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Mitchell D. Chester, Ed.D.
Commissioner

MEMORANDUM

To: Members of the Board of Elementary and Secondary Education
From: Mitchell D. Chester, Ed.D., Commissioner
Date: May 30, 2014
Subject: Morgan Full Service Community School Level 5 Turnaround Plan Appeals

On Monday, May 19, 2014, the Holyoke Teachers Association (HTA) and the Holyoke School Committee filed appeals to the Level 5 Final Turnaround Plan for the Morgan Full Service Community School (Morgan). For the reasons provided in detail below, I recommend that the Board of Elementary and Secondary Education (Board) adopt the modification proposed by the Holyoke School Committee. I also recommend that the Board adopt components of two modifications regarding the pre-kindergarten program and wraparound services proposed by the HTA. I recommend that the Board decline to adopt the remaining modifications proposed by the HTA because those modifications will not improve the Plan. I have developed a comprehensive, focused turnaround plan designed to promote the rapid academic achievement of students at Morgan. This plan invests in the Morgan School staff and focuses on the needs of Morgan's students.

Background

G.L. c. 69, § 1J, as amended by St. 2010, c. 12, § 3, An Act Relative to the Achievement Gap, provides for sweeping changes to the operations and structure of a "chronically underperforming" or Level 5 school in the Commonwealth.¹ The law requires that I take

¹ "Level 5" refers to the placement of the school in the state's Framework for School Accountability and Assistance.

decisive action by creating a turnaround plan for a Level 5 school, and provides the authority for necessary changes to be implemented at the school. Throughout the Achievement Gap Act, the Legislature repeatedly emphasized the necessity to act quickly in order to “maximize the rapid academic achievement of students” in the school. Timely action is essential to ensure that all students, including current students, are afforded the opportunity and advantage to improve academically. Further, the Legislature recognized that significant change would be essential in order to create schools where student achievement could be maximized, as the status quo in these lowest performing and least improving schools is perpetuating the achievement gap that the Act was designed to address.

In November 2003, the Board of Elementary and Secondary Education designated the Holyoke Public Schools as an underperforming district. This decision was made after a district review revealed seriously inadequate systems to deliver an effective education to the district’s students. As a result of this designation, the Department of Elementary and Secondary Education has had over a ten year partnership with the district conducting accountability reviews and delivering assistance and resources to help Holyoke build the essential leadership, curriculum, and instruction capacities in its central office and schools. Support was delivered using a mix of nationally recognized expert turnaround partner organizations² as well as providing direct ESE support and monitoring.

Our assessment of the combined impact of the Department’s and the district’s partnership, unfortunately, is quite mixed. The district’s leadership during the early years of ESE engagement was unable, and often resistant, to making the best use of ESE resources and interventions. Holyoke Public Schools has only very recently begun to put the centralized systems and functions in place in curriculum and instruction, human resources, and finance to be able to support the critical school improvement needed across the district. Building effective systems at the district level is slow work and was in no way rapid enough to address the dire student achievement results at the Morgan School during its Level 4 status. While the district is laying the foundation for the needed system reform, the students at the Morgan can no longer wait. Therefore, I am exercising the more robust tools of the Level 5 statute to ensure that the Morgan students can make the rapid improvement they deserve. This is the first opportunity in the history of the Commonwealth’s involvement with the Holyoke School District that we have

² America’s Choice 2005-2010 and District Management Council (DMC) 2011-present

had to activate the more aggressive and deliberate interventions for which the 2010 Act anticipated the necessity.

It is important to remember that before a school is designated chronically underperforming, a school must be designated underperforming (Level 4), implement a Level 4 turnaround plan, and fail to improve significantly. I decided to place the Morgan into Level 5 status due to its low achievement rates and failure to meet measurable annual achievement goals, despite its status as a Level 4 turnaround school since 2010. The Morgan has been providing an insufficient instructional program, the result of which is unacceptably low student academic performance.

For example, by the end of the 2012-2013 school year, the Morgan's MCAS results were alarming. Of the 232 Morgan students in grades 3-8, 80 percent scored in Needs Improvement (NI) or Warning (W) in English Language Arts (ELA), and 85 percent scored in NI or W in Mathematics. All of the fifth grade students and 98 percent of the eighth grade students scored NI or W in Science and Technology/Engineering. The previous year saw similar MCAS results, with 78 percent of students scoring NI or W in ELA, 86 percent in Mathematics, 98 percent for fifth grade science and technology/engineering, and 97 percent for eighth grade Science and Technology/Engineering. The results for the Morgan's subgroups are even more concerning.

On the 2013 MCAS, only two percent of the Morgan's English language learner (ELL) students scored Proficient (P) or Advanced (A) in ELA and four percent P or A in Mathematics; ELL students comprised over 40 percent of the school. Throughout all of the grades at the Morgan, only two percent of students with disabilities scored Proficient (and none Advanced) on the ELA and Mathematics MCAS. For the fifth grade and eighth grade Science and Technology/Engineering MCAS, zero students with disabilities scored either Proficient or Advanced; Students with Disabilities comprised almost 23 percent of the Morgan's student population.

The 2012 and 2013 MCAS results for the earlier grades at Morgan indicate many areas of very low achievement. Specifically in 2013, after three years of Level 4 Turnaround Plan implementation, 98 percent of Morgan third grade students scored in NI or W in Reading. **Only two percent of Morgan's third grade students were reading on grade level.** Additionally, 97 percent of Morgan fourth grade students scored in NI or W in ELA; 93 percent of fourth grade students scored in NI and W in Mathematics in 2013. In grades 7 and 8 at the Morgan, while

2013 MCAS results are slightly less dire than in the lower grades, the majority of students still score in NI and W. For example, 69 percent of seventh grade students scored NI or W in ELA; 83 percent of seventh grade students scored NI or W in Mathematics. Similar percentages of the eighth grade students scored at those levels on the 2013 MCAS.

The school and district had significant authorities and opportunities to improve during the three years that the Morgan was designated as Level 4. Yet, after it was designated Level 4, Morgan failed to implement the comprehensive, rapid changes needed to create substantial turnaround. By the end of the 2012-2013 school year, after three years of turnaround effort, the Morgan was only able to meet 49 percent of the measurable annual goals (set by both ESE and the school itself) that were included in its Level 4 Turnaround Plan; this declined eight percent from the previous school year. In February 2013, the school's Monitoring Site Visit indicated that "staff do not understand the connection between the school improvement plan, achieving school goals, and their work in the classroom."³

In addition, as identified in the February 2013 Monitoring Site Visit Report and cited by the HTA in its appeal, the school failed to maximize additional learning time for its students. While some additional time was added to Morgan's schedule for activities such as a skills block and interventions, staff were unclear about how students' needs were matched to appropriate interventions, and the principal reported that the skills block was not being used effectively in the middle school grades.⁴ As part of the Level 4 Working Agreement, although the teachers were paid an additional \$4,018 per year for working 140 additional hours as part of the turnaround plan strategy, that additional time did not lead to improvements in student performance.⁵ Additional financial resources were not used effectively to benefit students: the district failed to utilize and subsequently returned almost one-quarter of Morgan's School Redesign Grant funds in Fiscal Year 2012 and again in Fiscal Year 2013.⁶ Further, the school failed to implement a coherent and well-aligned curriculum that is necessary to accelerate

3 Monitoring Site Visit Report, page 3, Attachment E in HTA appeal package.

4 Ibid, page 11.

5 Teachers also receive additional pay for additional duties. As a result, teachers receive average additional pay of \$5,300 per year.

6 Morgan received approximately \$420,000 per year in School Redesign Grant funds in Fiscal Years 2012, 2013, and 2014. The district returned nearly \$100,000 of unspent funds in FY 2012, and again in FY 2013.

learning and significantly raise achievement for all students. Despite the efforts of the past three years, students are still achieving below grade level expectations.⁷

As a consequence, in October 2013, I designated Morgan Full Service Community School a Level 5 school; and working with Project GRAD USA, the organization I named as Receiver for the Morgan in January 2014, developed a Turnaround Plan for the school that is designed to maximize and accelerate student achievement. With Project GRAD, I considered recommendations from the local stakeholder group (LSG). I also considered modifications to the preliminary Level 5 Turnaround Plan proposed by the LSG. I incorporated suggestions and modifications consistent with swift improvement in student performance, but rejected language that maintained current practices and policies which have led to the school's unacceptably low performance.⁸ The turnaround work at the Morgan will be realized only through substantial, schoolwide reform.

The Morgan Level 5 Turnaround Plan includes the decisive measures that are required to deliver an educational experience that prepares all Morgan students to succeed. Our first job, as this school enters receivership, is to secure the basics of a sound academic program and a well-functioning school. We need to establish an effective instructional program and quickly move it to higher levels of functioning. Strong, focused implementation of the strategies contained in the Morgan's Turnaround Plan will provide the best opportunity to address the school's underperformance through innovation, a renewed sense of urgency, and drive for excellence to ensure *all* Morgan students receive the high quality education they deserve.

Why implementation of the Morgan Final Level 5 Turnaround Plan will lead to the rapid academic achievement of the school

Given the depth and breadth of reform needed to turnaround the Morgan, I believe there are five focus areas that are mostly likely to result in both short-term gains and long-lasting improvement: 1) recruitment and development of outstanding professional talent; 2) development of systems to support professional learning and responsive practice; 3) creation of a STEM center of excellence; 4) provision of targeted and aligned resources; and 5)

⁷ There is a suggestion in the HTA's appeal that the Morgan Turnaround Plan places the blame for the lack of results on the teachers. That is not the case. In my introduction to the turnaround plan, I stated that "I know this work is challenging, and I do not assume that the Morgan's status as a Level 5 school is due to a lack of effort or concern by the adults working there." The important point, however, is that Morgan's students need and deserve a stronger education, and I am confident that we can do better than the progress made in the past several years.

⁸ I have included my response to the LSG as Exhibit 1 to this memorandum.

implementation of enhanced strategies for family and community engagement. The Morgan Level 5 Turnaround Plan I have created is focused on these key Priority Areas.

With Morgan's student performance data at distressingly low levels, there is nothing more important than improving the school's instruction. Recruitment, development, and retention of strong teachers is critical. Having high quality teachers in the school, however, is not enough. These teachers need to be supported by systems and resources that allow their teaching practice to grow, and they need to be given opportunities to constantly refine their practice. They need the time to collaborate in order to create and present a coherent, comprehensive education to students. And they need instructional leadership and coaching that will help them hone their craft and be the best teachers they can be. Targeted resources will allow students to learn to their full potential. Engaging families and community partners in this work will be essential to the effectiveness of Morgan's turnaround.

In addition, there are several reasons why I believe creating a STEM (Science, Technology, Engineering, and Mathematics) center of excellence at Morgan will greatly improve students' educational opportunities and outcomes. First, Morgan's current Mathematics and Science MCAS scores are simply unacceptable, a concerning trend we have seen over time, with the vast majority of students scoring Needs Improvement (NI) or Warning (W) in Mathematics last year, and almost all (100 percent of fifth grade students and 98 percent of eighth grade students) scoring NI or W in Science and Technology/Engineering. Second, much of the STEM material at the Morgan will be taught through project-based learning, an approach that engages students and helps them see the relevance of the material to their own lives. They will learn real-world skills by working in groups and serving as the stewards of their own education; these skills can be applied to subjects outside of the STEM arena as well. Third, beginning a robust STEM education from an early age will allow the Morgan students to continue to learn STEM fields in high school and further education, in turn preparing them to be highly competitive in an increasingly technical workplace.

