us]
Sent: Wednesday, January 11, 2012 10:26 AM
To: ESEA Waiver
Subject: Please Do Not Submit the NCLB Waiver in February 2012

DESE's Proposed ESEA Flexibility Waiver Request seeks to move current federal regulatory, administrative and reporting requirements to state-developed plans. **If this waiver request is approved, school districts may be committed to the concepts outlined in this document for years!**

This proposal is **too much, too fast and too vague**. Also, there is no financial impact study of what this proposal will cost the state of Missouri. As frustrating as NCLB is, getting a NCLB waiver may actually be worse in the long run for the state of Missouri and for the local school districts.

Areas of Concern center around the fact that the Waiver Request is too closely aligned to Race to the Top—an initiative that many educators in our state have indicated over the past two years is actually much worse for the future of Missouri's public school districts than NCLB!

Principle 1: College and Career ready expectations for all students

There is limited detail on Alignment and Transition to College- and Career-Ready Standards. (p. 3)

"The Department is currently developing model curriculum..." "For the first time, all Missouri districts will have curriculum in hand aligned to rigorous standards, and all students will have access to those standards." "Two districts – one rural and one urban—" are developing materials that will be the bases for the Missouri Model Curriculum. (p. 5)

Which districts and how much additional input will be afforded?

What are the demographics of the districts and are these representative of all students in Missouri?

What are Missouri college- and career-ready standards?

"A specific focus for lesson and materials development...is the evaluation of text complexity against current resources." (p. 5)

What will be the financial impact on districts to replace most textbooks to align with the CCSS?

Will all schools buy/use the same textbooks?

The waiver request highlights the integration of curriculum and assessment with career and technical education. (p. 5)

How widespread is curriculum integrated across the state and how realistic is it to fully integrate applied, real-world curriculum with the CCSS?

There are "plans to repurpose an ELP specialist to work on curriculum and assessments alongside content specialists in the academic content areas and in Career Education..." (p. 6)

Will these individuals be district or state staff and how will this program be funded?

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In light of budget constraints how realistic is it to that adequate instructional support will be provided for school staff?

The plan for implementation includes "Recruit administrators to serve on an Administrative Advisory Panel that will support the teacher-leaders..." (p. 6)

Principals, special services directors and ELL coordinators are included; however no career tech directors are included.

"Regional Content Specialists Responsibilities" (p. 7)

The focus is more on what teachers are doing rather than on actual student learning.

"...the Department will highlight the role of the school leader in the transition to the Common Core State Standards..." (p. 7)

It is unclear exactly what will be expected of school leaders or how their role may change.

The department made the decision “to join the SMARTER Balanced Assessment Consortium because of its commitment to performance based assessment...” (p. 10)

What is the financial implication of these assessments?

What will be the time commitment expected to complete in the last 12 weeks of the school year if these are to be multi-day assessments that include various performance events, including written, oral and aural assessments?

“Mandatory...high school for English Language Arts (ELA) and mathematics.” (p. 11)

“To this end, in March 2010, the board recommended increasing the number of end-of-course assessments to three in each of four content areas.” (p. 13)

These would be required 11th grade End of High School Assessments in addition to multiple EOC.

During the discussions of MSIP5 the understanding was that the EOHS would replace the third ELA and math EOC.

Previously the state board had recommended two EOC in each core area.

“Reinstate performance events within current state assessments” (p.12)

How will these be funded?

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“School district and building performance will be reviewed annually through the APR.” (p. 18)

The APR is a district-level accreditation process not a school level accreditation process. Does this represent a move to school level accreditation?

If the federal government accepts the Missouri waiver, the MSIP 5 proposal, which is slated to take effect in 2013, would take effect immediately with no time to prepare for the changes.

“Growth Model” “The department continues in its study to consider how growth data will be incorporated into MSIP 5.” (p. 24)

How does this apply to areas where there is not an assessment that provides data to show growth (foreign language, health, art, etc.)? The current pilot study is limited to grade 3-8 MAP and some indicate that growth models cannot be applied to high school end-of-course tests.

Principle 3: Supporting Effective Instruction and Leadership

“The Missouri model evaluation system will provide a direct link between teacher and student performance.” (p. 27)

The proposed waiver states, “within the next two years all Missouri schools will employ a teacher evaluation system that measures teacher performance against the Missouri Teacher and Leader Standards.” and “Examination of student achievement data...will be central to the process” (p. 36)

Will this information be public? (Once DESE collects this data will be subject to freedom of information requests?)

