

## Ten Early Lessons Learned From Highly Qualified Teacher Monitoring Reports

The U.S. Department of Education is conducting the second round of monitoring visits for state Highly Qualified Teacher (HQT) requirements and the Improving Teacher Quality State Grants. Because Congress has not yet reauthorized the Elementary and Secondary Education Act (ESEA) of 2001, the law continues as written until further action is taken. The first round of monitoring visits under ESEA occurred between 2004 and 2006, and the second round will conclude in 2010.

The National Comprehensive Center for Teacher Quality reviewed reports from the first 18 visits in the second round of monitoring to identify early lessons for states that will undergo future monitoring visits. The monitoring reports from these visits can be viewed on the Education Department (ED) website at [www.ed.gov/programs/teacherqual/hqt07/index.html](http://www.ed.gov/programs/teacherqual/hqt07/index.html), and the protocols used to guide the visits are available at [www.ed.gov/programs/teacherqual/performance.html](http://www.ed.gov/programs/teacherqual/performance.html). Two key themes emerged from our review of early monitoring reports. The first is that the accuracy of HQT definitions in a state affects all other aspects of implementing the HQT provisions including data reporting and local education agency (LEA) accountability. The second is that HQT plans and equity plans are not static documents. States should view their plans as guides for defining and implementing strategies that address HQT and equitable distribution goals. As such, these plans need to be reviewed, updated, and implemented on an ongoing basis.

The following are ten lessons learned from our review of the early monitoring visits:

- 1. Hold LEAs accountable if they do not meet annual measurable objectives.** LEAs that have not met HQT annual measurable objectives for two consecutive years are required to develop and implement an improvement plan (see Section 2141 of ESEA: [www.ed.gov/policy/elsec/leg/esea02/pg24.html#sec2141](http://www.ed.gov/policy/elsec/leg/esea02/pg24.html#sec2141)). States are expected to assist these LEAs in formulating improvement plans. Also, states are expected to have an agreement in place regarding the use of funds for LEAs that have not met annual measurable objectives and failed to make adequate yearly progress for three consecutive years. During monitoring visits, states are asked to provide evidence that improvement plans are in place and that the state provided technical assistance to LEAs for implementing their plans. A few states received a finding related to the monitoring of improvement plans and for not assisting LEAs with their plans. ED also cited other states for not implementing monitoring agreements that could eventually result in the state education agency (SEA) withholding Title II dollars from LEAs that had not met HQT annual measurable objectives for three consecutive years. Because of the HQT definition and data verification issues, some states were unable to accurately determine whether or not LEAs had met the annual measurable goals, and states thus were unable to hold the LEAs accountable.

**Tennessee** created a comprehensive data system that goes beyond the required data elements and allows for quick and complete data analysis. The SEA can establish and track annual measurable objectives for each LEA. The SEA also uses the system to drive planning and funding decisions.

**Washington** developed a technical assistance process to meet the requirements of Section 2141 (a) and (c) and worked with LEAs to enter into the required agreements. The LEAs interviewed during the state’s monitoring visit, all of which had recently entered into required 2141 (c) agreements, noted that the process was clear and ultimately helped them make better educational decisions. Washington provides guidance on all teacher quality provisions of ESEA online at [www.k12.wa.us/TitleIIA/HighlyQualifiedTeachers.aspx](http://www.k12.wa.us/TitleIIA/HighlyQualifiedTeachers.aspx) and guidance in working with LEAs on the provisions specified in Section 2141 at [www.k12.wa.us/TitleIIA/pubdocs/GuidanceHQTImprovementAccountabilityPlan.pdf](http://www.k12.wa.us/TitleIIA/pubdocs/GuidanceHQTImprovementAccountabilityPlan.pdf)

**Oregon** originally received a finding during its monitoring visit regarding the requirements outlined in Section 2141 of ESEA. Since then, Oregon created, with the assistance of the Northwest Regional Comprehensive Center, a set of guidance documents concerning the teacher quality provisions of ESEA. These documents are available at [www.ode.state.or.us/search/page/?id=2219](http://www.ode.state.or.us/search/page/?id=2219) and include specific guidance on the 2141 agreements.