I have selected the non-profit organization Project GRAD to join me in this work, based on their experience and their vision for the Morgan. Since 1991, Project GRAD has led whole-school reform efforts in more than 130 elementary schools and more than 40 middle schools across the country. In these elementary and middle schools, Project GRAD has put in place comprehensive, leading edge curricula in literacy and mathematics; built educator capacity

through ambitious professional development strategies; implemented innovative short cycle formative assessments and data tracking; put in place research-based programs in classroom management and social services; and created and implemented a best-in-class model for community and parent engagement. Project GRAD has traditionally worked in pre-K-12 feeder patterns and its efforts have repeatedly resulted in positive school and neighborhood transformations and long-term, sustainable achievement results and higher education outcomes. For instance, at Maynard Elementary School in Knoxville, Tennessee, approximately 43 percent of students were proficient in mathematics and approximately 45 percent of students were reading on grade level in 2003. After two years of working with Project GRAD, the school saw significantly improved results, increasing to 89 percent proficiency in mathematics and 90 percent proficiency in reading. Former Project GRAD students – including those who were part of Project GRAD in elementary and middle school – are attending more than 200 institutions of higher education, including the nation’s top colleges and universities. Project GRAD students graduate from college with majors in science, technology, and engineering at a rate that exceeds the national average for minority students. I am confident in Project GRAD’s ability to create dramatic change at Morgan.

In addition, the Morgan will be led by a principal with strong elementary and middle school experience. Alyson Lingsch, a longtime Massachusetts educator and accomplished turnaround leader, will be the next Principal of the Morgan Full Service Community School. For the past four years, Ms. Lingsch has served as a Level 4 Principal in Springfield Public Schools, leading the turnaround efforts at Kiley Middle School and Milton Bradley Elementary School. Under her leadership, Kiley and Milton Bradley made substantial student achievement gains, as measured by MCAS results, across all subject areas and sub-groups. Ms. Lingsch has a Bachelor of Science degree in the Psycho-Social Dynamics of Learning, a Masters in Education with a concentration in Science and Technology, and additional post-graduate training through the National Institute for School Leadership. She holds teaching certification for grades 1-6 and Special Needs K-9 as well as a principal certification for pre-kindergarten-6 and grades 5-8. In addition, Ms. Lingsch has completed ESE’s Sheltered English Instruction endorsement for school administrators. Project GRAD and I believe that, by combining outstanding teaching, professional development, an engaging model, continuous reflection on data, and an emphasis on community involvement, Morgan can become a school where rapid academic achievement is the

norm.

Holyoke School Committee’s appeal to the Morgan Full Service Community School Level 5 Turnaround Plan

Working with my staff and in consultation with Project GRAD, I have reviewed the modification to the Turnaround Plan proposed by the Holyoke School Committee, and recommend that its proposal be adopted.

The Holyoke School Committee proposed that the Turnaround Plan be modified by including the creation of a Special Education Parent Advisory Council for the Morgan. The School Committee indicated that this advisory council would be launched to cultivate parent leadership and advocacy around serving students with disabilities. The Holyoke School Committee, Project GRAD, and I share the belief that increasing family engagement in the school, including the engagement of families of students with disabilities, is essential to the Morgan’s successful turnaround. Therefore, I recommend that the Board adopt the School Committee’s proposed modification. Since the School Committee did not propose specific language to include in the Turnaround Plan, I have included a proposed new strategy that captures the School Committee’s modification and clarifies that the parent advisory council that will be established at the Morgan is distinct from the district-wide Special Education Parent Advisory Council that is already in place.

Insert (new) Key Strategy 5.2:⁹ School Site Council and Advisory Committee on Students with Exceptional Learning Needs: The School Site Council described in the previous strategy will also help launch an Advisory Committee on Students with Exceptional Learning Needs. This Committee will be composed primarily of parents of Morgan students with disabilities, and may include other Morgan parents, representatives of organizations who provide services for students with special needs, teachers, and any other interested parties. The Committee's duties shall include but not be limited to: working regularly with the Morgan administrative team to ensure high quality education for students with disabilities; providing input and feedback to administrators and teachers about specific educational strategies and supports for students with disabilities; and serving as liaisons for families of children with

9 If this modification is adopted, the remaining strategies in Priority Area 5 would change their strategy numbers. “Engagement with Morgan families” would become Strategy 5.3; “Creation/reinvigoration of other key community partnerships” would become Strategy 5.4; “Partnership with an early childhood intervention program” would become Strategy 5.5; and “Newcomer support” would become Strategy 5.6.

special needs on other Morgan and district committees. This committee will complement and work closely with the district-wide Special Education Parent Advisory Council (SEPAC), advocating particularly for the needs of Morgan students.

HTA's appeal to the Morgan Full Service Community School Level 5 Turnaround Plan

Working with my staff and in consultation with Project GRAD, I have reviewed the modifications to the Turnaround Plan proposed by the HTA and determined that components of two of the proposed modifications should be adopted. In this memorandum, I respond to each requested modification to the Turnaround Plan to explain my rationale for this determination.

To begin, however, there are several general principles that are important to bear in mind. First, many of the modifications requested by the HTA would result in unacceptable delay. Numerous proposed modifications would require redrafting sections of the plan and sending those sections back to the local stakeholder group (LSG) and other parties for consideration of further modification.¹⁰ These proposed modifications should be rejected because (1) they are not consistent with the statutory process which requires finality following an appeal to the Board; and (2) they would prevent Project GRAD from acting quickly to implement the turnaround plan so as to maximize the rapid academic improvement of all Morgan students.

Overall, the HTA's requested modifications to the Turnaround Plan fail to take into account that the Turnaround Plan must be financially sustainable. The HTA's appeal seems to be based on the premise that Level 5 status comes with unlimited fiscal resources, as the HTA requests that the Turnaround Plan be modified to include a return to larger 2010 staffing levels; additional staff to cap class size; and additional compensation for staff. A conservative estimate is that the return to the 2010 staffing levels HTA requests would result in an additional eight classroom teachers (\$660,000) and 12 paraprofessionals (\$382,500), at a combined cost of more than \$1,042,000 annually. In addition, HTA's proposed class size reduction in kindergarten through fifth grade would lead to an estimated cost increase of \$825,000. Combined, HTA's

¹⁰ See, for example, HTA proposed modification #1 on p. 23 ("The Commissioner shall submit the amended plan to the local stakeholder group for proposed modifications consistent with G.L. c. 69, § 1J(p)."); proposed modification #5 on p. 35 ("The schedules will go back to the local stakeholders' group for recommendations for modifications consistent with G.L. c. 69, § 1J(p). In addition, the schedules will be provided to the Association and the Commissioner will provide the Association with the opportunity to negotiate regarding impacts on the collective bargaining agreement consistent with G.L. c. 69, § 1J(o)."); proposed modification #9 on p. 33 ("The Commissioner shall submit new Section 5.6, together with any justification for not adopting current FSCS measures, to the local stakeholders group for proposed modifications consistent with G.L. c. 69, § 1J(p)."); and proposed modification #10 on p. 46 ("The school committee, the Commissioner, and the Association will jointly study all forms of salary schedule constructs to determine which will be most effective in attracting and retaining high-quality teachers at the Morgan School.")

staffing proposals would lead to almost two million dollars in costs beyond those identified in the Morgan plan, which would be unsustainable in a district with resource limitations. In contrast, in creating the Turnaround Plan, I was deliberate about making the most effective use of existing resources, and providing additional resources where “start-up” costs were necessary. I do not believe it is appropriate to put in place a turnaround plan requiring strategies or staff that the district would not be able to afford in the future.

The HTA requested modifications based on a premise that simply adding more resources is better. However, it has been our experience in working with Level 4 schools that resources alone do not ensure success. What is successful is when the Turnaround Plan focuses intensively on a number of effective strategies. That is the approach we have adopted in the Morgan Turnaround Plan.

HTA’s request to return to Morgan’s 2010 staffing levels is unnecessary.

(HTA Requested Modification #2 and pp. 26-27 of HTA appeal)

The HTA has proposed a modification to restore the instructional positions eliminated since 2010 to the school. I do not believe these positions are necessary for effective implementation of the turnaround plan.

In school year 2013-2014, the Morgan has approximately 10 percent fewer students enrolled than it did in school year 2009-2010 (400 versus 442). In addition, the Morgan currently has more than 35 percent fewer students with disabilities than were enrolled in school year 2009-2010;¹¹ as services to students with disabilities often require additional adult support, it follows that this significant decrease in enrollment of students with disabilities would mean that fewer staff are required. During the time period indicated by HTA, Morgan reduced its staff by a net total of 15 members (20 removed and five added). Twelve of the positions removed were paraprofessionals; all of these positions were dedicated to providing Special Education support.

The HTA asserts that the reduction in staffing since 2010 is a cause of teacher turnover at the Morgan School. The Department reviewed teacher turnover rates in Holyoke’s K-8 schools during the time period identified by HTA. It appears that there was significant staff turnover in many Holyoke schools during school year 2010-2011. Staff turnover at Peck (30 percent), Donahue (31 percent), Kelly (36 percent), McMahon (31 percent), and Morgan (35 percent) was

¹¹ According to data provided to ESE by the Holyoke Public Schools.

all approximately double both the district and state turnover rates in that year. Clearly, there were larger issues leading to teacher turnover rates throughout the district.

In addition, the HTA argues that the pre-2010 staffing structure should be reinstated because it was producing positive results for students. This argument is not supported by the school's performance data. Although a few indicators improved marginally between 2009 and 2010, the school had a multi-year history of abysmal results, which is why it was designated as Level 4 in the first place. For example, at the time of its Level 4 designation, the school had less than 10 percent of students scoring Proficient or Advanced on the Mathematics MCAS for five consecutive years. Conversely, the HTA suggests that it was impossible to achieve better results under the conditions and staffing structure of the Level 4 Turnaround Plan. This, too, is an unsound argument because the school experienced its *greatest* gains during the first year of implementing that plan (SY2010-11). Unfortunately, even these gains – eight percentage points in ELA and five percentage points in Mathematics – were not enough to put the school on an improvement trajectory, and after the first year, performance was inconsistent.

The Department has reviewed the staffing patterns in Level 4 schools that successfully exited Level 4 status and achieved significant improvement in student performance. The Department has also worked directly with Project GRAD to determine the staffing levels needed at Morgan for school year 2014-2015.¹² Given the enrollment levels, composition of Morgan's student populations, and strategies identified in the Turnaround Plan, returning to 2010 staffing levels is unnecessary.

Please see the response to HTA Requested Modification #4 below for more information about the Director of Business Operations and the STEM principal.

The HTA's request to limit classroom size is not the best use of resources.

(HTA Requested Modification #3 and pp. 27-28 of HTA appeal)

The HTA has proposed a new strategy for the Turnaround Plan to ensure very small class sizes for students at Morgan Full Service Community School.¹³ I do not support this modification. The staffing level, along with other strategies set forth in the Plan, is designed to

¹² Current staffing figures for Morgan include 22 classroom teachers, 6 ESL teachers, 4 Special Education teachers, 4 specialist teachers, 2 coaches, and a range of other staff; I believe this staffing model will allow for effective implementation of the Turnaround Plan.