“...the creation of Missouri’s Educator Evaluation System...” will include “...a methodology for converting data into determinations of effectiveness based on evidence of educator growth.” (p. 37)

It is unclear how this will be done.

“Timeline for Implementation” (p. 38)

- “Suggested guidelines for placement, recognition and compensation based on evaluation results”
- “Suggested guidelines for interventions, support and dismissal protocols based on evaluation results”
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Adding greater pressure to teachers for improving performance may create unintended consequences.

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Multiple measures are recommended; however how much dependence will be placed on test data?

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Does this mean that accreditation will be contingent upon have trained evaluators?

Again, what is the cost of this certification training?

The waiver proposal makes reference to districts certifying to DESE that "local evaluation policies and procedures have ensured that no student has been taught by an ineffective teacher – (one demonstrating no evidence of even minimal growth) for more than one academic year." (p. 40)

How will this apply to teachers in subjects in which there is no growth test (i.e. foreign language, health, art, etc.)?

"Compelling communication will be provided...including sufficient investment of fiscal resources, particularly in the initial rollout." (p. 40)

In light of budget projections what fiscal resources will be available?

The waiver request lists current "Policy support for implementation." (p. 42)

"Guidelines, rules, and/or regulations will be crafted to support the basic framework and minimum standards of Missouri's Educator Evaluation System. Revisions and new language will minimally address:

- "Authority of the Department of Elementary and Secondary education to review and approve district evaluation systems"
- "Protocols for gathering feedback and new information, conducting validity checks and mechanisms for modifying the state's model evaluation system"
- "Cost analysis, including training and reporting, regarding implementation of the state's model evaluation system"
- "Definition of 'teacher of record' "
- "Suggested minimum standards for compensation/tenure decisions to evaluation results"
- "Suggested protocols for layoffs and non-renewal linked to performance evaluation results"
- "Plans for equitable distribution of highly effective teachers to schools and students most in need." (p. 42)

These items seem to suggest that DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.

At this point in time, the concerns cited indicate that we are better off staying with NCLB and encouraging continued modifications by Congress.

Linda K. Williams

Assistant Superintendent
Oak Grove R-VI School District
601 SE 12th Street
Oak Grove, MO 64075
Phone: 816.690.4156
Fax: 816.690.3031

Katnik, Paul

From: Barbour, Robin
Sent: Wednesday, January 11, 2012 12:00 PM
To: ESEA Waiver
Cc: Wieberg, Jackie
Subject: FW: Feedback to State Board of Education Re: NCLB Waiver

From: Linda Williams [mailto:lwilliams@oakgrove.k12.mo.us]
Sent: Wednesday, January 11, 2012 10:32 AM
To: Barbour, Robin
Subject: Feedback to State Board of Education Re: NCLB Waiver

Dear State Board of Education Members:

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The waiver proposal makes reference to districts certifying to DESE that "local evaluation policies and procedures have ensured that no student has been taught by an ineffective teacher – (one demonstrating no evidence of even minimal growth) for more than one academic year." (p. 40)

How will this apply to teachers in subjects in which there is no growth test (i.e. foreign language, health, art, etc.)?

"Compelling communication will be provided...including sufficient investment of fiscal resources, particularly in the initial rollout." (p. 40)

In light of budget projections what fiscal resources will be available?

The waiver request lists current "Policy support for implementation." (p. 42)

"Guidelines, rules, and/or regulations will be crafted to support the basic framework and minimum standards of Missouri's Educator Evaluation System. Revisions and new language will minimally address:

- "Authority of the Department of Elementary and Secondary education to review and approve district evaluation systems"
- "Protocols for gathering feedback and new information, conducting validity checks and mechanisms for modifying the state's model evaluation system"
- "Cost analysis, including training and reporting, regarding implementation of the state's model evaluation system"
- "Definition of 'teacher of record' "
- "Suggested minimum standards for compensation/tenure decisions to evaluation results"
- "Suggested protocols for layoffs and non-renewal linked to performance evaluation results"
- "Plans for equitable distribution of highly effective teachers to schools and students most in need." (p. 42)

These items seem to suggest that DESE will determine the evaluation system each school district will use; the compensation employees receive; which employees receive tenure; which employees are non-renewed; and which employees are assigned to specific buildings.

