

**Corrective Action Requirements for Milwaukee Public Schools
District in Need of Improvement
Background
(Draft 6/18/09)**

The people of Milwaukee and throughout Wisconsin are coming together around the shared responsibility and sustained effort to ensure a quality education for every child in Milwaukee.

In the past years, the community has stepped forward to support Milwaukee Public Schools (MPS). Numerous groups have convened and multiple studies were conducted on the school district's programs, practices, and student achievement. All have had the primary goal to support academic success for the children of Milwaukee. Nationally-recognized organizations, community-organized councils, and district-convened committees have produced a series of reports that have identified areas of concern. "Raising Achievement in the Milwaukee Public Schools: Report of the Strategic Support Team of the Council of Great City Schools," "African American Education Report 2007," "Working Together, Achieving More: District Strategic Plan," and "Toward a Stronger Milwaukee Public Schools," by McKinsey & Company, outline the steps to ensure that all MPS students have access to a comprehensive, quality education provided by an efficient and effective school district.

The above reports are strong calls for transformation of MPS from peers and from the community; however, those calls are now underscored by the required federal sanctions in the Elementary and Secondary Education Act (ESEA) and the *Jamie S.* settlement approved by the federal district court. In short, the calls for transformation have now become requirements to transform.

The Wisconsin Department of Public Instruction (DPI) is required by ESEA to annually identify schools and districts that did not make adequate yearly progress (AYP) toward meeting the state's established objectives in four areas. These objectives include:

- Testing 95 percent of their enrolled students in the statewide reading and mathematics assessment;
- Meeting state established proficiency targets in reading based on Wisconsin's statewide test;
- Meeting state established proficiency targets in mathematics based on Wisconsin's statewide standardized test; and
- Maintaining a high school graduation rate of at least 80 percent of the statewide average and elementary and middle school attendance rates of at least 85 percent of the statewide average, or show growth.

Milwaukee Public Schools has not made adequate yearly progress for five consecutive years in reading and mathematics at the elementary, middle, and high school grade spans. MPS once again did not meet AYP in reading and mathematics for the 2008-09 school year and is now a DIFI-Level 4.

Under ESEA, DPI has required MPS to take corrective action designed to meet the goal of having all students achieve at the proficient and advanced student academic achievement levels. Previous corrective action requirements have created a strong foundation and progress has been made; however, a more aggressive approach is needed to address the urgency, magnitude, and complexity surrounding the district's performance.

In 2007, DPI directed the district to restructure its organization through the MPS District and School Accountability Model. This directive was based upon information from multiple sources including the Council of Great City Schools which described MPS as "a system of schools, not a school system." A system of central accountability, too long absent from MPS, is essential to ensure that strategies to improve student achievement are consistently implemented in every MPS building. Under the District and School Accountability Model, MPS grouped its 207 schools into nine clusters to ensure communities of learning, quality of instruction, and accountability in every building. While the district has made progress in implementing these "System of Support" clusters, the district must strengthen this effort. The district must define more specifically who reports to whom in each of the nine clusters and how supervisors within the clusters are assigned duties. Further, the district must make clear that responsibility for oversight of each of the nine clusters rests directly with the MPS superintendent.

This accountability model is also essential to implement the court-approved *Jamie S.* settlement. The federal district court found that MPS systemically violated student rights in its use of suspension. The district's use of suspension was also identified as a serious concern by the Council of Great City Schools. Suspension exacerbates the district's student attendance problem and leads to lower student achievement and graduation rates. Research tells us that an effective educational system must provide a system of early intervening services PK-12 to address the academic and behavioral needs of all students before students fail. The *Jamie S.* settlement is based on this research. Under the settlement and as corrective action to address its DIFI status under ESEA, MPS must develop and implement a system of coordinated early intervening services PK-12 in every MPS school.

In 2008-09, MPS received \$121.7 million of federal entitlement funds through the Elementary and Secondary Education Act (ESEA), Individuals with Disabilities Education Act (IDEA), and the Carl Perkins Act. MPS also received an additional \$25 million of federal discretionary grants through DPI.

