



south dakota
DEPARTMENT OF EDUCATION
Learning. Leadership. Service.

School Improvement Grants LEA (District) Application

**Section 1003(g) of the
Elementary and Secondary Education Act**

CFDA Numbers: 84.377A; 84.388A



U.S. Department of Education
Washington, D.C. 20202
OMB Number: 1810-0682

Due Date

May 2, 2011

South Dakota Department of Education

MacKay Office Building, Title I Office
800 Governors Drive
Pierre, SD 57501

Grant Period Ends

June 30, 2014

FY 2010

School Improvement Grant (SIG)

Cover page

Legal Name of Applicant: Shannon County School District #65001	Applicant's Mailing Address: P. O. Box 109 Batesland, SD 57716
LEA Contact for the School Improvement Grant Name: Vickie Grant Position and Office: Director of School Improvement Contact's Mailing Address: P. O. Box 109 Batesland, SD 57716	Telephone: 605-288-1921 Fax: 605-2881814 Email address: vgrant@shannon.ws
LEA Superintendent (Printed Name): Richard Zephier, Ph.D, MBA	Telephone: 605-288-1921
I certify that the program person identified above is authorized to act on behalf of the institution with regard to the School Improvement Grants. X _____ Signature of the LEA Superintendent	Date: May 2, 2011
The LEA, through its authorized representative, agrees to comply with all requirements applicable to the School Improvement Grants program, including the assurances contained herein and the conditions that apply to any waivers that the State receives through this application. School Board President Name & Signature: Angie Eagle Bull Alternative School Principal Name & Signature: Vickie Grant Alternative School Building Manager Name & Signature: Darrell Eagle Bull	

ASSURANCES AND CERTIFICATION STATEMENT: The above named applicant assures the South Dakota Department of Education that these projects will be administered in compliance with the assurances contained in its current consolidated application for the Title I part A program, with state and federal laws and regulations applicable to the use of these funds, that the information contained in this application is accurate and complete.

Name of Authorized Representative (Type or Print): Richard Zephier

Original Signature of Authorized Representative: _____

Date: May 2, 2011

SD Department of Education use only	
Date Received:	_____ Signature of authorized SD DOE staff person

Guidelines

Purpose of Grant

The School Improvement Grants (SIG) program is authorized by section 1003(g) of the Elementary and Secondary Education Act of 1965 (ESEA). Under section 1003(g)(1) of the ESEA, the Secretary must “award grants to States to enable the States to provide subgrants to local educational agencies for the purpose of providing assistance for school improvement consistent with section 1116.” From a grant received pursuant to that provision, a State educational agency (SEA) must subgrant at least 95 percent of the funds it receives to its local educational agencies (LEAs) for school improvement activities. In awarding such subgrants, an SEA must “give priority to the local educational agencies with the lowest-achieving schools that demonstrate — (A) the greatest need for such funds; and (B) the strongest commitment to ensuring that such funds are used to provide adequate resources to enable the lowest-achieving schools to meet the goals under school and local educational improvement, corrective action, and restructuring plans under section 1116.” The regulatory requirements expand upon these provisions, further defining LEAs with the “greatest need” for SIG funds and the “strongest commitment” to ensuring that such funds are used to raise substantially student achievement in the persistently lowest-achieving schools in the State.

The Consolidated Appropriations Act, 2010, which was signed into law by President Obama on December 16, 2009, included two critical changes to the SIG program. First, the Consolidated Appropriations Act, 2010 allows SEAs and LEAs to use SIG funds to serve certain “newly eligible” schools (*i.e.*, certain low-achieving schools that are not Title I schools in improvement, corrective action, or restructuring). Second, the law increases the amount that an SEA may

award for each school participating in the SIG program from \$50,000 annually to \$2 million annually.

Clarification of Available School Improvement Funds

There are two opportunities for additional funding for Title I schools in improvement status. These funds are distributed according to statute in Title I Part A 1003(a) and 1003(g).

The funds available under School Improvement 1003(a) - Formula grants have been and will continue to be allocated on a formula basis to all districts with Title I schools in improvement. These funds are to be used at each Title I school in school improvement based on the allocation for that school.

School Improvement Grants 1003(g) are additional funds available to districts with Tier I, II, or III schools as identified as Persistently Lowest Achieving (PLA) schools. Districts may apply for these grants on behalf of Title I school in improvement, corrective action, restructuring, or alternative governance designated as Tier I schools. The remaining Title I schools in improvement status, listed as Tier III schools, may be served with SIG funds after priority schools are served. Districts may also apply for Tier II schools which are high schools eligible for, but not receiving Title I funds.

Eligible Applicants

An LEA that receives Title I, Part A funds and that has one or more Tier I, Tier II, or Tier III schools may apply for a SIG grant. Note that an LEA that is in improvement but that does not have any Tier I, Tier II, or Tier III schools is not eligible to receive SIG funds.

Allocations

The minimum award for each school will be \$50,000 per school for each of the three years (unless a shorter time period is needed). An LEAs maximum award will be no more than \$2 million per year for a three year period for each Tier I, II, or III school served.

If an SEA does not have sufficient SIG funds to support fully and effectively each school for which its LEAs have applied throughout the period of availability, an SEA must give priority to LEAs seeking to fund Tier I or Tier II schools.

Based on Need and Commitment

In addition to the objective measures used to determine need for the 1003(a) funds (poverty, enrollment, and level of need), each DISTRICT with eligible schools applying for funds under section SIG 1003(g) must demonstrate the need for the additional school improvement funds and commitment to carry out the requirements.

Greatest need: An LEA with the greatest need for a School Improvement Grant must have one or more schools in Tier I, II, or III.

Strongest Commitment: An LEA with the strongest commitment is an LEA that agrees to implement, and demonstrates the capacity to implement fully and effectively, one of the following

rigorous interventions in each Tier I and Tier II school that the LEA commits to serve: Turnaround, Restart, School Closure, or Transformational Models.