At this point in time, the concerns cited indicate that we are better off staying with NCLB and encouraging continued modifications by Congress.

Sincerely,

Dinda K. Williams

Assistant Superintendent

Oak Grove R-VI School District

601 SE 12th Street
Oak Grove, MO 64075
Phone: 816.690.4156
Fax: 816.690.3031

Katnik, Paul

From: Katnik, Paul
Sent: Thursday, January 12, 2012 8:39 AM
To: ESEA Waiver
Subject: FW: Waiver

From: Vandeven, Margie
Sent: Wednesday, January 11, 2012 6:44 PM
To: Hensley, Melissa; Katnik, Paul
Subject: FW: Waiver

Please add to comments.

Margie Vandeven | Assistant Commissioner | Office of Quality Schools | dese.mo.gov | 573.751.4234

From: Wilken, Ron
Sent: Wednesday, January 11, 2012 3:01 PM
To: Tina-Avalon R-II - David Garber
Cc: Vandeven, Margie
Subject: RE: Waiver

Dave,
I will forward your email to Assistant Commissioner Margie Vandeven.
Thanks!
Ron

Ron Wilken, Ed. D.
State Supervisor
Office of Quality Schools
Missouri Department of Elementary and Secondary Education
Hwy 54, Box 301
Preston, MO 65732

Office 417-722-1246
Fax 417-722-1247
Cell 417-689-4774
dese.mo.gov

From: Dave Garber [<mailto:dgarber@tinaavalon.k12.mo.us>]
Sent: Wednesday, January 11, 2012 2:58 PM
To: Wilken, Ron
Subject: Waiver

I didn't know how to express my opinion, but I would like to support the waiver (don't know the official name) to move accountability away from Federal jurisdiction and to State Jurisdiction. Could you either pass on to the powers that be, or LMK who to send this too. Thanks.

Katnik, Paul

From: Douglas Garrison [garrisond@carthage.k12.mo.us]
Sent: Thursday, January 19, 2012 8:04 AM
To: ESEA Waiver
Subject: NCLB Waiver and MSIP 5

I am writing to express my concern over the consideration that is being given to the NCLB Waiver and MSIP 5. I am concerned because of what this will do to school districts.

1. If the waiver is approved, school districts will not have sufficient time to implement provisions for MSIP 5.
2. Congress will likely enact new requirements.
3. There are way too many "unknown" factors because specific details have not been provided.
4. The application suggests statewide principal and teacher evaluation plans and takes control away from the school districts. DESE would become a "big brother" to school districts.
5. Due to the lack of resources and infrastructure, many of the components of this plan cannot be supported.

I would like to request that you please take these concerns into consideration.

Thank you,

Doug Garrison
Communication Arts
Carthage Junior High
(417) 359-7050

Katnik, Paul

From: Karen Meeks [kmeeks@caruthersville.k12.mo.us]
Sent: Friday, February 03, 2012 6:41 AM
To: ESEA Waiver
Subject: NCLB

While NCLB is unrealistic as to its 2014 goals, striving to improve the education of all Missouri students should continue to be the main goal of our state's education system. Peace on earth for all the world by 2014 if we would all be "nice " to each other is just as easily accomplished. NOT! Let us be realistic. We need to press on and keep working with our students. We need more emphasis on early childhood education so that children will be ready to learn when they reach the age that requires them to start school whether or not they are emotionally, culturally, or psychologically prepared "to learn." We need a parent pool that helps to prepare their children for learning. We need a society that recognizes the value of education.

That being said, taking away fine arts classes is not the answer to improving test scores either. They need the beauty, diversity, and civility that fine arts exposure brings to their reality. Their lives need to be broaden, not limited. Test scores are not "the be all to end all." Look at your own lives and recall your educational experience and reflect how bland your life would be with out music and art in your world.

Katnik, Paul

From: Jo Ann Cook [joacook72@embarqmail.com]
Sent: Sunday, February 05, 2012 10:27 AM
To: ESEA Waiver
Subject: No child left behind

If the teachers cannot educate the children , get rid of them. Go back to if a student does not pass a class , make him or her return the next year and you will have students That will learn, because they don't want to serve the same grade over.