¹³ HTA's class size reduction proposal would lead to the addition of 10 classroom teachers in a school with only 39 teachers and 400 students. This would require estimated additional funding of \$825,000.

bring about rapid advances in student academic performance.

The research on reduced class size provides a mixed assessment of impact and is definitive that in light of the cost of class size reduction, there are more cost-effective means of improving student achievement. A full review of the literature on class size reduction demonstrates a number of rigorous studies (most notably in Connecticut¹⁴ and Florida¹⁵) that have found class size reduction had no impact on positive student outcomes. Such studies, and others like them that have shown insignificant positive and/or negative outcomes, demonstrate the mixed nature of research on class size reduction.

Moreover, even if the research literature were conclusive that class size reduction always led to significant positive student outcomes, the question would then be: *Given that the goal is to improve student outcomes, and that there are many proven methods to improve student outcomes, is class size reduction the most cost-effective means by which we can accomplish that goal?* The research base on that question is limited, but what does exist is clear: among a broad range of possible reforms, class-size reduction is the least cost-effective way¹⁶ to improve student achievement.

As a practical matter, there is only one available space in the building that could be converted into an additional classroom. The Achievement Gap Act protects the rights of all students currently enrolled at the school to stay at the school. G.L. c. 69, § 1J(a). The HTA's proposed modification would require 10 additional classrooms, or significantly fewer students. Limiting enrollment to reduce class sizes is neither allowed under the law nor in the best interest of Morgan students. Prioritizing cost-effective and educationally-sound strategies as indicated above, Project GRAD is planning to use the one additional space for a pre-kindergarten classroom if sufficient funding is obtained for the program.

Therefore, I decided that the Turnaround Plan for Morgan would focus on a broad range of programming, such as ensuring highly effective instruction, project-based STEM instruction,¹⁷ increases in instructional time, and differentiated interventions for students, that are designed to be both affordable and effective for improving student outcomes.

14 Hoxby, Caroline M. "The Effects of Class Size on Student Achievement: New Evidence from Population Variation," *Quarterly Journal of Economics*, 115(4): 1239–1285 (2000).

15 Chingos, Matthew M. "The False Promise of Class-Size Reduction," Center for American Progress (2011).

16 Harris, Douglas N. "Toward Policy-Relevant Benchmarks for Interpreting Effect Sizes: Combining Effects With Costs," *Educational Evaluation and Policy Analysis* 31(1): 3–29 (2009).

17 There is only one available space in the school building that could be converted into an additional classroom. Prioritizing cost-effective strategies as indicated above, Project GRAD is planning to use that space for a pre-K classroom if sufficient funding is obtained for the program.

The Director of Business Operations and the STEM principal are strategic roles for the effective implementation of the Morgan Turnaround Plan

(HTA Requested Modification #4 and pp. 26-27 of HTA appeal)

The HTA has proposed removing two positions created through the Turnaround Plan: the Director of Business Operations and the Principal of the STEM Academy. I do not support this modification. These roles have been developed strategically to ensure effective implementation of Morgan's Turnaround Plan.

The Director of Business Operations will focus on ensuring that the school's operating procedures are implemented effectively and efficiently. He or she will take care of the operational components of the school, allowing the instructional leaders to focus entirely on instruction. If a bus is not running on time or there is a leak in the building, the Director of Business Operations will be able to solve these problems. The other school leaders will therefore be able to dedicate their time entirely to supporting teachers and focusing on the instruction at Morgan. In addition, as Morgan is in state receivership, there are supports generally provided by the district related to finance, human resources, and other operational functions that will be provided instead by the Receiver. Given that reality, the extensive redesign of Morgan's curriculum, and the rapid student growth the staff must facilitate, it is critical that the instructional leaders can devote their full attention to academic matters. High performing district and charter schools, including schools that have exited Level 4 status such as Boston's Orchard Gardens, find that dedicating a staff person to address the school's many operational issues allows the rest of the faculty to maintain a consistent focus on students' learning.

Jim Harris will be serving as the Director of Business Operations at Morgan Full Service Community School, effective July 1. Mr. Harris has served in multiple school and district operational roles, including as the Operations Leader at the Citizens Leadership Academy in Cleveland, Ohio, as the Chief Operations Officer of Dayton Public Schools, and as the Chief Operating Officer of the Evansville Vanderburgh School Corporation, where he managed a budget in excess of \$40,000,000 and oversaw the operations of a 23,455 student, 42 building school organization. Mr. Harris's depth and breadth of operational expertise will be an asset to the school leadership team as it implements Morgan's Turnaround Plan.

A new STEM focus for all of Morgan's students, with a particular emphasis in the STEM

Academy for Grades 6-8, is a centerpiece of the Morgan Final Level 5 Turnaround Plan. The STEM Academy will embody principles of project-based learning and give students rich opportunities ranging from mentorships with local STEM businesses to projects using Dean Technical High School's state-of-the-art science labs. Because the STEM Academy will be a new addition to the school and a Priority Area in Morgan's Turnaround Plan, dedicated leadership is necessary for its effective development and implementation. The STEM Academy Director¹⁸ will help teachers infuse STEM throughout all subjects, support teachers in employing project-based learning, and oversee the partnerships with outside STEM-related resources. In addition, because this leadership position will be responsible for all parts of the academic program for Morgan's 6th through 8th grade students, the director will also ensure that literacy goals are achieved and ELL and Special Education populations are provided with the attention and resources necessary for their success. The Director of the STEM Academy will also serve as another source of expertise for the Principal in designing and implementing the STEM program of study in the elementary grades. I believe that having an additional resource devoted to Morgan's STEM Academy will result in strong implementation of Priority Area 3 in the Final Turnaround Plan.

Katie DeMars is joining Morgan's administrative team in the position of Director of STEM Academy, effective July 1. She is currently a science teacher and the Science Department Chair at M. Marcus Kiley Middle School in Springfield, Massachusetts, where she has played an integral role in building a robust STEM culture. In this role, she teaches 6th and 8th grade science, mentors teachers, helps plan and present professional development, coaches teachers, and creates rich STEM-focused extracurricular activities for students. Previously, Ms. DeMars was a middle school science teacher at Holy Name School, also in Springfield, MA. Ms. DeMars holds a Principal/Assistant Principal Initial Grade 5-8 license as well as Grades 1-8 General Science licenses, and also has her SEI endorsement. Her instructional and content-area expertise will provide a solid foundation for the new STEM focus throughout Morgan.

The Turnaround Plan includes appropriate information about students' and teacher's schedules.
(HTA Requested Modification #5 and pp. 33-35 of HTA appeal)

18 Title revised from "STEM Academy Principal" or "6-8 grade instructional leader (Principal)" in the Morgan Turnaround Plan. The duties for this position are the same: to provide instructional leadership for Grades 6-8 at Morgan, which comprise Morgan's STEM Academy.

The HTA suggests an additional strategy regarding the development of student and teacher schedules by June 15, 2014. This new strategy is not necessary as a general schedule has already been made available. Teachers will work from 7:30 to 4:00 and students will attend from 8:00 – 3:30. During the negotiations, the HTA was provided with a sample schedule for both teachers and students at the request of the HTA. The sample schedule was provided with the understanding that once the budget and the staffing plans for the school are finalized, the schedules would be developed and disseminated. A school year calendar, including school hours has been made available to anyone applying to work in the school. Families, students, and staff will receive a daily schedule before the start of the school year.

In addition, the HTA requests that modifications to this section be submitted to the local stakeholder group for further review. As explained in the memo prepared by members of my legal staff, the process proposed by the HTA for resubmitting elements of the plan to the LSG is inconsistent with the requirements of the Achievement Gap Act.

Creating a center of excellence for Science, Technology, Engineering, and Mathematics (STEM) is an essential strategy for the rapid academic achievement of Morgan’s students.

(HTA Requested Modification #6 and pp. 23-26 of HTA appeal)

The HTA has requested that Priority Area 3 of the Morgan Turnaround Plan, which is dedicated to STEM education, be removed. This modification appears to be based on confusion about both the Turnaround Plan’s strategies, and how STEM content and strategies can work in concert with instruction in other academic content areas. For the reasons described below, I do not support the proposed modifications.

The National Science Foundation created the term “STEM” as a way to encompass a new "meta-discipline" that combined science, technology, engineering, and mathematics subject areas. This new discipline was meant to transform traditional classrooms from teacher-centered instruction into inquiry-based, problem solving, discovery zones where children engage with content to find solutions to problems.¹⁹ The STEM concept is focused on problem-solving in a holistic way, through a student-centered lens. “It is the applied convergence of these disciplines

¹⁹ Fioriello, Patricia, Understanding the Basics of STEM Education, <http://drpfconsults.com/understanding-the-basics-of-stem-education/>

used to solve a problem.”²⁰

A central component of Morgan’s Level 5 Turnaround Plan is a STEM Academy in the middle school grades (Strategies 3.2, 3.3, and 3.4, Turnaround Plan pp. 19-21), accompanied by a greater emphasis on STEM content in the elementary grades (Strategies 3.1, 3.3, and 3.4, Turnaround Plan pp. 19-21). Both of these efforts are important for Morgan students’ learning, both now and in the future. In addition, this Priority Area is directly aligned with Morgan’s Local Stakeholder Group’s January 2014 recommendation to develop a STEM Academy for Morgan’s upper grades.²¹ I believe that the skills Morgan’s students will learn through this increased focused on STEM subject material will serve them well now, and prepare them for success in high school and beyond.

Early exposure to STEM builds student interest and the capacity to pursue future study in STEM fields. As I indicated in the Morgan Turnaround Plan, job opportunities in STEM will increase significantly over the coming decades; Morgan’s students should be fully prepared to participate in these careers. The Governor’s STEM Advisory Council outlines the importance of STEM for all students in *STEM Plan 2.0-A foundation for the Future: Massachusetts Plan for Excellence in STEM Education*.²² The STEM Advisory Council also highlights the achievement gap in STEM content areas, with Honorary Council Chair Congressman Joe Kennedy specifically mentioning low income and minority communities “...where the opportunities provided by STEM education are often most needed but hardest to come by.”²³ This description could easily apply to Holyoke.

