



**Highly Qualified Teachers and
Improving Teacher Quality State Grants (ESEA Title II, Part A)**

**Monitoring Response (February 9, 2009)
Colorado Department of Education**

REQUIREMENT	FINDING	CDE RESPONSE
I.1: The State has established appropriate HQT requirements for all teachers who teach core subjects.	N/A - Met requirements	
I.2: The State has established appropriate HQT requirements for <i>special education teachers who teach core academic subjects</i> .	N/A - Met requirements	
I.3: Teachers who are enrolled in approved alternative certification programs AND who have already earned a bachelor's degree AND successfully demonstrated subject matter competence may be counted as highly qualified for a period of 3 years.	N/A - Met requirements	
I.4: The SEA ensures that all teachers hired after the first day of the 2002-2003 school year to teach in Title I programs were highly qualified at the time of hire.	Ensure all teachers in Title I programs are HQ.	<p>CDE has three mechanisms to ensure this requirement is met in 2008-09 and is sustainable: (1) HQ reporting, (2) monitoring and (3) consolidated application,</p> <p>(1) HQ Reporting. Within the HQ reporting, all core content teachers are expected to be HQ. If a core content teacher does not meet the requirements, then the record is diverted to the Highly Qualified Online System (HQOS) where the LEA must submit a plan to get the teacher to HQ status. A new feature has been added to the system, so that reviewers will know when a teacher is located in a Title I school. Reviewers will require a corrective action plan (e.g., teacher must be HQ or reassigned to a non-Title I school within 30 business days). The 2008-09 HQOS will open by the end of February 2009. HQ will be finalized upon close of the data collection in April. Screenshots of the new HQOS have been attached. In the February webinars to train districts and Administrative Units on the use of the system, CDE also communicated that any teachers in Title I programs will have to be HQ within 30 days or the plan will not be approved.</p> <p>(2) Monitoring. Monitoring for this issue will continue. See CDE response on proposed monitoring plan.</p>

REQUIREMENT	FINDING	CDE RESPONSE
I.4: (continued from previous page)		(3) Consolidated Application. Within the Consolidated application, LEAs must report any teacher salaries in the budget. All teachers that are responsible for teaching core content must be HQ. If it is a new hire, then the LEA must provide information on how the teacher is HQ. Approval is not given to the application until this requirement is met. Training for the 2009-10 application occurs in spring 2009 and applications are due at the end of June 2009. Screenshots of the application and table 15 (Assurances of Teachers' HQ Status) were shared during the USDE site visit in December 2008. Screenshots have been included in the attachment.
I.5: The SEA ensures that all teachers paid with Title II, Part A funds for class size reduction are highly qualified.	N/A - Met Requirements	
I.6: The SEA ensures that all LEAs that receive Title I funds notify parents of their right to request and receive information on the qualifications of their children's teachers.	N/A - Met Requirements	
I.7: The SEA ensures that all schools that receive Title I funds notify parents when their children are taught by teachers who are not highly qualified.	N/A - Met Requirements	
II.A.1: The SEA reports annually to the Secretary in the Consolidated Performance Report (CSPR) the number and percentage of classes taught by highly qualified teachers, in the aggregate and in high- and low-poverty schools.	Ensure accurate reporting of HQ teachers, including special education teachers.	The data reporting issues that prevented CO from accurately reporting the HQ status of all core content teachers (including special education teachers) in 2006-07 and earlier were corrected in 2007-08. A copy of Colorado's progress report (dated Oct 27, 2008) has been attached. Since that time, Colorado has moved forward on improving its efforts even more so by creating the Highly Qualified Online System (HQOS) to support the collection of 2008-09 data. Changes in the HQOS will help to further increase the HQ reporting accuracy. This is primarily because the HQOS is now a companion system to the HR collections and occurs simultaneously. This takes the burden off of the districts to "remember" to correct coding errors at a later date. With this new system, the reporting problems in the identified two districts in 2007-08 that were described in that progress report will be avoided. Furthermore, a new edit has been programmed into HR collection that will not allow districts to finalize their data until all core content teachers are HQ or at least have a plan approved by CDE.