Improving Tutoring for Low-Income Students: Enhancing Accountability and Effectiveness through ESEA Waiver

Waiver Proposal Stakeholder Feedback – February 8, 2012

The prospect of waivers from key provisions of the Elementary and Secondary Education Act (ESEA) from the U.S. Secretary of Education provides Missouri the opportunity to strengthen its statewide Supplemental Educational Services (SES) program while preserving benefits for the almost **10,000 low-income students currently receiving support in Missouri**. The goal of waiver initiated changes would be to ease district and school oversight and administration, enhance quality and accountability, and enable parents to select providers which are best suited for needs of their child. Such enhancements would build on an existing research-based program to help more low-income students reach MAP proficiency, while forcing providers to show the same level of results as the Preferred Providers of tutoring services. The following issue brief highlights four specific areas for improvement of the SES program, in conjunction with Missouri's waiver application:

Raising the bar on provider quality by developing and implementing a system to evaluate each approved provider based on the extent to which a provider improved student academic achievement as well as LEA evaluations, student, parent, principal, and/or teacher satisfaction. Providers of High Quality Academic Tutoring – In order for a provider (which may include a non-profit entity, a for-profit entity, or an LEA) to be included on the Missouri-approved provider list it must:

- Provide parents and the LEA with information on the progress of the children in increasing achievement;
- Ensure that instruction provided and content used is consistent with the instruction provided and content used by the LEA and aligned with State academic standards;
- Meet all applicable Federal, Missouri, and local health, safety, and civil rights laws; and
- Demonstrate that it meets the following minimum requirements:
 - Evidence that its curricula are aligned to Missouri Curriculum Frameworks;
 - Evidence that it has at least five years of continuous operating experience providing education instruction to youth;
 - Evidence that it uses instructional methods and materials that are research-based;
 - Demonstrate financial stability (which may include a financial audit, evidence of sufficient working capital, or other means); and
 - Employ tutors that meet Missouri-determined qualifications.

Providing for state control of funds; LEAs would apply to the State for tutoring funding.

Missouri Reservation of Funds – Missouri would target 20% of the funds it receives under subpart 2 of Title I, Part A [Allocations] to carry out a system of high quality academic tutoring to eligible students. Under the proposed system, Missouri would:

- Reserve up to 3% of such funds for administration, monitoring, evaluation, and technical

assistance (including the development of a process for the selection and removal of providers); and

- *Allocate not less than 97% of such funds to eligible LEAs to carry out high quality academic tutoring.*

Removing the requirement that LEAs spend an amount equal to 20% of its local allocation under subpart 2 of Title I, Part A [Allocations].

Grants to LEAs – *To receive funds, an LEA would submit an application to Missouri that, among other things, includes:*

- *A description of how the LEA will use not less than 90% of the funds it receives to enable eligible students to receive high quality academic tutoring (selected by parents from among a list of providers approved by Missouri).*
- *A description of how the LEA will provide at least annual notice to parents of the availability of high quality academic tutoring and the identity of approved providers (including qualifications and demonstrated effectiveness of such providers).*
- *A description of the process the LEA will use to develop agreements with providers which must include specific achievement goals and how parents and teachers will be regularly informed of progress.*
- *An assurance that the LEA will allow providers to use school facilities to deliver high quality academic tutoring (either free of charge or for a reasonable fee).*
- *A description of how (in cases where it is not possible to have all providers provide high quality academic tutoring in an LEA's school buildings) the LEA will select providers, taking into consideration input from principals, in a manner that provides parents with as diverse and large a group of on-site providers as possible.*
- *In the case of an LEA which is approved by Missouri as an eligible provider, a description of how the LEA will ensure a fair and transparent process in the administration of the high quality academic tutoring program.*
- *A description of the LEA's plan to inform eligible students of the availability of high quality academic tutoring which includes posting the common statewide student application on the agency's website; conducting enrollment of eligible students throughout the year; and ensuring high quality tutoring services are provided in a timely manner.*

Focusing services on low-income students with the greatest academic need (as opposed to schools that are not making AYP).

Reallocation of Funds – *Funds not obligated by an LEA must be reallocated to LEAs with approved applications*

Since 2004, Rocket Learning has been a part of this effort delivering SES services to over 150,000 families across the country. We have achieved very high stakeholder satisfaction and consistent achievement gains of over 20% in literacy and 30% in math. As one of the nation's leading providers of SES, we have had an opportunity to learn several best practices and believe the improvement areas listed here will ensure the highest quality services are delivered to the students and families in greatest need.