When STEM is taught in a student-centered way, students are engaged and the skills they develop in one area, such as mathematics, are reinforced in other areas, such as science and engineering. A wide range of learners, including English language learners and students with disabilities, are able to engage with complex ideas through interactive content. In addition, students with disabilities have much lower rates of graduating college and competitive employment. Having strong STEM skills will help them become independent adults and contributing members of society. Early exposure to STEM at both middle and elementary school

20 Beth Howard-Brown and Danny Martinez. *Engaging Diverse Learners Through the Provision of STEM Education Opportunities: Southeast Comprehensive Center Briefing Paper, May 2012.*

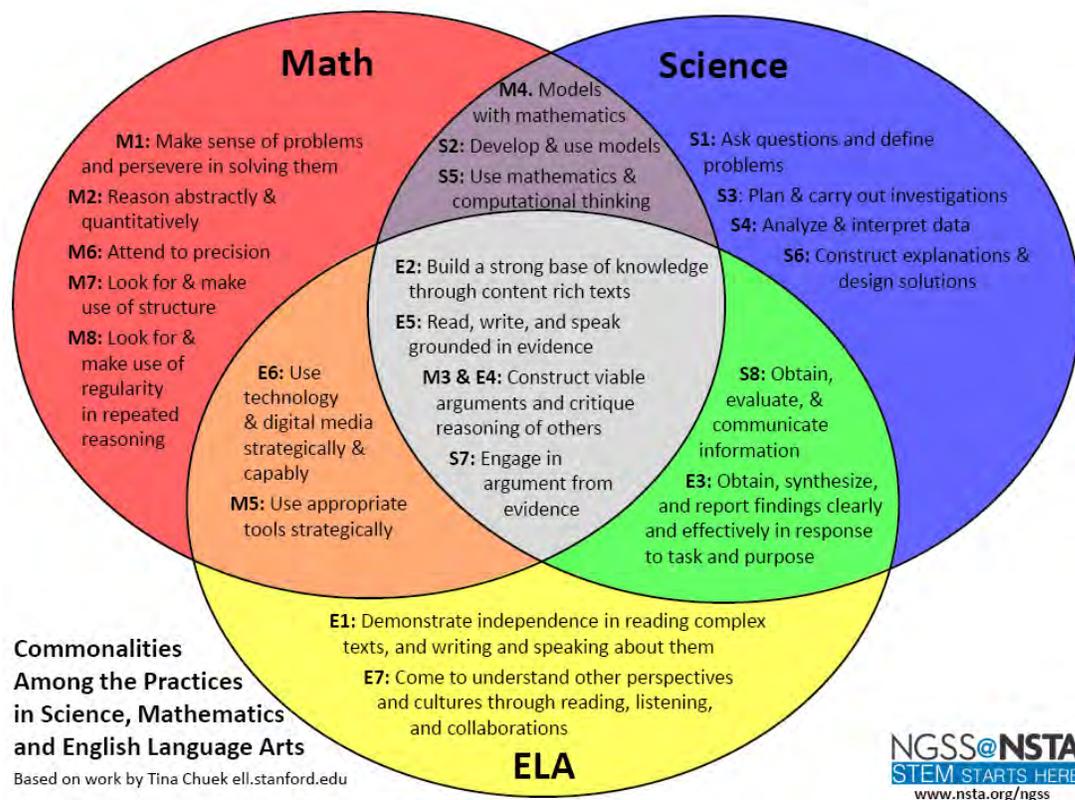
21 Specifically, the Local Stakeholder Group recommends moving Morgan’s 7th and 8th grades to Dean Technical High School to create a STEM-focused district-wide middle school magnet opportunity. Project GRAD will continue to explore the development of this option with the district in future years. See Morgan Final Turnaround Plan, Strategy 3.5, page 21.

22 <http://www.mass.edu/stem/documents/2013-11MassachusettsSTEMPlan2.0.pdf>

23 Ibid, page 2.

is important not only to develop student interest, but to develop the skills and habits of mind that will promote student success in high school and beyond.

The Massachusetts Curriculum Frameworks for English Language Arts, Mathematics, and Science and Technology/Engineering require students not only to engage in content but also to employ practices. Priority Area 3 in the Morgan Turnaround Plan relies on a project-based learning approach, requiring students to integrate learning from multiple disciplines. They will be asking questions and defining problems, using computational thinking, supporting their ideas with evidence, reading, writing, thinking, and communicating their ideas. These practices support learning in all of the disciplines, not just STEM.²⁴ The intersection and interaction of these practices is shown in a diagram produced by researchers at Stanford University (“Commonalities Among the Practices in Science, Mathematics, and English Language Arts”); see Figure 1 below).



24 Douglas, Rowena, ed. Linking Science and Literacy in the K-8 classroom. NSTA Press, 2006.

The Turnaround Plan appropriately addresses ELA and Math; it also appropriately addresses educational strategies for English language learners and students with disabilities.

(HTA Requested Modification #7 (items 1-4) and pp. 23-26 of HTA appeal)

The HTA has requested that additional details be provided regarding strategies and resources for Strategies 4.1, 4.2, 4.5, and 4.6 in the Morgan Final Turnaround Plan. Embedded in this modification are several different requests and concerns. For the reasons described below, the HTA's requested modifications to multiple strategies in Priority Area Four are either unnecessary or are unduly prescriptive.

First, HTA proposes that I provide more specificity around the specific strategies and resources that will be utilized for Morgan's academic program, in both ELA (4.1) and Math (4.2). The Turnaround Plan provides information in multiple Priority Areas about ELA and Math instruction at Morgan, including the mapping of resources to standards (2.1), cycles of formative assessment and feedback (2.3), the multiple STEM strategies in Priority Area 3, and the aligned resources for ELA (4.1) and Math (4.2). All of these strategies will be tailored to the needs and current proficiency levels of Morgan's student population; they will likely change over time, again being adapted to the changing needs and skills of Morgan's students. To identify now every curricular material, educational technique, or other specific strategy for ELA and Math for the next three years would negate Morgan's educators' professional judgment and expertise, and would create a rigid structure that may not meet the needs of Morgan's students as they evolve over time.

In addition, the HTA expresses concern that Project GRAD's initial review of existing curricular materials in the school resulted in our being unclear about what the materials are and the extent of their alignment with state standards (Turnaround Plan, p. 24). My understanding from both GRAD and ESE staff is that there are extensive groupings of curricular materials located haphazardly throughout the school, many boxed up and unused. As indicated in the Priority Area 4 "Challenges" section it is unclear "...whether teachers are aware of all that is available and how to match [materials] to student and content needs" (Turnaround Plan, p. 24). Morgan's teachers have also identified instructional materials as being problematic. As recently as November 2013, when responding to a survey prepared by the HTA, over half of respondents

indicated that they didn't have sufficient instructional materials for all of their students; 45 percent did not have access to library, media, or technology resources; and over one-third indicated they did not have appropriate materials for their students.²⁵ The HTA incorrectly attributes the positivity of the Monitoring Site Visit's findings about Morgan's math curriculum documents to other subject areas and all instructional materials. In fact, the MSV findings indicate "an absence of comprehensive or user-friendly guidance in other subject areas."²⁶

Second, HTA proposes that I provide detail about specific strategies that will be utilized to educate Morgan's ELL students (4.5). A key component of this work is the professional development that will be provided to the Morgan faculty to ensure they are prepared to teach Morgan's many ELLs. Morgan school staff will utilize strategies proven through research to be highly effective for ELLs taught in the SEI Endorsement course which all school teachers and leaders must successfully complete. (See Exhibit 2 for a list of strategies from the 2013-14 full course.) The school will use SEI Endorsement training to establish a language rich environment that promotes literacy across the content areas for all students and provides appropriate scaffolds and supports for ELLs. This summer, teacher teams will work with ELL specialists to identify and develop grade level appropriate, differentiated assignments, and to identify support materials for standards based planning. These methods will be implemented as soon as school begins.²⁷ Whole school English Language Development embraces these strategies, integrates them with the whole plan, and will follow guidance in a document from ESE's Office of English Language Acquisition and Academic Achievement (OELAAA), called *Transitional Guidance on Identification, Assessment, Placement, and Reclassification of English Language Learners*²⁸ to address the achievement gap and ensure that ELLs receive the high quality education they need for success.

Third, HTA proposes that I provide detail about specific strategies that will be utilized to educate Morgan's students with disabilities (4.6). The proposed modification is unnecessary as the specific strategies and resources necessary to serve students with IEPs are already specifically identified on those individual students' IEPs. Strategy 4.6 already states the necessity of providing the services of each student's IEP. The IEP is the plan to address difficulties presented by the student's disability. Otherwise, involving the student in high quality general

25 Item #6 in HTA survey of Morgan teachers, November 2013. Included as Attachment D in HTA appeal package.

26 MSV Report, page 5, Attachment E in HTA appeal package

27 The expertise of Morgan's new Dean of Instruction, who is a certified SEI instructor, will play a pivotal role in this work.

28 <http://www.doe.mass.edu/ell/TransitionalGuidance.pdf>

education programs is the vehicle to address non-disability related learning.

Finally, the HTA proposes that I identify a comprehensive alternative English language learning program for LEP students (in Strategy 4.6).²⁹ The English Language Development strategies woven throughout the Morgan Turnaround Plan are sufficient as written to provide a comprehensive alternative English language learning program for ELL students.

Effective whole school ELL programs are essential to English language learner success. As stated in *English Language Learners at School: A Guide for Administrators, Second Edition*, “The goal is for schools to develop educationally sound instructional programs that everyone (parents, teachers, district personnel, community members) understands and supports, and to implement those programs effectively so they can deliver results for ELL/bilingual learners. By instructional programs for ELLs, we mean all of the instruction that an ELL student receives in a day, not just time spent with an ESL or bilingual specialist. Program coherence is key.”³⁰

The Morgan Turnaround Plan transforms the whole school into an alternative integrated coherent ELL program through strategies woven throughout the plan. Effective ELL program models share five key characteristics, identified below. Strategies in Morgan’s Final Turnaround Plan address each of these five program elements.

a. Effective programs ensure that ELLs attain proficiency in English and are given equal access to the core curriculum.

Strategy 4.5 identifies the professional development that will allow teachers to work effectively with ELL students. In addition, in plan Strategy 2.1, ELLs are given access to the curriculum through teachers’ work to unpack the Massachusetts Curriculum Frameworks, and to align curricular resources (cross-curricular whenever possible), instructional strategies (focused on SEI strategies), and assessments to those standards.

b. Effective programs make use of multiple ongoing authentic assessments.

Strategies 2.3, 2.4, and 2.5 all address the development and use of comprehensive data management systems that will allow leaders and teachers to make individualized adjustments based on students’ needs and performance.

²⁹ Strategy 4.6 specifically addresses supports for students with disabilities; it may be that HTA intended this modification to be incorporated into Strategy 4.5 (regarding English language learners).

³⁰ Hamayan, Else & Freeman Field, R. *English Language Learners at School: A Guide for Administrators, Second Edition*. Caslon: Philadelphia. 2012.

c. Effective programs have teachers who are fully credentialed and certified to work with ELLs.

Priority Area 1 and Strategy 4.1 both address teachers' knowledge and skill in working with ELLs. Recruitment and hiring is placing a particular priority on candidates who are bilingual and have demonstrated impact with students or have demonstrated excellence in serving ELLs. The whole school SEI Endorsement training and follow-through is the linchpin to the success of Morgan's ELLs.

d. Effective programs provide ongoing professional development opportunities for teachers and administrators.

Strategies 1.2, 1.3, and 1.4 all address the importance of providing training and supports that teachers and administrators need to serve ELLs effectively. Professional Learning Communities (PLCs) will enable teachers and leaders to reflect on progress and challenges implementing SEI strategies and standards-based lessons. They will also serve to identify students in need of intervention to master required concepts and content. In order to ensure that SEI strategies are embedded in all content areas and planning, coaches will play an integral part in modeling, supporting and monitoring the effective implementation of these strategies across grade levels and content-areas.

e. Effective programs promote active parental involvement and value students' native languages and cultures.

Strategies 5.1 and 5.2 focus on this key characteristic of effective ELL programs. The School Site Council will help launch the English Language Learner (ELL) Parent Advisory Committee (PAC) to cultivate parent leadership and advocacy around serving ELLs effectively. The family engagement focus embodied in the Welcome Center, Walk for Success, and the Family Engagement Coordinator position are additional strategies that support this program element.

For the multiple reasons described above, the four sets of modifications proposed by HTA to Priority Area 4 are unnecessary.