For 2009-10, MPS is expected to receive at least \$126 million in federal entitlement funds plus at least \$95.6 million in federal funds through the American Recovery and Reinvestment Act (ARRA). In addition, MPS will be eligible for a large share of the \$42 million Title I School Improvement money coming to Wisconsin through ARRA.

Beginning in 2009-10, the State Superintendent will appoint a federal funds trustee who will serve as an inspector general for use of federal funds by MPS and provide increased fiscal oversight for the numerous federal grants the district receives. The trustee will also meet at least quarterly with the Milwaukee Innovation and Improvement Advisory Council to provide council members, the State Superintendent, MPS officials, and the public with greater understanding of MPS' use of federal funds. The federal funds trustee will also work in concert with other DPI

staff to assure that the district fulfills benchmarks with the 2009-10 corrective action requirements.

To raise achievement, close achievement gaps, and ensure that every MPS student graduates from high school, specific corrective actions are required to:

I. Increase Student Attendance through Collaborative Community-wide Solutions.

- A. Form school and district parent action teams that build upon current efforts by using the nine cluster infrastructure to focus on regular attendance for all students in all MPS schools.
 - 1. Coordinate with the DPI VISTA project to use resources, including VISTA members assigned to the Milwaukee-based Parents Plus of Wisconsin, to support each cluster.
 - 2. Coordinate support for parent engagement with the Milwaukee Innovation and Improvement Advisory Council.
- B. Collaborate and partner with the Milwaukee Innovation and Improvement Advisory Council to involve community organizations and non-profits in efforts to raise regular school attendance.
- C. Coordinate the work of City Year mentors with other efforts to improve attendance.
- D. Sustain and improve current Community Learning Centers, employing highly qualified teachers to provide academic tutoring in reading and mathematics to students with greatest needs.
- E. Implement before- and/or after-school tutoring in English/language arts and mathematics in all Title I SIFI schools.
- F. Implement a 9th grade support program in all high schools to ensure successful transition to high school.
- G. Implement a credit recovery program in all high schools for all students who are credit-deficient.

II. Ensure a System of Quality and Consistency in Curriculum, Instruction, and Assessment Using a System of Early Intervening Services (EIS) PK-12 for All Students. The system must be approved by the independent expert appointed by the federal district court to carry out the *Jamie S.* settlement and must include the following:

- A. Instruction in reading, mathematics, and positive behaviors for all students based on state standards, maximizing instructional time, using scientific research-based curricula provided by effective teachers, and monitored for implementation integrity.
 - 1. Implement 90-minute reading block and 60-minute mathematics block for grades K-3, 60 minute blocks in reading and mathematics in grades 4-8, and reading intervention courses for grades 9-12 in all schools.
 - 2. Implement the comprehensive district-wide plan for literacy that is standards-based, articulated across levels, and uses a limited number of programs which was part of the 2008-09 Corrective Action Requirements.

3. Continue implementation of a district-wide plan for mathematics instruction that uses a limited number of programs.
 4. Develop a district-wide assessment policy and system which includes standards-based formative, benchmark, and summative assessment that allows analysis and reporting at the student, classroom, and school levels.
- B. Universal screening of all students on reading, mathematics, and behavior, conducted at least three times a year, to determine levels of need, and progress in performance in core instruction.
 - C. Scientific research-based interventions (small group and customized) for reading, mathematics, and positive behavior provided to students based on measured relative need and implemented with integrity.
 1. Summer school with mathematics and reading focus in all Title I schools identified for improvement (SIFI).
 2. Extended calendars of a minimum of 30 additional days of instruction in one or two Title I SIFI schools must be implemented by the beginning of the 2010-11 school year.
 - D. Progress monitoring (two measures - performance and implementation integrity) for interventions that yield reliable and valid measures used by the school to determine the needed level of intensity of service, degree of implementation, and effectiveness of each specific intervention.
 - E. Parent/family/community involvement efforts of school personnel that inform about specific services being provided, solicits input for continuous improvement, actively involves the community in the operation of EIS, and measures the involvement of families over time.
 - F. Professional development for educators based on National Staff Development Council Standards including measured needs of the school that ensure improvement in student performance.
 - G. Educational leadership that effectively manages all components of a system of early intervening services, maximizes instructional time, uses problem-solving approaches, and periodically involves all stakeholders in evaluating the results of EIS using current data.