I would like to again thank you for the opportunity to share our guidance improvements with you. Over the years, we have seen time and time again that these services can make a world of difference in the lives of students that would otherwise not have access to additional instructional support. We are very excited about the opportunity for these services to be improved upon.

If you have any questions or would like to discuss in more detail, please feel free to contact me at 646.291.9004 or Matthewfields@rocketlearning.net.

Your partner in education,

A handwritten signature in black ink, appearing to read 'Matthew Fields', with a stylized flourish at the end.

Matthew Fields,
Co-founder and President
Rocket Learning Partners

Draft 3 - EASA flexibility

Page 13 - Connections with Institutions for Higher Education

With the transition to the Common Core State Standards in English-language arts and mathematics, the Department, in conjunction with the Missouri Department of Higher Education, is moving forward with a three-stage process to improve the preparation of incoming teachers:

1. A gap analysis is currently under way that aligns CCSS with both the current Missouri Subject Specific Competencies (content specific state standards) and the national content specific standards from the National Council of Teachers of English and the National Council of Teachers of Mathematics.
2. At the conclusion of the initial gap analysis, K-12 district representatives will review the alignments and provide a broader perspective between teacher preparation expectations and effective classroom practice.
3. Based on this alignment work, the Department will review the current state content standards for teacher preparation in order to ensure that teacher preparation program outcomes are aligned to the performance expectations and student outcomes as defined by the CCSS.

The collaborative efforts of the Department and institutes of higher learning represent a real change in the preparation of teachers and leaders. This collaboration will have a dramatic effect on the preparation of educators in the state and will create a markedly different culture for student learning in the state.

This might be better worded to say that the Department, in conjunction with the Missouri Department of Higher Education, is continuing/resuming a three-stage process to . . .

The above-mentioned "collaboration" is not new. It has been happening in Missouri for the past 10 years! It was stopped about two years ago during the transition period. It was previously handled under the umbrella of MACCE via the certification section. The process (which involved major subject areas - elementary, math, English, special education - in which teachers obtain Missouri certification) provided colleges with the most up-to-date competencies from each of the learned societies (such as the National Council of Teachers of English/Mathematics).

Page 17 - Aligned System of Accountability (last sentence)

Recognition will be provided in both high-performing LEAs and in schools , where appropriate, are most improved. --Not clearly written.

Page 36 - Overview (second paragraph)

In July 2010, the Department organized a work group of key stakeholders that included all major educational organizations in the state . . .

This might be better worded to say that in 2008, the Department began work on teaching standards and in 2010 reorganized a work group of . . .

The above work actually started under the direction of Dr. Kent King and was in limbo until the reorganization in 2010. The correct date is provided in the summary on page 47.

Overall

In Part 3, while some of the graphics are interesting and colorful, the previous portions of the Waiver do not include color or graphics -- It seems inconsistent!

While cutting and pasting, it appears that parts of this document are typed in 11.5 and other parts in 11 font size. It also might be a blend of Times New Roman and Cambria font styles.

Katnik, Paul

From: Troy and Melissa Wakefield [thewakefields@live.com]
Sent: Thursday, February 09, 2012 9:54 PM
To: ESEA Waiver
Subject: ESEA 3

This appears to be a much more specific final draft. I did note a few grammar errors. As a parent, I am concerned with what happens to the student who begin this testing process at the advanced level? Can we include a provision that will continue to provide the challenging environment they will need?

As a teacher of an alternative school I still worry about the effect our student turnover rate will have on student, teacher and school AYP. With a specialized environment like the one I teach in, it will be difficult to establish true performance of our student population or faculty, with such rigid evaluation criteria.

Overall, the step is in the right direction.

Mel in Mo.

Katnik, Paul

From: Dawn Berhorst [dawn.berhorst@jcps.k12.mo.us]
Sent: Monday, February 13, 2012 11:56 AM
To: ESEA Waiver
Subject: Feedback on Flexibility Waiver Request

I have a couple of suggestions in regards to the waiver request.