The Morgan School will have a Pre-Kindergarten class in the Fall of 2014

(HTA Requested Modification #8 and pp. 28-30 of HTA appeal)

The Holyoke Teachers Association proposed a modification to the Morgan turnaround

plan that would commit ESE to creating a new pre-Kindergarten program at the school in Fall 2014. I recommend that the Board adopt a component of the proposed modification³¹; the Morgan School will include a Pre-Kindergarten class in Fall 2014. As described in the Turnaround Plan and in alignment with the Local Stakeholder Group's recommendations to me for the Turnaround Plan, Project GRAD and I are fully committed to this strategy. (Turnaround Plan Strategy 4.4, page 27). In fact, Project GRAD is on its way to developing and launching a Pre-Kindergarten program in the building but cannot commit to unlimited capacity for Fall 2014. A space has been identified in the Morgan building, recruitment and vetting of potential teacher applicants is being conducted, and funding options are being reviewed to deliver on this aspect of the plan.

Further, Project GRAD is in the process of assessing the preschool needs and resources already available for Morgan families to better determine the demand for the program. Less than half of current Morgan kindergarteners (43% or 24 of 56) attended a publicly-funded preschool program, either through the Holyoke Public Schools or in a community-based program. Nine of the 24 students attended Metcalf Preschool, which is a Holyoke Public School that enrolls students from throughout the district. The remaining 32 students either attended a privately-funded program or did not attend a preschool program. The Turnaround Plan appropriately focuses on determining Morgan families' preschool education needs and identifying space for a preschool classroom(s) in response to the identified need.

Holyoke provides many opportunities and choices for daycare and preschool. Other than the Metcalf School, the local pre-K programs most widely used by Morgan families are Valley Opportunity Council, Square One and VOC Early Education and Care. These programs offer extended operating times (starting as early as 6:30 AM and ending as late as 5:30 PM) to accommodate working schedules for parents, and serve children ages three months to five years, allowing siblings to be together during the parent's work day.³² Many offer additional access and supports to Holyoke families including employment assistance; parenting and childcare classes and supports; home visits; and assessments and referrals to community resources. Head

³¹ I recommend that the Board adopt the following portion of the HTA requested modification for Strategy 4.4: Add the following language to Strategy 4.4 of the Final Plan: "The Commissioner and Receiver shall take any and all steps to introduce a Pre-Kindergarten program to the Morgan School by Fall 2014 ~~including finding appropriate space and sufficient funding so that all Morgan students may enroll.~~"

³² The Metcalf School offers a half-day pre-K program, with sessions starting in the morning and at mid-day. The morning session is fully subscribed; the mid-day session still has 10 seats available (out of 122 total seats) late in the school year. It is anticipated that Metcalf will have ample seats for the SY14-15 school year in both time slots because of a high number of students moving into Kindergarten next year.

Start is another option for families, offering additional services such as Early Head Start; programs for eligible migrant/seasonal children up to age 5 and their families; parenting programs; health and mental health services; nutritional programs and services; and healthy relationships programs. Given the competing programs with extended hours and additional services for children and families, we do not yet know what the demand will be from families in Morgan's attendance zone but Morgan families will have first preference for seats in the Morgan Pre-Kindergarten program. Determining the demand by families for a pre-K program at Morgan, designing the program to meet family needs, and executing a strategy for attracting students to the program is critical to successful enrollment and attendance strategies.

ESE has been working with the Department of Early Education and Care and the Legislature to secure resources to support pre-K in Level 5 schools and districts. The State Senate Ways and Means Committee has recently released a proposed budget for Fiscal Year 2015 which includes \$1,000,000 for a grant program to fund pre-K classrooms in the Commonwealth. The legislation would allow Level 5 schools and districts to receive preference in a grant competition for these funds. These critical funds would help provide the Commonwealth's neediest students with key building blocks for school readiness.

The Turnaround Plan includes wraparound services, and is aligned with Morgan's existing Full Service Community School model. To further demonstrate this shared commitment, I propose to adopt a portion of HTA Requested Modification #9³³.

(HTA Requested Modification #9 and pp. 30-33 of HTA appeal)

The HTA has requested that an additional strategy be added to Priority Area 5 of the Turnaround Plan that specifically addresses the provision of wraparound services. Both Project GRAD and I share in HTA's belief that this area of work is of critical importance, which is why I have included several wraparound-related strategies in the Turnaround Plan. Strategy 5.3, in particular, articulates the partnerships that will be deepened and/or cultivated to meet the

³³ I recommend that the Board adopt the following portion of the HTA's proposed modification, as follows:

Requested Modification: Additional Strategy 5.6: The Board should require the addition of Strategy 5.6 which reads to follows: "The Commissioner will identify specific programs of delivery of wraparound services.", ~~and the cost of such programs." If such programs do not include those currently implemented in FSCS, the Commissioner will give written justification to the Board, the District, the local stakeholder group and the Association as to why the FSCS programs were not adopted. The Commissioner shall submit new Section 5.6, together with any justification for not adopting current FSCS measures, to the local stakeholders group for proposed modifications consistent with G.L. c. 69, § 1J(p). The Commissioner shall take into consideration and incorporate the local stakeholder's modifications if they would further promote the rapid academic achievement of students.~~

wraparound needs of students and families. Furthermore, while the majority of wraparound-related approaches are discussed in Priority Area 5, other parts of the Plan address this important work as well. For example, Strategy 2.7 describes the tiered system of supports that will be employed to identify and address students' academic and non-academic needs. In addition, Strategies 3.4 and 4.7 both pertain to the provision of enrichment activities and supports through coordinated in- and out-of-school partnerships. These examples illustrate that meeting the needs of the whole child is not just a siloed strategy, but rather an integrated and embedded priority of the Turnaround Plan as a whole.

I would also note my commitment to maintaining Morgan's status as a Full Service Community School (FSCS). Central to the FSCS model are the two positions that coordinate community partnerships and engage with families. Not only are these FSCS-related positions being continued, the individuals currently acting in those roles will continue, which will allow for continuity of programming. Project GRAD will work with these two staff members to evaluate current family and community engagement approaches, building upon those that are most effective and establishing new partnerships where there continue to be gaps. Similarly, leadership of the school will assess and refine the current behavior management and student assessment ("WRAP") systems to ensure that what has worked well for Morgan students will continue and any areas for development are further strengthened.

I believe that the currently articulated strategies are fully aligned with HTA's request. Therefore, to be even more explicit about this shared commitment, I am pleased to recommend that the Board adopt an additional Strategy 5.6 that reads as follows: "The Commissioner will identify specific programs of delivery of wraparound services." I would add that Project GRAD, with its long history of building wraparound support systems in schools across the country, is particularly well poised to oversee the implementation of these strategies. Through its Wraparound Services model (the predecessor to GRAD Academies), Project GRAD has worked with over 200 public schools (K-12) connecting them with wraparound services, helping to develop their engagement models, and ultimately serving over 135,000 students. This model serves as the "GRAD DNA," and will be an important component of what the organization brings in its role as Receiver for Morgan.

Please note, however, that I am not supporting the adoption of two supplemental components of the HTA's request. First, I do not believe that the inclusion of wraparound service

program costs is appropriate for the Plan. While the school will play a significant role in identifying student and family needs and better coordinating the appropriate services and referrals, it will not serve as the primary provider of these wraparound services. Third party providers (including other agencies and nonprofits) will largely play this role, thereby assuming most of the associated costs. As described in the Turnaround Plan, coordination of partners and service providers will be overseen by the Community Partner Coordinator. Similarly, activities related to engaging and supporting families will be overseen by the Family Engagement Coordinator. Both of these positions are fully funded.

Second, the HTA requests that modifications to this section be submitted to the local stakeholder group for further review. As explained in the memo prepared by members of my legal staff, the process proposed by the HTA for resubmitting elements of the plan to the LSG is inconsistent with the requirements of the Achievement Gap Act.

Other issues raised by the HTA's appeal

In its appeal, the HTA also raised issues relating to the performance of the Local Stakeholder Group, as well as the Financial Plan and the dispute resolution process that were included in the Turnaround Plan. For the reasons provided below, I believe these concerns are unfounded.

The statutory requirements relating to the Morgan Local Stakeholder Group were fully satisfied.

(Related to HTA Requested Modifications 1, 5, and 9)

The HTA asserts that the LSG did not have the opportunity to fully participate in the development of Morgan's Turnaround Plan. This claim is simply incorrect.

Following Morgan's designation as a Level 5 school, I convened a local stakeholder group. The LSG met four times, and provided recommendations for the Turnaround Plan within the statutorily required timeframe. The recommendations were included as Appendix D to the Preliminary Turnaround Plan. I considered the recommendations, and as noted in the Preliminary Turnaround Plan, incorporated some of the recommendations into the plan. After I issued the Preliminary Turnaround Plan, consistent with the statute, I invited the LSG to propose modifications to the plan. The LSG met three times and proposed modifications to the Turnaround Plan in a timely manner. I appreciated the thoughtful input of the LSG, and

considered the modifications it proposed. I sent a written response to the LSG indicating which modifications I adopted and where they were incorporated into the Final Turnaround Plan.³⁴ In each instance where I declined to adopt a modification, I provided my reasoning. We were committed to transparency, both by providing the reasoning behind decisions, and by posting the documents received from the LSG and my response on the Department's website.

At each step, the statutory process (including all timelines) was fully met. The LSG participated in the creation of the Turnaround Plan in the manner outlined in the law. I considered its recommendations and proposed modifications, and included some of its proposals in the Turnaround Plan. Both Project GRAD and I are committed to engaging with Morgan's stakeholders throughout the turnaround process. Morgan's many stakeholders are essential to the work ahead.

The Turnaround Plan includes a Financial Plan that meets all statutory requirements.

(HTA Requested Modification #1 and pp. 16-23 of HTA appeal)

ESE has developed a financial plan to support the operation of Morgan School for the upcoming 2014-2015 school year. The HTA argues in its appeal that the financial plan included in the turnaround plan is legally insufficient. This claim is without basis in the Achievement Gap Act; both the preliminary and final versions of the plan met the statutory requirement. As is explained in the accompanying legal memorandum from my staff, the law requires is "a financial plan for the school, including any additional funds to be provided by the district, commonwealth, federal government or other sources." G.L. c. 69, § 1J(n).

In addition to satisfying the letter of the law, the Turnaround Plans (both preliminary and final), including the financial plan, provided sufficient information for the Local Stakeholder Group (LSG), the superintendent, and the school committee to propose modifications to the preliminary Plan; for the local union, superintendent and school committee to appeal components of the final Plan; and for the Board to exercise its statutory authority to consider any proposed modifications to the Plan.

The preliminary Turnaround Plan provided the level of detail necessary for the LSG to propose over a dozen modifications to the Plan, including modifications that would have a financial cost: some examples are additional language regarding the provision of services to

³⁴ My response to the LSG is included as Exhibit 1.

students with disabilities, additional language regarding a pre-kindergarten program and a change to the compensation system. In fact, in its proposed modifications, the LSG expressed no concerns about – nor did it even mention -- the financial plan included in the preliminary turnaround plan.³⁵ (The Superintendent and School Committee also did not exercise their statutory opportunity to address the financial plan; neither party proposed any modifications to the preliminary Plan.) As directed under the law (GL c. 69, § 1J(p)), I considered the recommendations and adopted those that I determined would further promote the rapid academic achievement of students at Morgan. My final Plan also provided sufficient information for the HTA to propose 14 modifications, including modifications that would have a financial cost, such as adding staff (modifications 2 and 3) and changing the compensation system (modification 10).³⁶ After review of the final Turnaround Plan, the Holyoke School Committee proposed a modification which would establish a school-based special education parent advisory council; it did not address any issues related to the financial components of the final Turnaround Plan.