III. Ensure a Consistent, Transparent, and High Quality System of Accountability in Milwaukee Public Schools for School Improvement, Teacher Quality, and Financial and Operational Management.

- A. Meet, in accordance with federal law, all agreed-upon timelines and ESEA requirements for DIFI, SIFI, and the ESEA Consolidated Application.
- B. Continue the restructuring of the district and coordination of services through the MPS District and School Accountability Model, using the system of nine support clusters of MPS schools to ensure consistent implementation of the corrective action requirements.
- C. Use the nine support clusters to ensure accountability for school improvement through development, monitoring, and technical assistance related to implementation of school improvement plans in all MPS schools.

- D. Ensure all educators are appropriately licensed for their assignments, are highly qualified under ESEA, and are receiving professional development as specified by the Wisconsin Quality Educator Initiative (PI 34), state statute, and ESEA.
- E. Require induction support, including mentors, for all initial educators and educators with emergency permits or licenses beginning on the first day of school.
- F. Provide highly skilled and experienced teachers in schools categorized as high need and with low student achievement.
- G. Provide individually tailored support for principals in all Title I SIFI schools.
- H. Coordinate the use of federal funds with the DPI federal funds trustee.
- I. Design, implement, and use a data warehouse that meets the business, human resource, and education accountability needs of the school district.
- J. Transfer student records in a timely manner, between and among all MPS (including charter and partnership) schools and from all MPS schools to other schools, including parental choice schools, and aggressively pursue the receipt of student records from schools outside MPS.

**Corrective Action Requirements for Milwaukee Public Schools
District in Need of Improvement – Level 4 (2009-10)
*Implementation Benchmarks***

I. Increase Student Attendance through Collaborative Community-wide Solutions.

- A. Form school and district parent action teams that build upon current efforts by using the nine-cluster infrastructure to focus on regular attendance for all students in all MPS schools.
1. Coordinate with the DPI VISTA project to use resources, including VISTA members assigned to the Milwaukee-based Parents Plus of Wisconsin, to support each cluster.
 2. Coordinate support for parent engagement with the Milwaukee Innovation and Improvement Advisory Council.

Benchmarks:

- Establish an Action Team for Partnerships at each MPS school that includes parents, staff, community, and student representation when appropriate, which feeds into the school governance council by October 1, 2009.
 - Maintain a Central Services parent liaison representative and parent information specialists for each cluster. The parent liaison should meet with or contact school Action Teams bi-monthly and monitor team activities.
 - Coordinate with the DPI VISTA project to provide support to each cluster for establishing Action Teams. Assignments to each cluster will be made by October 1, 2009.
 - Establish a district Parent Action Team made up of representatives from each of the system of support clusters by October 1, 2009. The work of the district Parent Action Team should be coordinated with the Milwaukee Innovation and Improvement Advisory Council.
 - Train Action Team members and develop One-Year Action Plans by November 1, 2009, to increase regular attendance for all students.
 - Action Teams will incorporate comments from MPS stakeholders including the Milwaukee PTA Council and the Milwaukee Parent Congress on their One-Year Action Plans and begin implementation by December 1, 2009.
 - By June 30, 2010, parent liaisons and VISTAs will submit a report to MPS Administration summarizing the efforts of each Action Team and results for improving attendance in that cluster.
- B. Collaborate and partner with the Milwaukee Innovation and Improvement Advisory Council to involve community organizations and non-profits in efforts to raise regular school attendance.
- C. Coordinate the work of City Year mentors with other efforts to improve attendance.

Benchmarks (items B and C):

- Develop an alliance for attendance action plan, including the work of the City Year mentors, by October 1, 2009.