Four Models

Districts with Tier I or II schools must select one of the following models to implement.

Turnaround model: The LEA replaces the principal (although the LEA may retain a recently hired principal where a turnaround, restart, or transformation was instituted in past two years) and rehiring no more than 50% of the staff; gives greater principal autonomy; implements other prescribed and recommended strategies;

Restart model: The LEA converts or closes and reopens a school under a charter school operator, charter management organization, or education management organization;

School closure: The LEA closes the school and enrolls the students in other schools in the LEA that are higher achieving; or

Transformation model: The LEA replaces the principal (although the LEA may retain a recently hired principal where a turnaround, restart, or transformation was instituted in past two years); implements a rigorous staff evaluation and development system; rewards staff who increase student achievement and/or graduation rates and removes staff who have not improved after ample opportunity; institutes comprehensive instructional reform; increases learning time and applies community-oriented school strategies; and provides greater operational flexibility and support for the school.

Conditions of Eligibility

SDDOE will consider applications from districts with Persistently Lowest Achieving (PLA) Tier I, II, or III schools.

Waiver to Implement a Schoolwide Program

Requests for waivers to enable a Tier I or Tier II Title I participating school operating a targeted assistance program to operate a schoolwide program so it can implement a turnaround, restart, school closure, or transformational model should be made directly to the United States Department of Education. Such a waiver is necessary because a school operating a targeted assistance program may only provide Title I services to students who are most at risk of failing to meet State's student academic achievement standards; it may not provide services for the school as a whole. In order to operate a schoolwide program, a school must meet the 40 percent poverty eligibility threshold.

The LEA must indicate for which schools it will implement the waiver. The waiver must be published for public comment prior to submission.

Budget and Accounting

The SIG 1003(g) awards must be used to **supplement** the level of funds available for the education of children in these schools. Therefore, these funds can supplement, but they **cannot be used to replace existing funding or services.**

The School Improvement Grant 1003(g) funds *must be tracked separately* from the Title I, Part A Basic Grant and the other Title I School Improvement funds distributed by formula under Section 1003(a). School Improvement funds are awarded for individual schools, therefore these funds must be accounted for at the individual school level.

Districts are to receipt improvement funds in the Title I revenue account and track each award separately by using a sub account number (operational unit and/or sub-object) for each Title I program. Expenditures for the School Improvement Grant 1003(g) funds should be tracked using the same sub account identifier.

Duration

Grant Periods:

Project Year 1: July 1, 2011 – June 30, 2012

Project Year 2: July 1, 2012 – June 30, 2013

Project Year 3: July 1, 2013 – June 30, 2014

These funds are contingent on renewed federal funding.

The SEA must renew the LEA's SIG grant with respect to each Tier I or Tier II school that meets the annual student achievement goals established by the LEA and makes progress on the leading indicators. The SEA may renew the LEA's SIG grant with respect to a school that does not meet its annual goals as it has discretion to examine factors such as the school's progress on the leading indicators or the fidelity with which it is implementing the model in deciding whether to renew the LEA's SIG grant. For a grant to be renewed with respect to a Tier III school, the school must meet the goals established by the LEA and approved by the SEA, or make progress toward meeting those goals. See section II.C(a)(i)-(ii) of the final requirements. If the SEA determines that one or more of an LEA's schools do not warrant renewed funding, the SEA may continue to award the LEA SIG funds for other eligible schools. The SEA would reduce the LEA's grant, however, by the amount allocated for the schools for which funding is not being renewed.

The Application Process

Review and Approval Process: LEA applications will undergo review by a panel with facilitation. The panel will consist of members of the Committee of Practitioners and the School Support Team. Additional panel members will be recruited with expertise in curriculum, administration, and teacher evaluation. A rubric will be used to determine if LEA applications meet the

requirements of the grant and warrant approval. Each element will be scored based on the following scoring rubric:

Strong: Responses were thorough with sufficient detail

Moderate: Responses were satisfactory needing minor clarifications

Limited or None: Responses were attempted but lacking specificity or no response was given

The complete scoring rubric is attached at the end of the document.

The department will notify the LEAs of the day their application will be reviewed and will be asked to be available for a conference call if the panel has questions about their application. This will be an opportunity for districts to clarify the intent of their applications. Final scoring of the rubric and recommendations to the department will conclude the panel review process. LEAs with applications that are promising but do not fully meet each requirement will be contacted by the department for technical assistance in bringing the application into full compliance. LEA applications will not be approved unless all requirements are fully met.

Timeline: Upon approval of the State Application, the LEAs will be given a copy of the draft application package. A Live Meeting will be held at that time to go over the application and grant requirements. Districts will be asked to indicate their intent to apply for Tier I and II schools. Tier III applications will be sent out if warranted, based upon the number of Tier I and II schools LEAs intend to commit to serve and the amount of funding available. Technical assistance will be provided by department staff at the request of the district. LEA applications must be submitted within 30 working days. Awards are expected to be announced within three weeks after submission. Districts receiving grant awards may begin pre-implementation immediately, but no later than the first contract day for the 2011-2012 school year.

Applications must be submitted electronically by email. The application may be single spaced with appropriate spacing between sections, with font size of 12 or greater. Electronic submissions must be sent to Beth Schiltz. A follow-up paper copy of the cover page signed by the authorized representative and the school principal must be sent.

Technical Assistance

A Live Meeting will be held to provide LEAs with the LEA application and School Sections. An over view of PLA identification, SIG requirements, the four intervention models, and application procedures will be provided.

SEA staff are available to provide technical assistance at the request of the district. School Support Team members will also be assigned to help districts as they design their SIG applications.