REQUIREMENT	FINDING	CDE RESPONSE
II.B.1: The SEA has published an annual report card with the required teacher information.	Ensure accurate reporting of Sped in State Report Card	With the corrections made in 2007-08 on Colorado's collection of HQ special education teacher data, the 2007-08 annual report card will be more accurate and include special education teachers. The data for that annual report card has been compiled; the report is now being formatted at the design center. It should be published within the next month. CDE will notify the USDE upon its availability.
II.B.2: The SEA has ensured that LEAs have published annual report cards with the required teacher information for both the LEA and the schools it serves.	Ensure accurate reporting of sped in Local report cards and the reporting of non-HQ teachers	Beginning with the 2008-2009 data reporting, Colorado will report the percentages of classes not taught by HQT in the school and district profiles (http://www.cde.state.co.us/scripts/districtprofiles/index.asp). This will be available in summer 2009 once the HR data collection closes. Additionally, the guidance for the reporting requirements is being updated to detail that districts and schools must report the percentages of classes taught by non HQT instead (http://www.cde.state.co.us/FedPrograms/NCLB/reportcard.asp). A draft of this guidance has been attached.
III.A.1: The SEA ensures that each LEA that has not met annual measurable objectives for highly qualified teachers for two consecutive years has an improvement plan in place and that the SEA has provided technical assistance to the LEA in formulating the plan.	N/A – Met Requirements	
III.A.2: The SEA enters into an agreement on the use of funds with any LEA that has not made progress toward meeting its annual measurable objectives in meeting the highly qualified teacher challenge for three consecutive years and has also failed to make AYP for three years.	N/A – Met Requirements	
III.B.1: The SEA has a plan in place to ensure that poor and minority students are not taught at higher rates than other students by inexperienced, unqualified or out-of-field teachers.	N/A – Met Requirements	
III.B.2: The SEA ensures that LEA plans include an assurance that through the implementation of various strategies, poor	N/A – Met Requirements	

and minority students are not taught at higher rates than other students by inexperienced, unqualified- or out-of-field teachers.		
REQUIREMENT	FINDING	CDE RESPONSE
IV.A.1: Once hold-harmless provisions are taken into consideration, the SEA allocated additional funds to LEAs using the most recent Census Bureau data found at http://www.census.gov/hhes/www/saipe/district.html .	N/A – Met Requirements	
IV.A.2: The SEA has ensured that LEAs have completed assessments of local needs for professional development.	N/A – Met Requirements	
IV.A.3: To be eligible for Title II, Part A funds, LEAs must “submit an application to the State educational agency at such time, in such manner and containing such information as the State educational agency may reasonably require.”	N/A – Met Requirements	
IV.B.1: The SEA has ensured that LEAs maintain effort.	N/A – Met Requirements	
IV.B.2: The SEA ensures that LEA funds do not supplant other, non-Federal funds.	N/A – Met Requirements	
IV.B.3: The SEA and LEAs are audited, as required by <i>EDGAR</i> §80.26.	N/A – Met Requirements	
IV.B.4: The SEA regularly and systematically monitors LEAs for compliance with Federal statutes and regulations, applicable State rules and policies and the approved sub-grantee application, as required by <i>EDGAR</i> §76.770 and §80.40(a).	Create a plan to regularly and systematically monitor LEAs	Colorado is working with the Southwest Comprehensive Center at West Ed to launch a new online monitoring system call C-FIRS Tracker. This system is being used in Arizona, California, and Utah, and includes Title IIA requirements as well as indicators for other NCLB programs. The system is built around a five-year monitoring cycle that includes desk reviews and onsite reviews. Every LEA is visited at a minimum of every five years, while additional evidence is collected through scheduled desk reviews. Currently, the Tracker system is being tested by several Colorado districts. It will be available for statewide use in August. The State can make screen shots of this system available to the USDE, once the system is fully operational.

IV.B.5: The SEA ensures that LEAs comply with requirements with regards to services to eligible nonpublic schools.	N/A – Met Requirements	
V.1: The SEA ensures that State-level activity funds are expended on allowable activities.	Recommendation	
REQUIREMENT	FINDING	CDE RESPONSE
V.2: The SEA ensures that State-level activity funds do not supplant other, non-Federal funds.	N/A – Met Requirements	
V.3: The SEA complies with requirements with regards to services to eligible nonpublic schools using State-level activity funds.	Consultation regarding use of state level activity funds	<p>CDE has invited a private school representative to participate on its Committee of Practitioners (COP). The COP is a field representative group that meets quarterly to advise the Office of Federal Programs on how to administer NCLB programs, including communication with the field and how to leverage state level dollars. The representative will help CDE determine how to focus its Title IIA state level funds.</p> <p>CDE is in the process of re-examining how it annually collects information from private schools, including contact information. Currently, CDE collects private schools' address and phone numbers. Regardless, CDE can ensure that any future state level professional development activities using Title IIA dollars will be actively made available to teachers in private schools. A good example is the PBS Teacherline Online courses offered to teachers, as well as the tuition reimbursement offered to participants. With the next round of courses, CDE will actively recruit teachers in private schools by sending information directly to the schools. The calendar can be viewed at: http://www.cde.state.co.us/FedPrograms/PDSSP/cal.asp. Note that the 2009 courses have not been finalized yet and will be posted soon.</p>

STATE EDUCATIONAL AGENCY

AREA I: HQT DEFINITIONS AND PROCEDURES

Critical Element I.4: The SEA ensures that all teachers hired after the first day of the 2002-2003 school year to teach in Title I programs were highly qualified at the time of hire.