- Develop a city-wide dropout prevention and recovery plan that is coordinated with alliance for attendance efforts and submit it to DPI by December 1, 2009. The plan must include timelines for implementation beginning second semester.
 - Establish specific, coordinated, district-wide strategies for improving student attendance by November 1, 2009.
 - Submit a report summarizing actions to meet this requirement and results, including student attendance and graduation rates for the district and each school by June 30, 2010.
- D. Sustain and improve current Community Learning Centers, employing highly qualified teachers to provide academic tutoring in reading and mathematics to students with greatest needs.
- E. Implement before- and/or after-school tutoring in English/language arts and mathematics in all Title I SIFI schools.
- F. Implement a 9th grade support program in all high schools to ensure successful transition to high school.
- G. Implement a credit recovery program in all high schools for all students who are credit deficient.

Benchmarks (items D, E, F, and G):

- Recruit highly qualified teachers to provide *academic tutoring* that is aligned with the day school program in all Community Learning Centers (CLC) by November 1, 2009.
- Implement strategies to recruit students with greatest needs for tutoring services and to sustain their participation by the beginning of second semester.
- Provide academic tutoring in each CLC for at least 20 or 10 percent of students, whichever is greater, for at least three hours a week by November 30, 2009.
- Offer Supplemental Educational Services in all Title I SIFI, with priority given to Level 1 SIFI and above, by November 30, 2009.
- Submit to DPI by November 1, 2009, a description of the specific, coordinated, cross-district strategies that will be implemented in all high schools to achieve successful 9th grade transition.
- Submit to DPI by November 1, 2009, a description of the specific, coordinated, cross-district strategies that will be implemented in all high schools to ensure credit recovery for students who are credit-deficient.
- Monitor the implementation of tutoring programs and student progress regularly using at least teacher reports, grades, and attendance to measure student gains.
- Submit a report summarizing actions and school and district level results, including attendance and graduation rates by June 30, 2010.

II. Ensure a System of Quality and Consistency in Curriculum, Instruction, and Assessment Using a System of Early Intervening Services (EIS) PK-12 for All Students. The system must be approved by the independent expert appointed by the federal district court to carry out the *Jamie S.* settlement and must include the following:

- A. Instruction in reading, mathematics, and positive behaviors for all students based on state standards, maximizing instructional time, using scientific research-based curricula provided by effective teachers, and monitored for implementation integrity.
 1. Implement 90-minute reading block and 60-minute mathematics block for grades K-3, 60 minute blocks in reading and mathematics in grades 4-8, and reading intervention courses for grades 9-12 in all schools.
 2. Implement the comprehensive district-wide plan for literacy that is standards-based, articulated across levels, and uses a limited number of programs which was part of the 2008-09 Corrective Action Requirements.
 3. Continue implementation of a district-wide plan for mathematics instruction that uses a limited number of programs.
 4. Develop a district-wide assessment policy and system which includes standards-based formative, benchmark, and summative assessment that allows analysis and reporting at the student, classroom, and school levels.
- B. Universal screening of all students on reading, mathematics, and behavior, conducted at least three times a year, to determine levels of need and progress in performance in core instruction.
- C. Scientific research-based interventions (small group and customized) for reading, mathematics, and positive behavior provided to students based on measured relative need and implemented with integrity.
 1. Summer school with mathematics and reading focus in all Title I schools identified for improvement (SIFI).
 2. Extended calendars of a minimum of 30 additional days of instruction in one or two Title I SIFI schools must be implemented by the beginning of the 2010-11 school year.

Benchmarks:

- Title I grants include expenditures and plans for summer school for all Title I SIFI.
 - Interim and End-of-Year reports for Title I grants demonstrate successful implementation.
 - Submit a plan for the implementation of extended calendars in 2010-11 by February 1, 2010. The plan should describe the role of school action teams in selecting the schools to implement extended calendar.
- D. Progress monitoring (two measures - performance and implementation integrity) for interventions that yield reliable and valid measures used by the school to determine the needed level of intensity of service, degree of implementation, and effectiveness of each specific intervention.
 - E. Parent/Family/Community involvement efforts of school personnel that inform about specific services being provided, solicits input for continuous improvement, actively involves the community in the operation of EIS, and measures the involvement of families over time.
 - F. Professional development for educators based on National Staff Development Council Standards including measured needs of the school that ensure improvement in student performance.