1. Keep students in the IEP and LEP subgroups, even after they successfully exit those programs. As the subgroups are defined now, we are not getting credit for our successes: those that no longer need an IEP or are identified as LEP.
2. Use an MPI of 400, rather than 450 to identify the gap. Although we should continue to work to increase the achievement of all students, we do not want to hold ourselves to a higher than Proficiency standard for Federal accountability, especially when we point out that our standards are already at a higher level than many other states.
3. I would like a definition or explanation of which students would make up the "high needs" subgroup. I certainly hope this is not a duplication of other subgroups we are already held accountable for.
4. I would like the Department to request a waiver of the 1% Parent Involvement expenditure requirement, provided the LEA is able to demonstrate a strong parent involvement plan that does not require the full 1%.

Thank you for the opportunity to provide feedback.

Dawn

Dawn Berhorst
Assistant to the Superintendent
Student Information, Planning and Assessment
573-659-3043 (telephone) 573-659-3044 (fax)
dawn.berhorst@jcps.k12.mo.us

Jefferson City Public Schools: Inspiring Possibilities... Defining Success

Katnik, Paul

From: Douglas Thaman [dthaman@mocharterschools.org]
Sent: Tuesday, February 14, 2012 4:42 PM
To: ESEA Waiver
Cc: Douglas Thaman
Subject: Fwd: MO - Voluntary ESEA Waiver

The Missouri Charter Public School Association has had an opportunity to review the 3rd draft of the waiver request. We have been working to understand how ESEA Flexibility might affect charter schools. In addition to reviewing the federal guidelines for SEAs (State Education Agencies, i.e. the Missouri Department of Elementary and Secondary Education) we have reviewed the waiver proposals already submitted by the first 11 states. One important observation is that none of the first 11 SEA applications addressed how their proposed policies would affect low-performing charter schools.

The current draft of the Missouri waiver seems to follow this trend. MCPSA is concerned that the result of the waiver, without charter school reference, could inadvertently harm charter school autonomy and accountability. It seems important and appropriate to include language in the waiver giving specific attention to the unique aspects of charter schools. For young charter schools that are struggling, the waiver would require state-mandated improvement plans. Although improvement plans are important, the use of improvement plans designed for district models could greatly reduce charter schools' autonomy over their educational program. For consistently low-performing charter schools that come up for renewal, the waiver would require multi-year corrective action plans, identical to what would be utilized with school districts, potentially restricting a charter school's opportunity for improvement and allowing a low-performing charter school to continue in operation for an extended period of time/years when they should really be held accountable and in some cases closed. In short, our concern is that the use of a state-mandated plan as the response to low performance at a charter school could undermine both charter school autonomy and accountability.

MCPSA has been working on the development of suggested language we would like to see included in the Missouri waiver emphasizing the importance of charter school autonomy and accountability as defined in Missouri's charter school law. The suggested language would state:

Nothing in this plan or its implementation shall interfere with the autonomy and accountability of charter schools in the State of Missouri as defined by Missouri charter school law and regulations. Specifically, the autonomy provided to charter schools under Missouri law and regulations and through each school's charter contract shall not be diminished as a result of any charter school's identification as a Priority or Focus school, or the implementation of any improvement plan under this flexibility process. This plan shall be implemented in a manner that protects charter school autonomy and the authority of charter school Sponsors to hold low-performing charter schools accountable under the timeframes and according to the performance expectations in their charter contracts and under current Missouri law. The identification of a charter school as falling within the category of Priority or Focus schools under the provisions of this flexibility application, and the subsequent improvement planning and implementation of any improvement plan by such a school, shall not be used as evidence to delay or avoid Sponsor intervention if a school is failing to meet the terms of its charter agreement.

We would sincerely appreciate an opportunity to discuss this with you and work toward the inclusion of language specific to charter school autonomy and accountability.

Thanks, look forward to hearing from you,
Douglas Thaman

--
Douglas P. Thaman, Ed.D
Executive Director
Missouri Charter Public Schools Association
1804 Lafayette, Second Floor
St. Louis, MO 63104
314-261-3657

--
Douglas P. Thaman, Ed.D
Executive Director
Missouri Charter Public Schools Association
1804 Lafayette, Second Floor
St. Louis, MO 63104
314-261-3657

Katnik, Paul

From: Tobi Layton [fifthgrade@zalma.k12.mo.us]
Sent: Wednesday, February 15, 2012 10:10 AM
To: ESEA Waiver
Subject: Against the ESEA waiver

To Whom it May Concern:

I have been a fifth grade teacher in my district for ten years. My husband teaches high school science in a nearby district. While I take issue with the conditions in the No Child Left Behind document, I am not in support of the ESEA Flexibility Waiver drafted by DESE. This document will not accomplish what I believe is necessary for success in Missouri schools:

restoring local control. It will not free us from the unreasonable expectations of the federal government, and it could be quite expensive for school districts. Please do not go forward with the waiver request. We'd rather stick with our old problems than adopt a new, worse, more expensive set of issues!