The Priority Areas and Strategies of the Turnaround Plan explain how I, working with Project GRAD, intend to implement a program at Morgan designed to maximize the rapid academic achievement of students at the school. The Plan details how education will be provided at the school, explaining, among other topics, how staffing will be deployed (e.g., literacy and math coaches - strategy 1.2 ; STEM Academy Principal – strategy 3.3; family engagement coordinator strategy 5.2); how additional staff time will be spent (e.g., planning and collaboration - strategy 2.6; sheltered English Instruction and Standards-based, data-informed planning and instruction strategy 1.3; STEM professional development for teachers strategy 3.3); and what additional educational resources will be used at the school (e.g. data analysis and management tool- strategy 2.5; extra-curricular opportunities in the STEM fields- strategies 3.2 and 3.4; curriculum resources aligned to the Massachusetts Curriculum Frameworks strategies 4.1, 4.2, 4.3; in-school tutors – strategy 4.7; a pre-kindergarten program – strategy 4.4) There is no legal requirement of a line-item budget and no basis to argue that any group (LSG, school committee, union, or even the Board) has a statutory charge of scrutinizing a line-item budget and proposing specific shifts in budget allocations.

35 Morgan Level 5 Local Stakeholder Group, Proposed Modifications to Draft Turnaround Plan, submitted to DESE April 6, 2014. <http://www.doe.mass.edu/apa/sss/turnaround/level5/schools/Morgan-StakeholderMods.pdf>

36 The HTA also proposed modifications that would have reduced staff and expenses (modifications 4 and 6 – eliminating the STEM program). Clearly, the HTA faced no impediment to proposing a major change in the plan priorities – it proposed eliminating the STEM program, one of the centerpieces of the Commissioner’s proposed plan for the school.

The Turnaround Plan's compensation system promotes teacher performance.

(HTA Requested Modification #10 and pp. 35-46 of HTA appeal)

The HTA requests that (1) the financial plan commit available RTTT or other state resources to a compensation plan that will not result in a reduction of the hourly rate of pay for educators at the Morgan School; (2) the Turnaround Plan not include a compensation system that is based upon student growth scores and the teacher performance ratings, and (3) the school committee, the Commissioner, and the HTA jointly study all forms of salary schedule constructs to determine which will be most effective in attracting and retaining high-quality teachers.³⁷

I recommend that the Board decline to adopt HTA's proposed modifications because (1) the current salary system does not adequately reward performance or serve as an incentive; and (2) the implementation of the performance based compensation system at Morgan Elementary School is an essential strategy for attracting and retaining strong teachers and for maximizing the rapid academic achievement for students. Further, delaying a change to a new performance based system in favor of further study, as requested by HTA, will not promote rapid improvement at the Morgan.

We must be confident that we are using existing resources in a manner that most benefits students. No other expenditure comes close to that which is devoted to personnel: often as much as 85 percent of a school's budget is dedicated to educator salaries and benefits.³⁸ Yet, in a typical school district, compensation has little alignment with performance. For example, the salary system that is currently in place in Holyoke primarily rewards longevity and credit accumulation, even though the evidence demonstrates that these factors have little relationship to educator performance. The research includes the following:

- Generally, teachers with master's degrees have little or no additional positive effect on student achievement compared to teachers who do not have advanced degrees.³⁹ The exception to this statement is in a few specific content areas--math and science – where researchers found student achievement to be slightly higher for high school students

37 HTA appeal pp. 46.

38 <http://cepa.stanford.edu/sites/default/files/stateRole.pdf>

39 Raegen Miller and Marguerite Roza, 2012. "The sheepskin effect and student achievement: De-emphasizing the role of master's degrees in teacher compensation." Washington, DC: Center for American Progress. Available: http://www.americanprogress.org/wp-content/uploads/issues/2012/07/pdf/miller_masters.pdf

whose math and science teachers held advanced degrees.⁴⁰ Approximately 90 percent of the master's degrees held by teachers are degrees attained from education programs that tend to be unrelated to or unconcerned with instructional impact.⁴¹

- The traditional structure is built on the assumption that teachers get better with experience. While it is true that novice teachers, particularly in their first year, experience a steep learning curve, teacher performance tends to plateau after 6 to 10 years.⁴²
- “Although teachers with master’s degrees generally earn additional salary or stipends – the so-called ‘master’s bump’ – they are no more effective, on average, than their counterparts without master’s degrees.”⁴³

Indeed, for some teachers, the current salary schedule, which bases pay raises solely on time served in the district and credits earned, is increasingly cited as a disincentive for high performing teachers to stay in teaching and threatens to undermine morale. Critics of the status quo salary schedule argue that in fact, misaligned compensation systems are “thought to be especially acute in difficult-to-staff schools where the working conditions are more difficult, yet the compensation, due to the single salary schedule, is often similar to schools with better working conditions.”⁴⁴ Thus, using the district-wide salary schedule in Holyoke as the salary schedule at the Morgan ignores the working conditions and challenges of teaching at the Morgan.

The performance based compensation system included in the Morgan Turnaround Plan takes a different approach. The system is modeled on the performance based compensation system that is in place in the Lawrence Public Schools. Contrary to the HTA’s characterization, the Morgan compensation system is not a “pay for performance” system, wherein increases in teacher compensation are tied directly or solely to increases in student achievement. Instead, the Turnaround Plan includes a compensation system that differentiates among teachers and pays them based on several factors, including:

40 Dan Goldhaber and Dominic Brewer, 1998. “When should we reward degrees for teachers?” *The Phi Delta Kappan* 80(2): 134-138.

41 National Center for Education Statistics, “2003-2004 Schools and Staffing Survey” as cited by Miller and Roza, 2012.

42 Eric A Hanushek, John F. Kain and Stephen G. Rivkin, “Teachers, Schools and Academic Achievement.” Working Paper 6691 (National Bureau of Economic Research, 1998).

43 Miller and Roza, 2012, p.1.

44 Thomas Dee and James Wyckoff, 2013. “*Incentives, Selection, and Teacher Performance: Evidence from IMPACT*.” NBER Working Paper No. 19529).

- A career ladder that includes five tiers – Novice, Developing, Career, Advanced, and Master – that compensates teachers commensurate with two critical factors: teacher development and impact on students.
- Taking on differentiated roles that are expected to have impact school-wide and to have an impact on student growth and learning. Such roles might include, for example, serving as a data specialist to lead common planning time discussions about Morgan data. These roles will be embedded in the career ladder tiers described above.
- Increased pay for taking on a teaching position at Morgan Elementary School and meeting annual goals as described in Appendix A of the Morgan turnaround plan.
- Educator effectiveness as measured by the educator evaluation system, including the Summative Performance Rating and the Student Impact Rating.
- Professional Growth.
- Student Academic Growth.

In sum, this compensation system provides a career ladder where advancement is based on a holistic measure of teacher effectiveness. Thus, the research offered by HTA on performance-based compensation systems is not relevant to the system being implemented at Morgan Elementary. The system included in the Plan provides incentives and rewards that go well beyond performance-based pay, as we have described above, including a career ladder that offers differentiated roles for teachers who demonstrate evidence of success with students and continued development in their practice. This sophisticated differentiated compensation system holds promise for improving student outcomes and is supported by the research.

For example, recent research by Thomas Dee and James Wyckoff on Washington, D.C.’s IMPACT program found that financial incentives linked to multiple measures of teacher performance (i.e., observational measures as well as student achievement data) improved the performance of high-performing teachers (effect size = 0.24).⁴⁵ Dee and Wyckoff maintain that their results provide “reasonably credible evidence” on the effects of these performance based compensation systems such as the IMPACT system in DC and the structures described in the Morgan’s proposed compensation plan.⁴⁶ They conclude that “overall, the evidence presented in

⁴⁵ Dee and Wyckoff, 2013.

⁴⁶ Dee and Wyckoff, 2013, p.1.

this study indicates high-powered incentives linked to multiple indicators of teacher performance can substantially improve the measured performance of the teaching workforce.”⁴⁷

Moreover, the existence of a performance based compensation system will attract strong teachers to apply to work at the Morgan and reward them for their efforts in ways that the current “step-and-lane” salary schedule does not. Effective teachers will advance at a faster pace and thus earn more in their initial years as well as during their teaching career than they would under the existing City of Holyoke teacher contract.

Ballou and Podgursky (1993) analyzed the Schools and Staffing Survey, which is the only existing national survey of teachers. Ballou and Podgursky’s research challenged traditional notions that suggested teachers would oppose performance-based pay: “Counter to the common belief in the profession that performance pay would demoralize teachers who did not receive financial awards, non-recipients in districts that used performance pay were not hostile toward it. In fact, they were generally more supportive of performance pay than teachers in districts that did not use it. And although there is a widely held belief that teachers of low-performing students would oppose performance pay as unfair, the researchers found that teachers of disadvantaged and low-achieving students were more supportive of performance pay than other teachers.”^{48,49} Likewise, in a poll conducted for The Teaching Commission, Public Agenda found that 85 percent of teachers and 72 percent of principals said that providing financial incentives would help to attract and retain high-quality teachers. (The Teaching Commission, 2004. *Teaching at risk: A call to action*. New York).

The HTA also argues that the compensation system should be modified because the pay

47 Dee and Wyckoff, 2013, p.28.

48 Source: Ballou, D., & Podgursky, M. (1993). Teachers’ attitudes toward merit pay: Examining conventional wisdom. *Industrial and Labor Relations Review*, 47(1), 50–61, as cited by the Center for Educator Compensation Reform, “Building Teacher and Community Support for New Compensation Systems.” Available: http://www.cecr.ed.gov/researchSyntheses/Research%20Synthesis_Q%20F21.pdf

49 For additional research on this issue see: Milanowski, A. (2006). *Performance pay system preferences of students preparing to be teachers* (WCER Working Paper No. 2006-8). Madison, WI: University of Wisconsin–Madison, Wisconsin Center for Education Research. Retrieved January 11, 2011, from http://www.wcer.wisc.edu/publications/workingpapers/Working_Paper_No_2006_08.pdf) In that study, Milanowski conducted a survey of young adults who were preparing to teach. Milanowski found that these students who planned to enter classrooms said they preferred some form of performance pay.

50 While reviewing the Morgan School Turnaround Plan, an editing error was identified in the Transition to the Career Ladder section of the Compensation Plan on page 45. The spreadsheet provided to the HTA in discussions regarding the compensation plan contained the correct amount for a teacher on Step 6, but incorrect information was contained in the Turnaround Plan. The transition of teachers who are on step 6 of the Holyoke Teachers Association contract should read as follows:

Current Step	Career Level Placement	2014-2015 Salary
6	Career Level II	\$61,500

Were a Morgan teacher at Step 6 to remain at the school in a Career Level II position, he or she would receive a pay increase of \$9,354, rather than an increase of more than \$13,000, based on the corrected information.

does not adequately compensate teachers for the number of hours they will be working. In fact, teacher compensation for the upcoming school year will increase from 2013-2014⁵⁰. During the 2014-2015 school years, teachers who remain at Morgan will receive at least \$1,500 and as much as \$9,350 in addition to the \$5,300 stipend they have been receiving as part of the Level 4 agreement which had been in place for the prior year – these teachers will receive an average salary increase of \$5,000 beyond the previously-established \$5,300 stipend. In addition, teachers who had been at Morgan and remain at Morgan will earn more pay under the compensation system set out in the Turnaround Plan than they would receive under the system set out in the district collective bargaining agreement.