- G. Educational leadership that effectively manages all components of a system of early intervening services, maximizes instructional time, uses problem-solving approaches, and periodically involves all stakeholders in evaluating the results of EIS using current data.

Additional benchmarks will be developed by the independent expert by September 1, 2009, and poised for implementation in the 2009-10 school year.

III. Ensure a Consistent, Transparent and High Quality System of Accountability in Milwaukee Public Schools for School Improvement, Teacher Quality, and Financial and Operational Management.

- A. Meet, in accordance with federal law, all agreed upon timelines and ESEA requirements for DIFI, SIFI, and the ESEA Consolidated Application.

Benchmarks:

- Submit the 2008-09 ESEA Consolidated End-of-Year Report by August 31, 2009.
 - Submit required corrective action resulting from 2008-09 ESEA monitoring by the deadline indicated in the monitoring report.
 - Submit the district ESEA Consolidated Application, including Title I ARRA funds, by August 31, 2009.
 - Submit the district IDEA application, including IDEA ARRA funds, by August 31, 2009.
 - Meet with DPI staff regarding required revisions to the ESEA Consolidated Application by October 30, 2009.
 - Update the district DIFI Plan for 2009-10 by October 15, 2009.
 - Submit evidence to DPI of parent notification of DIFI status by October 15, 2009.
 - Demonstrate compliance with all federal requirements for Title I SIFI during 2009-10 ESEA monitoring.
- B. Continue the restructuring of the district and coordination of service through the MPS District and School Accountability Model, using the system of nine support clusters of MPS schools to ensure consistent implementation of the corrective action requirements.
- C. Use the nine support clusters to ensure accountability for school improvement through development, monitoring, and technical assistance related to implementation of school improvement plans for all MPS schools.

Benchmarks (items B and C):

- Maintain an MPS DIFI Director, and designate Central Office leads for each section of the Corrective Action Requirements by July 1, 2009.
- The MPS DIFI Director, key MPS administrators, MPS School Improvement Supervisors, and the Board President or designee will meet monthly with the DPI Director of DIFI and key DPI administrators to monitor implementation of the Corrective Action Requirements.
- Each August the MPS Superintendent, MPS DIFI Director, and other key administrators shall meet with the State Superintendent and Cabinet to review implementation of the Corrective Action Requirements.

- D. Ensure all educators are appropriately licensed for their assignments, are highly qualified under ESEA, and are receiving professional development as specified by the Wisconsin Quality Educator Initiative (PI 34), state statute, and ESEA.

Benchmarks:

- Submit PI-1202 Fall Staff Report, which includes the position/assignment of all MPS staff by December 15, 2009.
- Submit PI-9550-IIC Highly Qualified Teacher Plan, which includes a listing of all core subject area teachers who are not highly qualified by December 15, 2009.
- Submit a list of educators who were hired after data was provided on the PI-1202 and supply evidence of whether each is appropriately licensed or has applied for a DPI license by February 1, 2010.
- Submit evidence that ESEA parental notification requirements regarding highly qualified teachers have been fulfilled by February 15, 2010.
- Correct any coding errors to the PI-1202 Fall Staff Report by March 1, 2010.
- Submit final PI-9550-IIC Highly Qualified Teacher Plan by June 1, 2010.

- E. Require induction support, including mentors, for all initial educators and educators with emergency permits or licenses beginning on the first day of school.

Benchmarks:

- Provide an electronic list of all first year initial educators (teachers, pupil services, administrators) and their mentors by September 1, 2009 (or the first day of school).
- Provide an electronic list of all first year educator assignments, school and/or building site(s) by October 1, 2009.
- Provide a description of the MPS induction support system for all initial educators (teachers, pupil services, administrators) by September 1, 2009 (or the first day of school). Include:
 - A description of the services that will occur at the school/building level for all initial educators.
 - A description of the mentor training programs (content and timelines) for teachers, pupil services, and administrators.
 - A description of the support seminars that is required for all initial educators.
 - A description of the ongoing orientation programs provided for all initial educators.
 - A description of how the induction support will be administered and implemented.
 - A description of how development of a professional development plan is integrated in the induction system.
 - A description of how the induction program will be evaluated both through formative and summative assessment and how the findings will be used to improve the program;
- Provide a description of the MPS induction support system for emergency permit and licensed teachers.
 - Provide an electronic list of all teachers hired on an emergency license or permit by September 1, 2009 (or the first day of school).