Contact Information

For grant application questions:

Dr. Kristine Harms (773-6509)

Beth Schiltz (773-4716)

Kristine.Harms@state.sd.us

Beth.Schiltz@state.sd.us

For fiscal questions:

Rob Huffman (773-4600)

Paul Schreiner (773-7108)

Robyn.Huffman@state.sd.us

Paul.Schreiner@state.sd.us

LEA APPLICATION REQUIREMENTS

A. SCHOOLS TO BE SERVED: An LEA must include the following information with respect to the schools it will serve with a School Improvement Grant.

An LEA must identify each Tier I, Tier II, and Tier III school the LEA commits to serve and identify the model that the LEA will use in each Tier I and Tier II school.

SCHOOL NAME	NCES ID #	TIER I	TIER II	TIER III	INTERVENTION (TIER I AND II ONLY)			
					turnaround	restart	closure	transformation
Shannon County Alternative		X						X

B. DESCRIPTIVE INFORMATION: An LEA must include the following information in its application for a School Improvement Grant.

Specific information for each Tier I, II, and III school that the district applies to serve will be addressed in each school level section. Please answer these questions **from a district perspective**, taking into consideration each of the district’s Tier I, II, and III schools.

(1) (Tier I, II, & III) The LEA has analyzed the needs of each school and selected an intervention for each school. **(Must be at the district level)**

- a. List the members and positions of the committee that conducted the needs assessment and determined the outcome. *Your answer must include the following: A list of the names of the members of the district committee and the position within the district that each person is representing. The committee must include a broad range of stakeholders including administrators, teachers, program directors, community members, and parents.*

The Corrective Action Leadership Team for Shannon County School District met on April 6, 2010 to conduct the needs assessment and determine the intervention for each school. Members of the team who were present include Dan Elwood, superintendent; Vickie Grant, school improvement director; Maurice Twiss, federal programs director/community member; Robert Two Crow, Lakota studies director/community member; Darrell Eagle Bull, Dean of Students/community member, Alternative School; Monica Whirlwind Horse,

principal/community member, Rockyford Upper; Connie Rous, teacher, Batesland Elementary; Illa Brings Him Back, paraprofessional/ community member, Wolf Creek School; Liz Swallow, paraprofessional/community member, Red Shirt School; Natalie Hand, parent, Wolf Creek School; Mark Donovan, grandparent, Wolf Creek School; Bob Rose, technical adviser; and Sandra Gaspar, consultant.

The Alternative School staff, parents, community, and students were avid supporters of the 2009-2010 proposal and have continued assessing needs in hopes of an opportunity to apply in 2010-2011. When the Director of Student Support, was advised on March 18, 2011 of the possibility of applying, he met with all stakeholders and the decision was made ask the district to apply. Mr. Eagle Bull and Vickie Grant, Director of School Improvement participated in the 1003(g) Application Webinar on March 24, 2011 and the Senior Leadership Team consisting of Richard Zephier, superintendent/community member; Coy Sasse, business manager/community member; Maurice Twiss, federal programs director/community member; Vickie Grant, school improvement director, Robert Two Crow, Lakota studies director/community member; Beverly Bertram, SCEA President, Dana Christensen, technology director; Dennis Brewer, transportation director/community member; Terry Albers, human resources director/community member and principals, Monica Whirlwind Horse, Robert Hall, Larry Larson, Steve Selchert, Melvin Sierra, Barbara Ice, and Connie Kaltenbach discussed and endorsed moving forward with the Alternative School application on 3/28/2011. Addendum #1 is a letter from Darrell Eagle Bull and list of staff, students and parents describing the school's continuous efforts to assess needs and plan towards becoming a Transformation School.

- b. Indicate the data sources that were analyzed as part of the district's comprehensive needs assessment designed for the purpose of the SIG application. *Your answer must address data within the four lenses of the Data RetreatSM process: Student, Professional Practices, Programs & Structures, and Family & Community Data. Include an evaluation of current practices and programs as required in the third lens of data review. If any of the schools involved have had a school level audit based on the District Audit Tool published by CCSO, the results must be included in the data analysis.*

Student: DSTEP data in reading and mathematics (2003 to 2010)

Local CBM data in reading and mathematics (2003 to 2011)

District Audit, 2006 and 2009

Teacher: Current year in-service schedules

Anecdotal and formal teacher feedback regarding professional development

District Audit, 2006 and 2009

Program: Mathematics Program Audit conducted by TIE, 2011

Literacy Program Audit conducted by CORE, 2011

District Audit, 2006 and 2009

Community and parent:

Parent Survey, academics component, 2010 & 2011

District Audit, 2006 and 2009

- c. Describe the process used to complete the district's comprehensive needs assessment (CNA) conducted for the purpose of the SIG application. *Your answer must include the following:*

WHEN the comprehensive needs assessment was conducted, give date (must be completed between application availability and application submission); WHO was involved with the analysis of the data; and HOW the comprehensive needs assessment was accomplished.

As described previously, even though the Alternative School did not receive a SIG Grant in 2010, they continued to discuss that being a Transformation School would look like; therefore, the information from the 2010 CNA remains relevant. A comprehensive needs assessment was conducted by the District Corrective Action Leadership Team in the Board Room in Batesland on April 6, 2010. Ten of the 12 regular members of the Corrective Action Leadership Team participated in the data analysis. In addition one parent, one grandparent, and the Dean of Students at the Alternative School (a Persistently Lowest Achieving School) joined the group for the data review/analysis and subsequent discussion. In keeping with the academic goal of the Shannon County School District Improvement Plan, the primary focus of the data analysis was student performance in reading and mathematics, both on the DSTEP (from 2003 through 2009) and on district-administered Curriculum Based Measures (CBMs) in reading and mathematics (2003 through 2010). The School Improvement coordinator presented student achievement, teacher, program and community/parent data via a slide show presentation and hand-outs. Members of the group discussed patterns/trends and generated a list of planning considerations. In addition, the CATeam reviewed a draft professional development plan (that was based on an earlier analysis of data) and discussed ways in which the district SIG proposal and the professional development plan could be merged. Meeting participants worked in triads to note strengths and weaknesses in the data and in the professional development plan. They provided oral and written feedback to the grant planning committee.