- 2. Ensure that HQT requirements for alternatively certified teachers are accurate.** Alternatively certified teachers are not considered highly qualified until they have demonstrated subject-matter competence. Some states counted teachers in alternate route programs as highly qualified before they had demonstrated subject competence. Although these teachers have three years to obtain full certification, ED does not consider alternatively certified teachers as highly qualified unless they have demonstrated subject competence.
- 3. Review your HQT requirements for special education teachers.** States should review their process for defining highly qualified special education teachers to ensure compliance with ESEA and Individuals with Disabilities Education (IDEA) Act requirements. Under ESEA, any special education teacher who is the teacher of record in a core subject area must meet HQT criteria, which includes demonstrating subject matter knowledge for each subject taught. One state failed to include any data on special education teachers in its reporting. Other states received citations for determining HQT status for special education teachers based on their students’ instructional levels rather than by whether or not the students are assessed to alternate standards. ED noted that only teachers who exclusively teach students assessed against alternative achievement standards can demonstrate subject-matter competence at a level lower than their students’ designated grade.
- 4. Confirm procedures for verifying HQT data.** Now that states have systems in place to collect and report HQT data, ED has increased its focus on the quality of these data. During monitoring visits, states are asked about their procedures for reviewing and validating HQT data. Many states received findings because of inadequate procedures for

monitoring data quality. One state only reviewed data for LEAs that did not meet 100 percent of HQT goals, and other states did not have a method to audit their HQT data. States should make sure they have procedures to verify HQT data in a “comprehensive and timely fashion.” In the monitoring reports, ED recommends creating review procedures, including a random audit of HQT records, systematic monitoring of HQT data from LEAs, or spot-checks of HQT data.

**Delaware** implemented a new, cohesive, and thorough monitoring and evaluation system. The state continued to provide traditional desk audits and on-site reviews and also moved toward using risk analysis and needs-based monitoring. Using various data elements, including HQT information, Delaware hopes to move to an “every district, every year” monitoring schedule by examining data and correcting compliance issues early and using on-site review as more of a technical assistance tool rather than a monitoring tool.

**Maine** regularly monitors its LEAs for compliance with ESEA regulations and has developed comprehensive monitoring materials to help the LEAs prepare for visits. These materials include *NCLB: A Visit Preparation Guide*, a prereview report, a monitoring interviewing guide, a chart outlining each Title’s monitoring needs and assigned team member, and a matrix for developing an agenda.

**Michigan** developed and implemented the Michigan Technical Assistance Project (MiTAP) that provided monitoring and intensive technical assistance to districts on the HQT provision and expectations. The state trained MiTAP consultants who visited more than 500 districts in the past year. The visits were prioritized based on the most recent HQT data available for each district. MiTAP consultants verified the HQT data reported by each district.

**New Mexico** and **Oregon** both established procedures to verify the quality and accuracy of HQT data through validation and spot-checking of the data reported by the LEAs, including high objective uniform state standard of evaluation (HOUSSE) records and documentation.

**Oregon** also created a new data system that links the certification and licensure data with assignment and HQT data and implemented a statewide course-coding system. This new system resulted in improved data accuracy and reporting and reflects the extensive collaboration between the state department of education and the Teacher Standards and Practices Commission.

**5. Pay consistent attention to whether or not LEAs hire non-HQTs for Title I positions.**

States are expected to monitor whether LEAs hire teachers who do not meet HQT requirements and to take corrective action for any LEAs that hire non-HQTs for Title I positions. ED cited one state for not applying “uniform corrective action” when LEAs are out of compliance and reported that another state did not know that an LEA had hired non-HQTs for Title I positions. Another state received a finding by ED for allowing an LEA to hire non-HQTs who had a plan in place to become highly qualified.

**New Mexico** encouraged its LEAs to use their funds strategically to address their specific needs. For example, the state suggests that LEAs use Title II, Part A funds for class-size reduction only when the LEA has 100 percent of its teachers in teaching assignments for which they are highly qualified.