- Provide an electronic list of assignments, school and/or building site(s) and the induction support provided for all teachers hired on an emergency license or permit by October 1, 2009.
 - Provide an electronic list of all new (hired after October 1) first year initial educators (teachers, pupil services, administrators) and their mentors by December 15, 2009. Include their names, assignments, school and/or building site(s).
 - Provide an electronic list of all new (hired after October 1) teachers hired on an emergency license or permit by December 15, 2009. Include their names, assignments, school and/or building site(s), and the induction support provided for each.
 - Provide an electronic list of all new (hired after December 15) first year initial educators (teachers, pupil services, administrators) and their mentors by February 1, 2010. Include their names, assignments, school and/or building site(s).
 - By February 1, 2010, provide an electronic list of all teachers hired on an emergency license or permit after December 15, 2009. Include their names, assignments, school and/or building site(s) and the induction support provided for each.
 - Provide update reports on the implementation of induction activities to support first year initial educators and emergency permit and licensed teachers by November 16, 2009, March 15, 2010, and June 15, 2010.
- F. Provide highly skilled and experienced teachers in schools categorized as high need and with low student achievement.
- Benchmarks:
- Analyze data to determine distribution patterns of highly skilled and experienced MPS teachers by November 2, 2009.
 - Use the data to identify schools with high needs and low student achievement in need of highly skilled and experienced teachers by December 1, 2009. Priority must be given to Title I SIFI.
 - Recruit current highly skilled and experienced teachers for service in schools categorized as high need and with low student achievement by February 1, 2010.
- G. Provide individually tailored support for principals in all Title I SIFI schools.
- Benchmarks:
- All Title I SIFI principals attend the New Wisconsin Promise Conference in January 2010.
 - Select principals of Title I SIFI to attend the DPI Principals' Leadership Retreat in June 2010.
 - Report on the assessment of Title I SIFI principal professional development needs and the system established to meet those needs at the December and June DPI/MPS DIFI meetings.
- H. Coordinate the use of federal funds with the DPI federal funds trustee.
- Benchmarks:
- Participate in federal entitlement grant writing meetings with key DPI staff by August 17, 2009.

- The DPI federal funds trustee must review MPS federal entitlement grant applications, particularly ESEA and IDEA, to ensure funds are utilized to implement the corrective action requirements.
 - MPS financial and program staff provide jointly developed quarterly reports to the DPI federal fund trustee on the progress made in implementation of each federal entitlement program to ensure program objectives are met and funds are utilized in a timely and appropriate manner.
- I. Design, implement, and use a data warehouse that meets the business, human resource, and education accountability needs of the school district.
- Benchmarks:**
- Develop a plan by September 1, 2009, to train appropriate staff in each MPS school to ensure that teacher licensing, assignment, and mentoring data are entered correctly into the human resources database. Implementation of the training plan must begin no later than October 1, 2009.
 - Extend the process of developing data dashboards beyond administrators to classroom teachers. The teacher dashboards shall include timely data about the students in their classes.
 - Continue to integrate data elements into the data warehouse, including district and school financial data.
 - Continue to offer data retreats and professional development for school staff and key central services staff about using new and existing data tools.
 - Include a demonstration of the data warehouse as part of the December and May 2010 DPI/MPS DIFI meetings.
- J. Transfer student records in a timely manner, between and among all MPS (including charter and partnership) schools and from all MPS schools to other schools, including parental choice schools, and aggressively pursue the receipt of student records from schools outside MPS.
- Benchmark:**
- Establish an internal workgroup to review, update, and monitor the implementation of related districts policies and procedures by September 1, 2009.