Tobi Layton

5th grade teacher
Zalma Elementary School
fifthgrade@zalma.k12.mo.us

Katnik, Paul

From: Johnson, Janet [jjohnson2@spsmail.org]
Sent: Friday, February 17, 2012 8:49 AM
To: ESEA Waiver
Subject: ESEA (NCLB) Draft Waiver Application

To the Department of Elementary and Secondary Education,

I oppose Missouri's NCLB waiver application because I see no evidence that it would make a positive difference to my students. I see no evidence of resources to support your waiver application. I do not see that this was thought through completely, for both Congress and the state will most likely have new requirements and mandated evaluation guidelines that would negate what you are trying to push through right now. School districts will not be adequately prepared to implement provisions of MSIP 5; thus, the teachers would be inadequately prepared. So again I say I see no evidence that Missouri's NCLB waiver would make a positive difference to my students.

Respectfully,
Janet Johnson
4th grade teacher
Cowden Elementary
417-523-3500
Springfield R12 District

Katnik, Paul

From: DESE Communications
Sent: Friday, February 17, 2012 10:31 AM
To: ESEA Waiver
Subject: FW: Missouri's waiver request

From: Julie Halley [<mailto:JHalley@putnamcountyr1.net>]
Sent: Friday, February 17, 2012 10:28 AM
To: DESE Communications
Subject: Missouri's waiver request

Missouri DESE officials,

To Whom It May Concern:

One aspect to Missouri's plan to submit to the ESEA in response to the No Child Left Behind Act concerning teachers is to include student performance as an evaluation tool. This is an unfair evaluation tool in the performance of teachers. Here are just some of the repercussions it will have on the effect of teachers everywhere:

1. Schools will no longer attract the best teachers because of the continuing low pay and too much pressure put on them from test results.
2. Teachers have NO control over the intelligence level or behavior influenced by home life. Sometimes there are just lower IQ levels overall in a classroom. This is plain old biological science.
3. Drugs are having a huge effect on students' ability levels in today's schools.
4. Teachers will not want to teach at grade levels where testing results come from such as 3rd, 4th, or 5th grade levels. There will be an increased amount of turnover in teachers which will create lower test scores because of the lack of continuity.
5. Districts with only one school choice available will be at a disadvantage; punished unfairly, because they do not have a choice of students. All students of rural schools attend the same school.
6. Teachers have no control over the maturity level of their students in any one year. (I have my own testimony from my own biological student to attest to this.)
7. A community that has loving volunteer foster parents who take in children from wherever necessary will, in the end, be detrimental to the school test scores. These children are usually experiencing so much at 'home' that taking a test is of little interest to them. How can a teacher control or have any affect to this student's test scores?
8. In reality, you cannot reinforce one year's worth of testing results and attribute those scores to that one teacher. Education is a constantly spiraling continuum and children mature at different levels.

At some point, the state and federal governments are going to have to realize that children are different. There is no one cookie-cutter design. Children are different and the governments seem to want to control these children and make them all alike in elementary school; then in high school

teachers are expected to drill “thinking out-of-the-box” qualities back into them. This seems like a dog chasing his tail. Our educational systems want teachers to form students one way, and only one way at the elementary level, then completely change their way of thinking at the high school level. Difference is what makes the world go round. Children mature at different levels/ages, they have different emotional states at different ages, and children have varied experiences that contribute to these factors. In one classroom, a single teacher may have children with IQ levels ranging from 60 – 120 (on average). We are expected to work miracles with these children. This is just not possible with even the best, most effective, highly qualified teacher on a yearly basis.

If principals and teacher evaluators do their job effectively, then classrooms will have good, “highly qualified” teachers teaching the students. The evaluation system needs to be over-hauled to reflect this. Let administrators put their education to use and put “highly-qualified” teachers in classrooms!