The HTA argues that the career ladder compensation system will not attract and retain highly qualified teachers and undermines the turnaround plan's ability to maximize the rapid achievement of students. For example, the union presents an argument that compensation should be calculated based on an hourly rate basis for additional time. However, most effective teachers routinely work hours similar to those built into the new Morgan school day without additional compensation. These hard-working teachers have been effective in their own classrooms, but have seen other teachers paid the same salary amount for working fewer hours and having less positive impact on students. The Final Plan formalizes time for professional collaboration, lesson planning, and working with individual students during the workday, and not after the end of the school day. Many teachers will be attracted to working in a different environment with clearer expectations, and in a professional community focused on dramatically improving student learning in schools where students have not already experienced the best education.

The career ladder system offers higher annual compensation as well as more professional working conditions. A new teacher with a Masters degree will make \$47,000 at Morgan next year, but only \$41,042 in most Holyoke schools and \$46,342 with an extended learning time stipend. In five years, this teacher could be making at least \$61,500 on the career ladder, and potentially more if he or she receives Summative Performance Ratings of Proficient or Exemplary, while in other Holyoke schools he or she would make \$48,649 regardless of teaching quality. Such teachers are also eligible to serve as an Advanced teacher and receive compensation of \$76,000.

The HTA asserts that the performance based compensation system should be modified because it relies on student growth. Yet, the Morgan compensation system will not use student growth as the sole determinant of compensation or career advancement. Student growth will be only one factor in a multiple measure system that includes summative performance ratings in the educator evaluation system (which is based on professional practice judgments, including observation and artifacts teachers collect themselves).

The HTA criticizes the compensation plan because it alleges that student growth scores are “unreliable.”⁵¹ ESE’s analysis demonstrates alignment between the summative performance ratings and student growth percentiles (SGP): Using 2012-2013 statewide evaluation data, where educators had been rated as “Exemplary” or “Proficient” in the summative performance rating, their students were more likely to have high or moderate learning gains as measured by SGP. The students of educators who had been rated as “Unsatisfactory” or “Needs Improvement” generally had lower growth percentiles. This analysis indicates that the summative performance rating is related to improved student outcomes.

Taken together, the findings related to student growth percentiles provide early evidence that the educator evaluation system is working as one would hope – the educators who have been rated the strongest on the basis of professional judgment are also, on average, those who have the strongest impact on student learning. For these reasons, the HTA’s insistence that student growth be eliminated entirely from the compensation system is unwarranted.

Additionally, the HTA’s proposed modification should not be accepted because it is neither affordable nor sustainable, two requirements I placed on the new compensation model. The HTA’s proposed modification would result in teachers continuing to receive the \$5,300 stipend as well as an additional \$15,000 per teacher for the proposed teacher work year outlined in the turnaround plan.

Finally, the HTA asserts that the performance based compensation system set out in the Turnaround Plan should be modified because it violates the Achievement Gap Act by increasing the number of hours teachers will work without increasing teachers’ pay proportionately. As reflected in the May 30, 2014 memorandum from Department Counselors Deborah Steenland and Lucy Wall, the HTA’s argument unreasonably constrains the authority provided by the Achievement Gap Act to extend the school year and the school day in a chronically

51 HTA appeal, p. 44

underperforming school. It defies common sense to conclude that the Legislature would provide less flexibility in the context of addressing the needs of students in a Level 5 school than would otherwise be available.⁵²

The alternative dispute resolution process in the Turnaround Plan is necessary to ensure that decisions related to staff are handled swiftly and consistently with the requirements of the Achievement Gap Act.

(HTA Requested Modification #11 and pp. 47-49 of HTA appeal)

The HTA requests that the alternative dispute resolution process be removed from the plan and replaced with the traditional grievance and arbitration process.⁵³ In support of its position, the HTA erroneously states that “the Association and its members are left with no way to enforce any of the terms of the agreement, whether they are related to the Final Plan’s terms (e.g., teacher dismissal, layoffs) or not (e.g., health and safety, retirement).”

First, the Final Plan explicitly provides that “the dismissal of a teacher with professional teacher status will be governed by the process set out in G.L. c. 69, § 1J(o).” See Morgan Plan, p. 41. The statute provides that a teacher with professional teacher status may seek review of a dismissal decision through an expedited arbitration process.⁵⁴

Second, a Level 5 school requires a different grievance process than what is provided for in the district’s collective bargaining agreement.⁵⁵ This is the case for two reasons: (1) the decision makers in a Level 5 school are different than the decisions makers in non-Level 5 schools; and (2) there is additional urgency in a Level 5 school for working condition issues to be resolved quickly.

As to the first issue, the Turnaround Plan includes a dispute resolution process that allows decisions to be made by the appropriate parties. For example, the current grievance and

52 The HTA’s appeal includes legal arguments regarding the compensation system. I have asked members of my legal staff to address those arguments in a separate memorandum to the Board.

53 Pursuant to the Achievement Gap Act, and in connection with the Turnaround Plan, I required the School Committee and the HTA to negotiate in good faith for 30 days regarding changes to the school’s working conditions. See Morgan School Turnaround Plan at pp. 48-49. Although HTA and the School Committee negotiated and discussed, among other items, the dispute resolution process that is part of the Turnaround Plan, they did not reach agreement.

54 The statute provides, in part: “A teacher with professional teacher status in a school declared underperforming or chronically underperforming may be dismissed for good cause; provided, however, that the teacher receives 5 days written notice of the decision to terminate which shall include without limitation an explanation of the reason why the commissioner or superintendent is not retaining the teacher in the school; provided, further, that the teacher may seek review of a termination decision within 5 days after receiving notice of the teacher’s termination by filing a petition for expedited arbitration with the commissioner....”

55 See, the memorandum to the Board of Elementary and Secondary Education dated May 30, 2014 from the Department’s Legal office.

arbitration process included in the HTA's collective bargaining agreement requires the Superintendent to hear and decide grievances at Level 2, and the School Committee to hear and decide grievances at Level 3. But, the Achievement Gap Act expressly provides that a Level 5 school receiver has full operational and managerial control over the school. Likewise, the regulations provide that a receiver for a Level 5 school has all of the powers that the superintendent previously had over the school.⁵⁶ Therefore, the process to resolve employee disputes at a Level 5 school should not involve the Superintendent or the School Committee, but should involve the Receiver. The dispute resolution process in the Turnaround Plan does exactly that.⁵⁷

With respect to the second issue, the dispute resolution process included in the Morgan Turnaround Plan is designed to provide prompt resolution of concerns. The time frames in the alternative dispute resolution process are accelerated so that disputes will be resolved quickly. In comparison, under the existing grievance and arbitration process, it is not unusual for more than a year to elapse between the time an incident occurs, a grievance is filed and an arbitrator issues a decision. Resolving concerns quickly will lessen distractions and allow teachers to maintain their primary focus on the students and the classroom.

The alternative dispute resolution process included in the Turnaround Plan, however, does not sacrifice due process for speed. It provides a full and fair opportunity for teachers to raise issues of concern. The process includes that a union representative may be part of the process at every stage. (Turnaround Plan at p. 41). It also provides teachers with the opportunity to meet with the principal or the receiver to discuss concerns; and it requires the principal and the receiver to provide his or her decision in writing. In sum, the Board should decline the HTA's requested modification as the dispute resolution process included in the Plan will lead to the fair and prompt resolution of disputes that arise at the Morgan School.

Conclusion

I believe that the Level 5 Turnaround Plan is sound, well-reasoned, and designed to maximize the rapid academic achievement of students at the Morgan Full Service Community

⁵⁶ 603 CMR 2.06 (5)(a) ("A receiver appointed by the commissioner for a school in Level 5 pursuant to M.G.L. c. 69, s. 1J(r), shall have all of the powers that the superintendent previously had over the school and all of the powers granted to a receiver for a Level 5 school by M.G.L. c. 69, s. 1J. The receiver shall report directly to the commissioner.")

⁵⁷ See also the memorandum to the Board of Elementary and Secondary Education dated May 30, 2014 from the Department's Legal office.

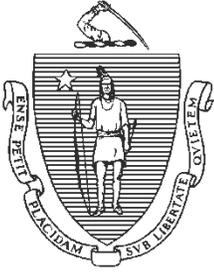
School. At multiple stages of the receivership process – when developing the Preliminary Turnaround Plan; when developing the Final Turnaround Plan; and in considering the appeal of the Final Plan – I have given considered thought to the input of the LSG, the HTA, and the Holyoke School Committee, and in fact am recommending that the Board adopt several of the proposed modifications.

The challenge at Morgan is not a matter of transforming an adequate school program to good or great levels. Our first job, as this school enters receivership, is to secure the basics of a sound literacy program, a sound mathematics program, and a well-functioning academic curriculum, including a sound STEM focus. We need to establish an effective instructional program and quickly move to higher levels of functioning.

The turnaround work at Morgan will be realized only through substantial reform that will require strategic effort, in collaboration with an experienced turnaround partner. I know this work is challenging. I do not assume that Morgan's status as a Level 5 school is due to a lack of effort or concern by the adults working there. I also know, however, that Morgan students need and deserve a much stronger education than they have received over the past several years. I have every conviction we can do better. I am confident that the Turnaround Plan I have developed provides the opportunity to realize this aspiration.

EXHIBITS

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Mitchell D. Chester, Ed.D.
Commissioner

Proposed Modifications to the Morgan Preliminary Turnaround Plan: Information regarding adopted modifications

To: Superintendent Sergio Paez
Mayor Alex Morris, Chair, Holyoke School Committee
Morgan Elementary School Local Stakeholder Group

From: Mitchell D. Chester, Ed.D., Commissioner

Date: April 18, 2014

Today, I released my final Level 5 school turnaround plan for Morgan Elementary School.

Pursuant to M.G.L. c. 69, § 1J(p), the Superintendent, the Holyoke School Committee, and the Morgan Local Stakeholder Group had the opportunity to propose modifications to the plan. (Proposing modifications was not required.) Superintendent Paez and the School Committee did not propose any modifications to the Morgan preliminary turnaround plan; the Local Stakeholder Group submitted its proposed modifications on April 6, 2014.

I appreciate the thoughtful input of the Local Stakeholder Group and have considered the modifications it proposed. Below, I provide information about the modifications I have chosen to adopt and those I have declined to adopt. For those I have adopted, I have provided information about where they are incorporated into the final turnaround plan.

Modifications I have adopted in the final Morgan turnaround plan

Priority Area 1:

No modifications were proposed for this Priority Area.

Priority Area 2:

No modifications were proposed for this Priority Area.

Priority Area 3:

- *Include “If student growth in the Holyoke Public Schools other than Morgan outstrips student growth at Morgan, the superintendent and the receiver will meet to identify promising practices in the district that might be incorporated at Morgan.”*
 - This has been incorporated into Strategy 3.5.

Priority Area 4:

- *Include “the receiver should put an intensive focus on attendance in Pre-K and Kindergarten.”*
 - This has been incorporated into Strategy 4.4.