A comprehensive needs assessment was conducted during a Strategic Planning Session at the Radisson Hotel in Rapid City on March 18-19, 2011. All members of the Senior Leadership Team along with school board members, Todd O'Bryan, Tom Conroy, Bryan Brewer, and Angie Eagle Bull participated. The School Improvement Director presented student achievement, teacher, program and community/parent data via a slide show presentation and hand-outs. Members of the group discussed patterns/trends and generated a list of planning considerations. Since the SIG announcement had just been released, principals and Mr. Eagle Bull (representing the Alternative School) were able to utilize this forum to inform the SIG proposal. Meeting participants worked in triads to note strengths and weaknesses in the data and within the school system. The draft Strategic Plan was distributed in mid-April and in part informs this proposal.

- d. Broadly describe the results of that review (specifics for each school will be outlined in the school sections). *Summarize the results of the CNA for each school.*

The team that conducted the Comprehensive Needs Assessment recognized that the mathematics achievement of Shannon County students overall remains lower than achievement in literacy/reading. Although 38% of district's students are proficient in reading, only 33% are proficient in mathematics. Data disaggregated by building showed a similar pattern: mathematics achievement in ALL Shannon County Schools remains lower than achievement in reading. Team members were especially interested in a chart that compared reading and mathematics DSTEP performance in each school according to the number of test items answered correctly, on average. Students in the various schools needed to answer from .9 (Batesland) to 8.3 (Shannon County

Alternative School) more questions correctly on the reading test to achieve proficiency. In mathematics, these numbers ranged from 5.7 to 15.1 more questions correctly to achieve proficiency. Results for Shannon County Alternative School are the lowest among all schools in the district. No Alternative School students are proficient in mathematics; only 16% are proficient in reading. These results are not surprising, since the primary focus of professional development, improvement in instruction, coaching and assessment has been on literacy since 2002. Only within the past four years has the district selected and begun to implement a reformed mathematics program (Investigations) in grades K-5. The district audit revealed that professional development has been inadequate; as a result, implementation of the new mathematics program with fidelity has been compromised. The team agreed, via consensus, that improving mathematics achievement should be the focus during the SIG period, but that efforts to continue support for literacy should not be diminished.

Since Shannon County Alternative School is a Tier I school, the team also considered additional data for this school separately. Of particular concern were data that showed the following: of the 54 students who enrolled in the Alternative School, only 21 students have been in the program for what is considered a full academic year (FAY). This attrition rate of over 60% has serious implications when it comes to delivering a coherent and properly sequenced instructional program. Given the alternatives, the team agreed that the Transformation Model was most appropriate for the Shannon County Alternative School.

- e. List the strengths and weaknesses for each school based on the results of the comprehensive needs assessment. *These should be brief statements or phrases. Prioritize the areas that will be addressed with SIG funds.*

Shannon County Alternative School

Strengths: Staff/student relationships are strong; many staff members are also community members with a deep understanding of local culture

The Student/staff ratio is low—about 5 to 1

In 2009, the school made AYP in reading

As indicated in a comprehensive parent survey, parents of Alternative School students support the SCSD academic program

The Alternative School has an active Building Leadership Team that regularly addresses issues of teaching and learning.

Recruitment/retention incentives and incentives to increase student performance are already in place.

Weaknesses (Needs): Mathematics achievement is very low (no students are proficient)

Historically, professional development has been inadequate

Since the district currently has only one reading coach and one math coach, instructional coaching specific to the Alternative School has been virtually non-existent

There is a great deal of student transience: only 21 of the school's 54 students have been in the program since the beginning of the school year.

Priority areas: Improve achievement in mathematics

Improve instruction through a comprehensive professional development program in mathematics and assignment of a full-time instructional coach at the Alternative School

Address issues of student mobility through curriculum enhancements which include technology-based modules.

- f. Provide the rationale the district used to determine which schools to serve with SIG funds and which schools not to serve. *Must address each Tier I and II school first, and then address each of the district's Tier III schools, if applicable.*

Since the Shannon County Alternative School is a Tier I school, the district is committed to serving this school as its top priority. Students served in the alternative program are all high-risk students who struggle the most to be successful in school; they are consistently the lowest-achieving students in the district. Most alternative students have problems dealing with school authority. They display low self-esteem, misconduct in the classrooms and are generally disciplined more than their classmates. A number of Alternative School students are pregnant and parenting teens. The Pine Ridge Reservation is a high poverty area with unemployment hovering around 80%. All of these conditions put Shannon County Alternative students at highest risk for dropping out of school, alcohol/drug abuse, and suicide. These are the students who need the most instructional, emotional and social support.

- (2)** (Tier I & II) The LEA has the capacity to use school improvement funds to provide adequate resources and related support to each Tier I and Tier II school identified in the LEA's application in order to implement, fully and effectively, the required activities of the school intervention model it has selected.

- a. Describe the LEA's capacity to adequately serve the schools identified in the application. *What capacity does the district have to execute and support a turnaround or transformational model?*

The district has the personnel, the technical infrastructure, and a history of participation in the South Dakota Incentives+ project to jumpstart its efforts to implement the Transformation Model in the Shannon County Alternative School. As a result of its participation in SDI+, the district has already linked growth in student performance with monetary incentives for paraprofessionals, teachers and principals. In addition, SDI+ has assisted the district in implementing strategies to recruit, place and retain highly-qualified and highly-effective staff.

Will the district contract with any person or organization to assist with the implementation of the turnaround or transformational model?