Citation: §1119(a)(1)

Finding: The State cannot ensure that all teachers hired to teach in Title I programs were highly qualified at the time of hire. Though the State administers proper guidance and monitors the LEAs for compliance with this requirement, in at least two LEAs interviewed, teachers hired to teach in a Title I program were not highly qualified at time of hire.

Further Action Required: Within 30 business days, the State must submit to the Department a written plan with specific procedures and a timeline the State will implement to ensure that all teachers hired for Title I positions are highly qualified. Also, the State must provide the Department with evidence that it is taking corrective actions when LEAs are found to be out of compliance.

AREA II: HQT DATA REPORTING AND VERIFICATION

Critical Element II.A.1: The SEA reports annually to the Secretary in the Consolidated Performance Report (CSPR) the number and percentage of classes taught by highly qualified teachers, in the aggregate and in high- and low-poverty schools.

Citation: §1111(h)(4)(G)

Finding: The State did not submit complete and accurate HQT data to the Department for the 2006-07 school year. The data submitted in the CSPR do not include special education classes in core subjects, as required by statute.

Further Action Required: Although the State has made substantial progress in improving the accuracy of its data on special education classes in core subjects, within 30 business days, the State must submit to the Department a written plan with specific procedures and a timeline that the State will implement to correct deficiencies that remain in the HQT data reported in its CSPR. The State must provide the Department with evidence that it is taking this corrective action.

Critical Element II.B.1: The SEA has published an annual report card with the required teacher information.

Citation: §1111(h)(1)(C)(viii)

Finding: As noted in Critical Element II.A.1, the State did not include complete and accurate data on special education teachers in its 2006-07 HQT data. Thus, data reported on the annual report card are also incorrect.

Further Action Required: Within 30 business days, the State must submit to the Department a written plan with specific procedures and a timeline that the State will implement to correct deficiencies in the HQT data reported in its Annual Report Card. The State must also provide the Department with evidence that it is taking this corrective action.

Critical Element II.B.2: The SEA has ensured that LEAs have published annual report cards with the required teacher information for both the LEA and the schools it serves.

Citation: §1111(h)(2)(B)

Finding: As noted in Critical Element II.A.1, the State did not include complete and accurate data on special education teachers in its 2006-07 HQT data. Thus, data reported on the LEA annual report cards are incorrect. The State also did not ensure that LEA report cards include data on the percentages of classes NOT taught by HQT. The LEA report cards currently do not include this information.

Further Action Required: Within 30 business days, the State must provide the Department with a plan with specific procedures and a timeline that the State will implement to ensure that LEAs' annual report cards include the required teacher information for both the LEAs and the schools they serve.

AREA III: HQT PLANS

No findings.

AREA IV: ADMINISTRATION OF TITLE II, PART A

Critical Element IV.B.4: The SEA regularly and systematically monitors LEAs for compliance with Federal statutes and regulations, applicable State rules and policies and the approved sub-grantee application, as required by EDGAR §76.770 and §80.40(a).

Citation: EDGAR §76.770 and §80.40(a)

Finding: The State is not regularly and systematically monitoring LEAs for compliance with federal statutes and regulations, applicable State rules and policies and the approved subgrantee application. In addition, the State is not regularly monitoring the

fiscal activities of its LEAs and, in the period being monitored, had several LEAs that were required to return funds to the State as a result of making drawdowns in excess of their allocation.

Further Action Required: Within 30 business days, the State must submit to the Department a plan and a timeline ensuring that it will regularly and systematically monitor LEAs for compliance with Title II, Part A requirements, as well as applicable federal and State statutes and regulations.

AREA V: TITLE II, PART A STATE-LEVEL ACTIVITIES

Critical Element V.1: The SEA ensures that State-level activity funds are expended on allowable activities.

Citation: §2113(c)

Recommendation: In the past, the SEA has incurred large carryover balances. It is recommended that the SEA develop written policies that would lead to the more efficient management of the drawdown and carryover of Title II, Part A funds.

Critical Element V.3: The SEA complies with requirements with regards to services to eligible nonpublic schools using State-level activity funds.

Citation: §9501

Finding: The State is not currently complying with requirements with regard to services to eligible nonpublic schools using State-level activity funds.

Further Action Required: Within 30 business days, the State must submit to the Department a plan and a timeline detailing how it will ensure compliance with requirements with regard to services to eligible nonpublic schools using State-level activity funds.