Appendix A/Working Conditions

- *In the last “sub-bullet” in the middle of page 39, remove the remainder of the sentence after the words “Tutoring of students as needed” [the rest of the sentence contains a mischaracterization of the work of Special Education and ELL teachers as “tutoring”]*
 - This language has been clarified in Appendix A, Section I (in the section regarding expectations for staff members).

Other Proposed LSG Modifications:

- *Insert where appropriate: “In order to assure high quality services and supports for students with disabilities, the Receiver will develop and implement plans and processes for the following essential elements of a Special Education system: effective facilitation of the Special Education Team process under the leadership of a licensed special education professional; identifying, hiring, and supporting an appropriate number of licensed special education teachers, paraprofessionals, and other specialists needed to meet the requirements of IEP and 504 accommodations; and, implementation of multiple interventions and services to be provided at the school in order to meet the individual needs of Students with Disabilities.”*
 - Additional information about students with disabilities has been incorporated into Strategy 2.7, and Strategy 4.6 has been added.
- *Insert where appropriate: “In order to protect the rights of students to the Least Restrictive Environment, existing Holyoke Public Schools district protocols, including the involvement of HPS educators external to the Morgan School, will apply to any contemplated assignment of a Morgan student to a special education placement outside the school.”*

- Language regarding compliance with federal and state special education regulations has been incorporated into Strategy 4.6.

Proposed modifications that will be addressed in the development of the Memorandum of Agreement

The Local Stakeholder Group also proposed a variety of modifications relating to assorted operating conditions for the school. Although I have not incorporated these changes into the turnaround plan, these operational issues will be addressed during the creation of the Memorandum of Agreement (MOA) that is currently being developed between ESE, Project GRAD, and Holyoke Public Schools. These issues include:

- The agreements between Holyoke Public Schools and the US Department of Justice related to services for ELLs
- The name of the school
- How parent and family complaints will be handled at Morgan
- How special education services (including external special education placements) will be handled between Morgan and the district
- District's liability for Morgan employees selected by the Receiver
- The impact of district funding and staffing reductions on Morgan
- Grant applications by Morgan School
- The impact of a potential future district attendance zone revision or reconfiguration on Morgan

Modifications I have declined to adopt in the final Morgan turnaround plan

Priority Area 1:

- No modifications were proposed for this Priority Area.

Priority Area 2:

- No modifications were proposed for this Priority Area.

Priority Area 3:

- *Include "If student growth in district outpaces Morgan's growth, Commissioner will reconsider receivership arrangement at Morgan."*
 - I decline to adopt this modification because my assessment of when the Morgan will exit Level 5 status will be based on a variety of factors. For example, as part of my annual assessment of the school, I will consider the progress on the implementation of the Level 5 school turnaround plan, including:
 1. Attainment of annual benchmarks in each Priority Area of the Level 5 turnaround plan
 2. Attainment of Measureable Annual Goals (Appendix B)
 3. Institutionalization of the Conditions for School Effectiveness

(<http://www.doe.mass.edu/apa/ucd/CSE.pdf>)

4. Likelihood of sustainability of the academic progress made by the school if the school is returned to the district

Priority Area 4:

- *Include “the plan should reflect that Pre-K at Morgan is a top priority item for the school, and that the receiver should make a firm commitment to open a Pre-K classroom there in Fall 2014.”*
 - I decline to adopt this modification, because the plan clearly states (Strategy 4.4) our desire to create a Morgan pre-kindergarten program, pending available space.
- *Strike the following two sentences: “The overwhelming amount of material at Morgan is not organized for easy access by teachers. In mathematics, the current text does not appear to be well aligned with the Common Core State Standards.”*
 - I decline to adopt this modification because ESE and Project GRAD staff have been present at the school and viewed the disorganization of materials; we have also heard this from teachers. We have reworded the Challenges section of Priority Area 4 to indicate that the extent of Morgan’s curricular material alignment with state standards is currently unclear.
- *Insert “teachers who do not hold the SEI Endorsement will be granted appropriate release time to complete the training if training options overlap with the extended work day for teachers.”*
 - I decline to adopt this modification. However, ESE and Project GRAD are working together to plan the SEI endorsement training, and to the degree possible, plan to embed it in the school’s PD.
- *Insert “in light of historic stagnation at ELL Level 3 among many Morgan students, in planning for supports for ELLs, special attention and focus will be placed on the needs and progress of students at this level.”*
 - I decline to adopt this modification, because the turnaround plan includes a consistent, school-wide focus on SEI strategies and differentiated instruction that will include appropriate instruction for Level 3 ELLs. The Morgan plan focuses on SEI instruction to ensure that **all** students receive what they need; it does not only target specific subgroups of students.

Priority Area 5:

- *While the Turnaround Plan includes information about planned efforts related to family and community engagement, it does not appear that these efforts will follow the Full Service Community School development strategy used in the Holyoke Public Schools. If this is incorrect (if plans are in place for the Full Service Community School strategy to be continued at Morgan), a commitment to the FSC strategy should be directly stated in the Turnaround Plan. Alternatively, if a different strategy is planned, the LSG requests that “Full Service Community” be removed from the school’s name.*
 - I decline to adopt this modification. I recognize that Morgan students come to school with many needs and challenges, and I am committed to ensuring that all students’ needs are met so they can

learn to their full potential. The turnaround plan includes multiple strategies to address students' and families' needs (see especially Priority Area 5), and to engage community stakeholders in the process of turning around the school (including, for example, Strategy 3.4); the turnaround plan also includes staff positions designed to lead the school's engagement work with both families and community partners. While there may be slight differences between Holyoke's definition of what constitutes a "full service community school" and what the turnaround plan describes, the differences are not so radical that the school's name needs to be changed to something other than Morgan Full Service Community School.

Appendix A/Working Conditions:

- *The LSG acknowledges a gap between the increased hours/days to be worked by teachers according to the Turnaround Plan and the proposed teacher pay rates in the plan. The LSG suggests revisions to the required hours/days worked by teachers and/or the compensation provisions of the plan in order to provide for a compensation structure that will support the receiver's ability to hire and retain high-quality teachers.*
 - I decline to adopt this modification. The final turnaround plan includes a new performance-based compensation system that I believe will support the Receiver's ability to attract and retain high-quality teachers who are committed to the goals of the turnaround plan.
 - Lawrence Public Schools has a similar compensation approach; this compensation system has been an incentive the district uses to attract applicants and retain teachers.
- *Regarding the compensation of teachers for 2015-16 and beyond: in light of a lack of research supporting compensation systems based on student and teacher performance as effective in improving student achievement, the LSG proposes tabling the proposed performance-based compensation system in order to allow for further study of multiple forms of salary schedule constructs in order to determine which will be most effective in attracting and retaining high-quality teachers at Morgan School.*
 - I decline to adopt the requested modification and, as noted above, have decided to implement the performance-based compensation plan for the upcoming school year. For the reasons spelled out in Appendix C of the preliminary turnaround plan, the development of a performance-based compensation plan is an essential strategy for maximizing the rapid academic achievement of students at the Morgan school. Further, early results from the Lawrence Public Schools, where a similar compensation plan is in place, are demonstrating the efficacy of compensation based on performance that is tied to opportunities for teacher leadership and expanded responsibility. It is envisioned that a new professional compensation system, coupled with a rich professional learning environment and a high-performing, collaborative culture, will contribute to increases in student outcomes by attracting and retaining high potential teachers and leaders.

- *Replace the final bullet in the Dispute Resolution section with the following: “If the employee is not satisfied with the decision of the Receiver, the employee may request resolution by an external arbitrator using a “fast-track” arbitration process similar to that currently in use for arbitration of grievances related to Level 4 schools.”*
 - I decline to accept this modification. The fast-track arbitration procedure set out in G.L. c. 69, § 1J(o) is applied specifically to dismissals of teachers with professional teacher status from Level 5 schools. This procedure will be used for such dismissals. For issues other than dismissals, the dispute resolution process in the turnaround plan will be an effective process for resolving concerns in an expeditious manner.

Other Proposed LSG Modifications:

- *Insert where appropriate: “The Morgan Local Stakeholder Group will remain in existence throughout the implementation of the Turnaround Plan. Copies of all reports related to Turnaround Plan progress will be shared with the Local Stakeholder Group. Representatives of the Department of Elementary and Secondary Education and/or Project GRAD will meet quarterly with the LSG to report on progress in implementing the Turnaround Plan.”*
 - I appreciate the service that Morgan’s Local Stakeholder Group (LSG) has provided, first making its recommendations for the Level 5 turnaround plan, and then proposing modifications to the preliminary plan as the final plan was being developed. The law does not provide a continuing role for the LSG. However, there will be many opportunities for LSG members to remain involved with Morgan. Several of these opportunities are highlighted in the turnaround plan, including the School Site Council (Strategy 5.1), the ELL Parent Advisory Committee (Strategy 5.1), the working group around a potential STEM magnet middle school at Morgan (Strategy 3.5), and the stakeholder input process in the development of pre-K for Morgan (Strategy 4.4).
- *Additionally, LSG members want to call attention to the critical importance of student MCAS results as measured by DESE’s Performance and Progress Index (PPI) system in the Commissioner’s decision to declare Morgan a Level 5 school, and to call for the same level of focus on MCAS results and PPI as the single most critical indicator of improvement at Morgan School during the receivership period.*
 - I share the LSG’s belief in the critical importance of MCAS results as a measure of progress in Level 5 schools. The Morgan Level 5 turnaround plan already includes Priority Area benchmarks and Measurable Annual Goals (Appendix B) that are based on MCAS scores.
 - I will evaluate the Morgan school at least annually. The purpose of the evaluation will be to determine whether the school has met the annual goals in its turnaround plan and assess the implementation of the plan at the school. However, MCAS scores aren’t the only measure I will

consider as I determine whether Morgan is making progress, and eventually, whether Morgan is ready to exit Level 5 status. I will also consider

- Attainment of annual benchmarks in each Priority Area of the turnaround plan
- Attainment of the Measurable Annual Goals (Appendix B)
- Institutionalization of the Conditions for School Effectiveness
(<http://www.doc.mass.edu/apa/ucd/CSE.pdf>)
- Likelihood of sustainability of the academic progress of the school if the school is returned to the district

Exhibit 2: Core Strategies Taught in the Full Teacher SEI Endorsement Course, 2013-2014

- Vocabulary
 - 7 Steps
 - Tiered Vocabulary
 - Cognate Awareness
 - Sentence Frames
 - Word Wheels
 - Lexical Arrays
 - Word Form Chart
 - Word Families
- Reading
 - Identifying and Analyzing Text Features
 - Think-aloud
 - Reciprocal Teaching
 - Partner Reading
 - Analyzing Text Genres and Organization
 - Close Reading with Text-dependent Questions
 - Double Entry Journals
- Writing
 - Cut-n-Grow
 - Information Gap
 - Language Experience Approach (LEA)
 - RAFT
 - Ratiocination
 - Round Table
 - Sentence Combining
 - Write-around
- Interaction Strategies
 - Anticipation Guide
 - Clock Buddies
 - Continuum
 - Divide & Slide
 - Exit Ticket
 - Expert Groups
 - Final Word Protocol
 - Gallery Walk
 - Graphic Organizers
 - Jigsaw
 - Last One Standing
 - Numbered Heads Together
 - Quick Write
 - Snowballs
 - Thinking Notes
 - Think-Write- Pair-Share
 - T-P-S
 - T-P-Square-S
 - Turn & Talk
 - Visual Scaffolding
 - Zip Line