The district will contract with Technology and Innovation in Education (TIE) to assist with implementation of the Transformation Model in Shannon County Alternative School. TIE is a high-capacity, intermediate service agency that specializes in teacher and school leader development, school innovation, program evaluation, and data-driven school improvement. In particular, TIE will assist the district in creating a sophisticated evaluation system that includes a process for removing staff who are not effective. Additionally, the Consortium on Reading Excellence (CORE) provides RtI support for the district and as an approved Turnaround and Transformation can further support the Alternative School's implementation efforts.

What resources does the district have in terms of staffing, funding, support, partnerships, etc. that will assist the district in successfully implementing the chosen interventions?

Shannon County School District has a progressive superintendent and a Board of Education who are willing to abandon the status quo in favor of new ideas that show promise for improving teaching and learning. They are committed to significantly increasing both student instructional time and staff professional development time. The district has one of the lowest teacher/student ratios in the state of South Dakota and will employ a total of 10 instructional coaches

(literacy, mathematics and Response to Intervention--RTI) beginning with the 2010-2011 school year. As a part of the SDI+ project, each school has created a Building Leadership Team that has received more than 50 hours of specialized training in data-driven decision making, effective instructional strategies, effective teaming, and school leadership. In addition, the district has created a sophisticated, web-based system to guide instruction and assessment. The system aligns the district's literacy and mathematics programs with state standards and provides teachers with pacing guides to ensure that students will have a guaranteed and viable curriculum. The district also has a comprehensive formative and summative assessment system, and teachers have immediate access to a wealth of student achievement data to help guide their instruction.

Differentiate what has already taken place and detailed plans for the future.

The district has already made significant improvements in curriculum (comprehensive literacy and reformed mathematics), instruction and assessment. The district has adopted a philosophy of continuous improvement, however. Curriculum groups in all the content areas meet each summer to further refine the web-based resources, discuss ways to improve teaching and learning.

- b. Describe district administrative oversight. *Your answer must include who from the district will provide oversight of the SIG and how that will be accomplished.*

The district's Leadership Team, chaired by the superintendent, will provide oversight of the School Improvement Grant. The team is a 12-member group that meets monthly and includes central office staff, principals, teachers, paraprofessionals, parents/community members, and a board member. The team will receive monthly progress reports, will annually benchmark goals and objectives, and will make recommendations for continuous improvement.

- (3)** (Tier I) If the LEA is not applying to serve each Tier I school, the LEA must explain why it lacks capacity to serve each Tier I school. *The LEA must indicate the barriers or reasons why it lacks the capacity to serve all Tier I schools. Examples might be funding, minimum staffing for oversight, inability to close schools, geography or rural nature of district, lack of charter schools in the state, lack of qualified principals applying over the past years, district improvement, school improvement, multiple requirements to address.*

Shannon County School District has only one Tier I school and is applying to serve that school.

- (4)** (Tier I, II & III) The LEA must describe actions it has taken, or will take.

- a. Design and implement interventions consistent with the final requirements. *Districts must describe what has been done to this point to design the interventions described in the school level sections. Plans for future action must be indicated. Broadly address all of the schools the district has committed to serve. School level sections will contain specific actions and timelines the district will meet in implementing the interventions for each school.*

In reference to the Transformational Model to be applied to SCSD's Alternative School, the district has already been engaged in comprehensive efforts to increase teacher and school leader effectiveness in all schools through its participation in the SDI+ project. Through SDI+, the district has begun to create and implement a performance evaluation system that links teacher pay to student performance in all schools. In addition, the district has created a professional learning community structure in all schools.

A major component of this plan for all schools is the implementation of a comprehensive, job-embedded professional development program to improve teaching and learning in mathematics and to integrate Lakota studies into the teaching of mathematics across the district. This detailed plan, which has been developed over the past several months, is aligned with the district's improvement plan. It includes

- an additional one-two weeks of professional development in mathematics content and pedagogy for all teachers in principals each August before school starts;
- ongoing training in Cognitively Guided Instruction (a program designed at the University of Wisconsin specifically for Native American children) throughout the project period;
- follow-up classroom observations by professional development providers throughout the project period;
- additional instructional coaching support in all Shannon County Schools throughout the project period and beyond;
- continued training of Building Leadership Teams and Collaborative Work groups throughout the project period and beyond to increase focus on data-driven student achievement and integration of Lakota studies into the regular academic program
- an instructional leadership class (Lenses on Learning) for all building principals, and district instructional coaches in RTI, literacy, mathematics and Lakota studies in Year 1. In this class, participants learn how to support improved instruction in mathematics. Additional instructional leadership programs will be designed for Years 2 and 3.

Year 1: Focus on Number Sense with Lakota integration

Year 2: Focus on Algebra with Lakota integration

Year 3: Focus on Geometry with Lakota integration

TOTAL: 90 hours per year

The pedagogy components of the program will be delivered by TIE. The content components of the program will be delivered by the CAMSE at Black Hills State University.

- b. Recruit, screen, and select external providers, if applicable, to ensure their quality. *Indicate the process used up to this point for selection of external providers. Provide a detailed plan for this process in the future. Who will be involved in the selection procedure? What criteria have been set?*

Contingent on funding, the district will contract with TIE to provide both technical assistance on implementation of the School Improvement Grant and for additional professional development in mathematics over the three-year grant period. In addition, the district will contract with the Center for the Advancement of Mathematics and Science Education (CAMSE) at Black Hill State University to provide the content portion of the mathematics professional development and with CORE for Response to Intervention (RtI) support.

These external service providers were selected because of their long and successful track record in South Dakota and their specialized expertise. TIE has been South Dakota's primary professional development provider for the past 25 years; CAMSE is one of the Centers of Excellence established within South Dakota's university system. This powerful combination of pedagogy and content expertise will help SCSD create a comprehensive, job-embedded professional development program that will be implemented over the three-year duration of this grant and will provide a minimum of 270 hours of professional development (90 hours each

year for three years) in number, algebra and geometry. CORE who will provide RtI support is an approved Turnaround and Transformation provider in many states in partnership with Global Partnership School.