- 6. Obtain evidence that LEAs notify parents of children taught by non-HQTs.** Most of the states that received findings concerning this responsibility did not have processes in place to ensure that LEAs notified parents whose children were being taught by teachers not meeting HQT requirements. Even states that have high HQT rates should ensure that LEAs with non-HQTs notify parents. The protocol for ED's monitoring visits suggests that appropriate evidence for this requirement includes assurances from LEAs, a sample of notification letters, evidence of monitoring, and corrective action plans for LEAs that have not notified parents.
- 7. Ensure that annual report cards include all required HQT data elements.** States need to ensure that their annual report cards include all appropriate data elements. A few of the monitored states failed to report the percentage of classes not taught by HQTs and the percentage of teachers with emergency or provisional certification, and many did not disaggregate their HQT data for high- and low-poverty schools. ED emphasized in most reports that states should identify on their report cards the percentage of classes not taught by HQTs. In most instances, problems with annual report cards stemmed from issues with how states defined HQT requirements for elementary and secondary teachers, including special educators. States should recognize that errors in state HQT requirements for general education, special education, or alternatively certified teachers affect the accuracy of data reported on their report cards.

**California** provides technical assistance to districts regarding publishing their annual report cards with the required teacher information. The state provides all districts with an electronic report card template, complete with teacher data. The state also includes these templates in the five most commonly spoken languages in California and will translate local report cards into a total of 17 languages.

**Michigan** developed and implemented the Michigan Technical Assistance Project (MiTAP) to provide monitoring and intensive technical assistance to districts on the HQT provisions. In addition to verifying the HQT data reported by each district, the MiTAP consultants assisted districts in analyzing their needs regarding HQT and in developing an action plan for meeting HQT requirements.

- 8. Update your HQT plan and equity plan.** States should treat their HQT and equity plans as living documents that need to be updated based on changing conditions and new data. In addition, states should share updated versions of their plans with ED. In fact, ED required that two states update and resubmit their equity plans within 30 days of the monitoring visits. Because of a change in the structure and organization of its LEAs, one state needed to update its HQT and equity plans. More than one state was asked to revise its equity plans based on the review of more current (2006–07) HQT data. In addition,

ED recommended that states revise their HQT plans on a regular basis. When revising their plans, states should update deadlines for HQT activities and consider how the findings from the new data affect their approach to HQT issues. ED also recommended to one state that staff from teacher quality and school improvement offices collaborate more effectively. This approach may improve the assistance provided to LEAs in developing HQT plans.

**Mississippi** provided a thorough and thoughtful approach to analyzing the equitable assignment of teachers in its report titled *An Analysis of Teacher Quality in Core Academic Subjects as Defined by the No Child Left Behind Act of 2001: Selected Data From 2005/2006 and 2006/2007*.

**Pennsylvania** disseminated information throughout the state about equitable teacher distribution through the creation of a PowerPoint presentation that provided information about the purpose, components, importance, implementation, and monitoring of the equitable teacher distribution plan and presented this information to a variety of audiences in the state.

- 9. Implement strategies in your equity plan to address equitable distribution.** The early monitoring visits have made it clear that simply having an equity plan in place is not sufficient. ESEA requires that the SEA measure progress on the strategies in the plan and report on the strategies included in the equity plan. For example, one state received a commendation for using its equitable distribution plan to encourage districts to review equitable distribution data. The monitoring reports suggest that ED expects states to have a plan for how they will implement specific strategies to address HQT equity issues. States also should make sure that LEAs are implementing strategies to address equity issues. In addition, states need to go beyond just having assurances in place to make sure that LEAs are implementing effective strategies for addressing these issues.

**California** provided written materials and guidance on creating a district-level equity plan. Specifically, the state created a “toolkit” that includes guidance on how to use data and questions to ask when thinking through the creation of an equity plan specific to a district’s needs. The “toolkit” also includes current relevant research.

**Rhode Island** used its equitable distribution plan to encourage districts to conduct in-depth review of gap and trend data to ensure that students from low-income families and minority students are not taught at higher rates than other students by inexperienced, unqualified, or out-of-field teachers within and across districts.

**Wyoming** tied its Title II, Part A LEA funding to the submission of a state-required LEA HQT plan, which resulted in significant attention to the HQT requirements by each LEA.

**10. Establish a plan and timeline for resolving unmet HQT requirements.** States that do not meet a requirement during their monitoring visit are asked to submit a plan and timeline describing how the state will address the issue(s). Although states with upcoming visits should strive to resolve any unmet HQT requirements before the visit, a state that is unable to correct an issue before its monitoring visit should develop a plan and timeline for how the requirement will be met. By creating a plan of action, a state demonstrates its awareness of the issue and provides evidence of how it will be addressed. States not meeting this requirement in advance of the monitoring visit will be asked to develop a plan and timeline to submit to ED within 30 days.