I have provided many reasons why a teacher’s effectiveness should NOT be based on student scores. I do not believe that this is an accurate or fair way to evaluate a teacher’s effectiveness or a teacher’s salary. I became a teacher to have a positive influence on children’s lives. I have earned my bachelor’s and master’s degrees, and would like to be treated as a professional; not an unqualified laborer. Teachers do not get the respect they deserve; instead, only negative comments are given any news time. If the percentage of teachers who commit any type of acts against children was put into a ratio of ‘those who do versus those who do not,’ it would be a very small percentage. Yet, that is never seen on the news; or the fact that we as teachers contend with parents who abuse their children in many different ways but give those same children time, patience, and a safe place each school day while trying to show those children that we do care about them.

Sincerely,

Julie Halley
Rural, public school teacher of 20 years



MISSOURI ASSOCIATION OF SECONDARY SCHOOL PRINCIPALS

MASSP, 2409 West Ash ST, Columbia, MO 65203-0045
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Jim L. King, Ed.D., Executive Director (jking@moassp.org)
 Phil Lewis, Director of Programming & Development (plewis@moassp.org)

February 18, 2012

Dr. Chris Nicastro, Commissioner
 Department of Elementary and Secondary Education
 PO Box 480
 Jefferson City, MO 65102-0480

Dear Commissioner Nicastro:

Thank you for meeting with the MASSP Board of Directors in mid-January. During that meeting the group discussed the ESEA Flexibility Waiver Request and I have waited to see how things evolved with more drafts. While there have been some positive changes in each draft, such as a fifth year to count struggling seniors and serving IEP students (up to 3% of total population) until age 21, based on the current draft #3 and discussion on February 16 I am writing to express these concerns:

- College Readiness and Career Readiness are not the same. While efforts have been made in some areas, CTE curriculum has not been fully integrated across disciplines and no plan is apparent to support career readiness.
- The Common Core State Standards will increase rigor for all students. Funding for additional and expanded assessments, including reinstating performance events, is lacking.
- When the Smarter Balanced Assessment Consortium tests (or MAP assessments are modified to incorporate CCSS) are introduced, the emphasis on critical thinking, problem solving and close reading of complex text may result in an overall decline in achievement levels during the same time that schools are expected to improve overall student achievement by 25%.
- While the rationale to request a waiver is to remove restrictions under NCLB, it is unclear that the expectations of improvement will be less than NCLB and may prove to be more challenging for schools as the scoring guide is yet to be finalized and tested.
- Regarding evaluation of teachers and principals, significant professional development needs to be more extensive with on-going support and there are concerns about the yet to be recommended model, or tool, to be used for evaluation.
- Both time and financial assistance are needed for professional development to introduce, train and implement the CCSS for all stakeholders as well as the training required for principals in using evaluation tools and to be "certified" evaluators.

The document is written such that there are a number of points that imply things are different from what seems to be reality for Missouri schools. Comments and references such as "Information...made available to all Missouri districts" would suggest to outside readers that key programs have been introduced, adopted and implemented. Information being made available or posted on the web does not suffice to move schools forward. Instruction or remediation by invitation does not guarantee adoption.

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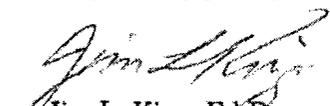
Commissioner Nicaastro

Page 2
February 18, 2012

We are concerned that this ESEA Flexibility Waiver Request is too vague and the potential financial impact on school districts leaves too many unanswered questions. Assurances are needed before the Department submits a waiver request that is based on an untested accountability system. There is a great deal of uncertainty because the scoring guide may not be available until June and according to the waiver request an evaluation model and/or tool must be submitted by the end of the school year. All stakeholders should have a complete understanding of the commitments the state of Missouri is making and the consequences of those commitments.

The general consensus of the MASSP Board of Directors was that it may be preferable to have one more year of sanctions under NCLB rather than rushing ahead with a waiver request that is based on an untested scoring guide. Delaying, perhaps until the September opportunity, would allow more time to get all components finalized and understood prior to submitting a waiver request. Although we favor a reduced emphasis on federal accountability standards and requirements, we feel very strongly that the proposed process includes too many unanswered questions.

Respectfully yours,



Jim L. King, Ed.D.
MASSP Executive Director

Cc: State Board of Education Members
Karla Esslinger
Margie Vandeven
Sharon Hoge