Shannon County's District Leadership Team and Administrative Team were involved in the selection of the external partners.

- c. Align other resources with the interventions. *Describe other resources available to the district that will be leveraged to assist with interventions under SIG. Include participation in SDI+, RtI, Math Counts, Reading Up, etc. Address resources in terms of funding, staffing, partnerships, and support.*

The district participates in SDI+ and RTI. More than half a million dollars each year is paid out in paraprofessional teacher and principal incentives through SDI+. The district is required to partially match these funds this year (50%), will match 75% next year and will determine how to sustain the program the following year. The district has hired an RTI Interventionists at each attendance center and has piloted the intervention model in the schools. CORE has been involved with the training of all lower elementary staff.

- d. Modify its practices or policies, if necessary, to enable its schools to implement the interventions fully and effectively. *Describe policies and practices that will need to be changed in order to fully implement the selected interventions. What barriers exist? Indicate the willingness of the district to modify procedures along the way if needed.*

Since SDI+ has already set a precedent for performance-based pay, this should not be an issue in Shannon County. Evaluation instruments used for teachers and principals are subject to negotiations with the Shannon County Education Association. In addition, the length of contract is negotiated, so plans to extend the Alternative School calendar to accommodate year-round school will need to be discussed as the negotiations table.

- e. Sustain the reforms after the funding period ends. *Describe how the district will continue the reform efforts once the SIG funds no longer exist. Address funding, staffing, and other resources that will be needed to sustain the reforms.*

The district has considerable resources available through Title I and other federal programs, as well as impact aid. A sustainability plan will be developed in Year 3.

- (5) (Tier I & II) The LEA must include a timeline delineating the steps it will take to pre-implement and implement the selected intervention in each Tier I and Tier II school identified in the LEA's application. *Highlight major events and benchmarks for all schools over the first year pre-implementation and the remaining three year implementation time period. The timeline should be from the district perspective.*

Timeline for Alternative School Interventions:

Year One Activities	Year Two Activities	Year Three Activities
<p>Spring, 2011—Hire new principal</p> <p>Spring 2011—Hire full time instructional coach</p> <p>Spring, 2011—Contract with external services providers TIE and CAMSE</p> <p>Summer, 2011—Planning for use of new curriculum materials and alternate calendar with staff</p> <p>Fall, 2011—Implementation of professional development program and curriculum modules</p> <p>Fall, 2011--new year-round school calendar begins</p> <p>School Year 1—Staff plan parent training/involvement component</p> <p>School Year 1—External providers work with District Leadership Team to revamp evaluation system</p> <p>May of Year 1—District Leadership Team benchmarks progress toward project implementation and makes recommendations to inform future work.</p>	<p>School Year 2—Implementation of professional development program and new curriculum continue</p> <p>School Year 2—new evaluation/incentives system is implemented</p> <p>School Year 2—new parent involvement/training component is implemented</p> <p>May of Year 2—District Leadership Team benchmarks progress toward project implementation and makes recommendations to inform future work.</p> <p>Summer Year 2—School is extended through the summer</p>	<p>Program as described in the grant proposal is fully implemented</p> <p>Year 3-Sustainability plan is created</p> <p>May of Year 3—District Leadership Team benchmarks progress toward project implementation and makes recommendations to inform future work.</p> <p>Summer Year 3—School is extended through the summer. Transition to year-round school is complete.</p>

Timeline for Implementation of Professional Development within the School District

Overview of Proposed

Curriculum-based* Professional Development Program

Shannon County School District 2011-12

*does not include conferences or out-of district PD

Areas of Focus: Lakota Studies, Mathematics, Literacy

Before School

Creating Sacred Places for Children curriculum training for all Lakota studies and academic coaches, duration and frequency based on needs (Dr. Fox)--TBD

- ✓ July 27-28 SDI+ Summer Institute, RC Ramkota for all principals and BLT members (stipend to be announced)



- ✓ August 1-5 Algebra content for all teachers of math & paras (2 credit class, Black Hills State University)
- ✓ 3 days week of Aug1-5 Teaching Reading for all 6-8 teachers of literacy, science and social studies continuing thru school year to be scheduled outside of school day (2 credit class)
- ✓ August 8-12 (if needed) New Teacher (recommended teachers by area)/Principal Institute to include an orientation and tour of the geographical setting of the Pine Ridge Indian Reservation and Lakota way of life, classroom management, instructional resources, etc.
- ✓ August 15 District-wide in-service
- ✓ August 16 Building-based in-service/staff meetings
- ✓ August 17 Classroom preparation day

School Starts August 18

Throughout the School Year

- ✓ 4 days Lenses on Learning & 3 days Literacy Leadership for all principals and coaches to be scheduled throughout the year
- ✓ Building-based modeling/co-teaching pre-K-8 math customized to meet building needs (TIE— Kim Clark, Lucy Atwood). Includes also unit prep DDN sessions to be scheduled.
- ✓ Building-based modeling/co-teaching pre-K-5 literacy customized to meet individual building needs (CORE)
- ✓ Building-based modeling/co-teaching pre-K-8 *Creating Sacred Places for Children* curriculum customized to meet building needs (Lakota Studies staff)
- ✓ Monthly training sessions for all instructional paraprofessionals to support Lakota studies, math and literacy curricula.
- ✓ Pre-school/kindergarten training TBD
- ✓ DDN grade level sessions, one time per quarter per grade level
- ✓ Collaborative work group sessions to be scheduled by Building Leadership Team members 2 times per month before school or after school. (NOTE: A committee chaired by Coy Sasse is currently working on a plan to prioritize incentives for next year. The incentive for BLT/CWG participation may or may not continue based on budgeting priorities.)

In-service Days During the School Year

- ✓ 2.5 days algebra CGI/Common Core math standards (1 credit class, 15 contact hours)
- ✓ 2.5 days *Creating Sacred Places for Children* curriculum implementation

Optional Classes to be Offered:

- ✓ Adult Learning Theory/Guided Coaching
- ✓ Literacy by Design
- ✓ Classroom Management—1/2 day on August 15, ongoing with modeling, online components, part of “new/recommended” teachers—Robert Two Crow and Sandy Gaspar and principals (as they desire) will assist in developing the syllabus

(6) (Tier I & II) The LEA must describe the annual goals for student achievement on the State’s assessments in both reading/language arts and mathematics that it has established in order to monitor its Tier I and Tier II schools that receive school improvement funds. *List the reading and math annual goals for each of the Tier I and II schools the district commits to serve. The districts must use the Dakota Step (indicator) to define their measurable goals which are based upon the percent of*

proficient students. A goal that indicates safe harbor requirements may be appropriate (decreasing the non-proficient by 10% from the prior year.) Other goals should be set that are measurable and specify the indicator (district assessments) that will be used during each of the grant years.

The number of Shannon County Alternative School students scoring proficient or advanced on the DSTEP in reading will increase from 16 % in 2010 to 24 % in 2011.

The number of Shannon County Alternative School students scoring proficient or advanced on the DSTEP in mathematics will increase from 0% in 2010 to 10% in 2011.

NOTE: Targets are adjusted annually to meet safe harbor requirements for AYP. Targets are calculated by TIE staff and provided annually to the school.

The number of Shannon County Alternative School students demonstrating at least one year's growth on the Dakota STEP (SDI+ Calculation) for Reading and Math, SuccessMaker (1.0+ Grade Equivalent) for Reading and Math, and CBM Word Reading and CBM Math (1.0+ Grade Equivalent) will be more than 50% of the students who tested in both the Spring of the current and prior year for Dakota STEP and who tested in the fall and spring of each year for the district measures.

- ~~(7) (Tier III) For each Tier III school the LEA commits to serve, the LEA must identify the services the school will receive or the activities the school will implement. *Briefly describe the activities for all Tier III schools served. Specifics of the activities will be provided in each school section.*~~
- ~~(8) (Tier III) The LEA must describe the goals it has established (subject to approval by the SEA) in order to hold accountable its Tier III schools that receive school improvement funds. *List the reading and math annual goals for each of the Tier III schools the district commits to serve. The districts must use the Dakota Step (indicator) to define their measurable goals which are based upon the percent of proficient students. A goal that indicates safe harbor requirements may be appropriate (decreasing the non-proficient by 10% from the prior year.) Other goals should be set that are measurable and specify the indicator (district assessments) that will be used during each of the grant years.*~~
- (9) (Tier I & II) As appropriate, the LEA must consult with relevant stakeholders regarding the LEA's application and implementation of school improvement models in its Tier I and Tier II schools. *Describe consultation with school administration, teachers and other staff, and parents and community members. Indicate when and how the consultation took place.*

Shannon County Alternative School

Note: Planning for this application occurred during the 2009-2010 school year. The Shannon County Alternative School Improvement Team of Brownie Eagle Bull, Building Manager; Chris Benson, Parent/Community; Robert Lockhart, Title I Teacher; Lowell Phillips, Special Education Teacher; Terry Porter, Classroom Teacher; Velma Kills Back, Classroom Teacher; and Wilbert Buckman, Classroom Teacher met from 8:00-9:00 each Wednesday in March to review the application and implementation of the Transformation School Improvement Model.

For the current application, Superintendent Zephier visited with the current alternative school principal/district director of school improvement, Vickie Grant and building manager, Darrell (Brownie) Eagle Bull regarding the prospective 1003g grant opportunity on March 18, 2011. The district director of school improvement/alternative school principal, Vickie Grant and building manager, Brownie Eagle Bull discussed options later that same day as well as via phone and in person as the grant writing process evolved. Mr. Eagle Bull and Ms. Grant

participated in the 1003(g) Application Webinar on March 24, 2011 and the Senior Leadership Team consisting of Richard Zephier, superintendent/community member; Coy Sasse, business manager/community member; Maurice Twiss, federal programs director/community member; Vickie Grant, school improvement director, Robert Two Crow, Lakota studies director/community member; Beverly Bertram, SCEA President, Dana Christensen, technology director; Dennis Brewer, transportation director/community member; Terry Albers, human resources director/community member and principals, Monica Whirlwind Horse, Robert Hall, Larry Larson, Steve Selchert, Melvin Sierra, Barbara Ice, and Connie Kaltenbach discussed and endorsed moving forward with the Alternative School application on 3/28/2011. Addendum #1 is a letter from Darrell Eagle Bull and list of staff, students and parents describing the school's continuous efforts to assess needs and plan towards becoming a Transformation School.

Addendum 1: April 28, 2011 from Darrell Eagle Bull, Director of Student Services/Building Manager

As a school community we were very disappointed when we learned we were denied the SIG grant last May. We worked very hard with parents, students and staff in the planning of a transformation school. We held meetings with parents last April and May to discuss what our school would look like. It was very encouraging to see how excited everyone was to prove our Alternative school could show major growth. We felt like we are given a bad rap when it was posted in newspapers statewide that we're one of the poorest performing schools in the state of South Dakota. Our school population is made up of at risk, low achieving, social economically challenged and many students from many communities on the reservation.

After we received notice we were denied we still made some changes and will continue to do so. We started a (PAC) Parent Advisory Council in our building. We have close to 75% of parents coming each month. We hold meetings each month to discuss how to work together to have the best school on the reservation; topics may include student progress, discipline, attendance, curriculum, incentives and parental training.

The staff meets each Monday to discuss the start of the week and on Fridays to discuss closing out the week our main focus is to develop strategies, which will benefit our students. These conferences center on each student's academics and social skills which we are starting to see major changes in our school building.

We became very excited when we received word in March that we had the opportunity to reapply for the same grant again. I held a meeting with staff and students and ask if they wanted to try again. This time letting them know there might be a chance we wouldn't receive the grant again. As a staff we talked to our parents letting them know we're reapplying again. After speaking with everyone we chose to do it. I really hate to let down my students, parents and community by being denied once again. As a learning community we are making many improvements to ours school, we are making academic and social growth each year. But to have a Transformation Model school and making it work on the Pine Ridge Indian Reservation is a chance in a lifetime.



Darrell Eagle Bull – Director of Student Services

Staff	Students	Parents
Darrell Eagle Bull, Admin	Hoksila Arapahoe	JoAnn Sierra
Vickie Grant, Principal	Talon Bettelyoun	Lynx & Tina Bettelyoun
Velma Kills Back, Teacher	Kenneth Black Elk	Arlette Janis
Robert Lockhart, Teacher	Wolakota Win Blacksmith	Arlette Blacksmith
Terry Porter, Teachers	Cyrus Brave	Albert Brave
Robert Fire Thunder, Para	Katherine Brewer	Violet Alford & Lorenzo Brave Heart
Francis Big Crow, Para	Aria Camp	Victorio & Rayette Camp
Helen Buckman, Para	John Charging Crow III	John Charging Crow Jr.
Tim Carrick, Para	William Dillon	Naomi Dillon
Richard Little Bear, Para	Terrance Fisherman & Franklin Goings	Joyce Fisherman
Loren Waters, Para	Rachel Garnier	Geraldine Helper
Tom Vocu, Para	Chloe Hendrickson-Porter	Terry Porter
Monte Briggs, Para	Trina Lakota	Leon & Mayonne Lakota
Luwana Janis, Social Worker	Michael Little Bear	Belnita Little Bear
	Princess Little Moon	Geraldine Fast Horse
	Unique Little Moon	Cynthia Little Moon
	Maximus Martinez	Annabelle Martinez
	Keenan & Mahpiya Menard	Fred Menard
	Michael Montoya	Stephanie Palmier
	Payton One Feather	Jeanuelle Twiss
	Tianee Patton	Heather Red Hawk
	Samantha Pittman	Carla Pittman
	Denny Pourier	Linette Cross Dog
	Jordan Pourier	Lorna Pourier
	Lori Red Owl	Mildred Lone Hill
	Jesse Schmockel	Alice Big Crow
	Edwin Shields	Agnes Little Hawk
	Carly Shott	Melody Martin
	Benjamin Smoke	Lisa Lone Hill
	Shaniya Spider	Sandra & Brenda Spider
	Shania Two Bulls	Linda Two Bulls
	Tyrone Waters	Jenny Waters

	Brandon Watkins	Robert Watkins
	Sinte White Butterfly	Victoria White Butterfly
	Jamie Yankton	Creighton & Dawn Yankton

C. BUDGET: An LEA must include a budget that indicates the amount of school improvement funds the LEA will use each year in each Tier I, Tier II, and Tier III school it commits to serve.

The LEA must provide a budget that indicates the amount of school improvement funds the LEA will use each year to—

- Implement the selected model in each Tier I and Tier II school it commits to serve;
- Conduct LEA-level activities designed to support implementation of the selected school intervention models in the LEA’s Tier I and Tier II schools; and
- Support school improvement activities, at the school or LEA level, for each Tier III school identified in the LEA’s application.

Note: An LEA’s budget must cover the period of availability, including any extension granted through a waiver, and be of sufficient size and scope to implement the selected school intervention model in each Tier I and Tier II school the LEA commits to serve.

An LEA’s budget for each year may not exceed the number of Tier I, Tier II, and Tier III schools it commits to serve multiplied by \$2,000,000.

**School Budget categories for consideration in required budget narrative.
Aggregate school level budgets into a district level budget.**

Personnel: Salaries; paid to certificated individuals (i.e., certified teachers); staff that are not certificated (i.e., paraprofessionals, secretaries, teachers’ aides, bus drivers).

Examples: Teacher: \$40,000 @ .5 FTE = \$20,000
Paraprofessional: \$15,000 @ 1 FTE = \$15,000

Employee Benefits: Payments made on behalf of employees that are not part of gross salary (i.e., insurance, Social Security, retirement, unemployment compensation, workers compensation, annual leave, sick leave).

Examples: \$20,000 X 7.65% (Social Security-Medicare) = \$1,530
\$15,000 X 7.65% (Social Security-Medicare) = \$3,000

Travel: Expenditures for staff travel, including mileage, airline tickets, taxi fare, meals, lodging, student transportation.

Examples: 3 trips X 400 miles X .37= \$4,440
Bus - 5 days per week X \$20 per day X 20 weeks = \$2,000

Equipment: Equipment should include tangible, nonexpendable personal property that has a useful life of more than one year. This should include all electronic equipment such as laptop and desktop computers. The grantee will be expected to maintain an equipment inventory list.

Examples: Desktop computers @ \$1200 = \$3600
Laptop computer -1 @ \$900 = \$900

Supplies: Consumable supplies include materials, software, videos, textbooks, etc.

Examples: Reading books - \$300
Software for Math assistance program - \$175

Contractual: (Purchased Services) Personal services rendered by personnel who are not employees of Local Education Agency (LEA), and other services the LEA may purchase; workshop & conference fees, tuition, contracted services, consultants, scoring services, rent, travel, etc.

Example: Company A – Provide professional development workshop - \$1,200

Professional Development: Include these professional development related costs in your annual budgets and budget narratives.

Example: Professional development conference – New York
Airfare - \$550
Registration - \$250
Meals – 3 days @ \$36 per day = \$108
Lodging – 2 days @ \$175 = \$350
Miscellaneous – Cab - \$50

Indirect Costs: Grantees must have an approved restricted indirect cost rate before indirect cost may be charged to this program.

Include a budget description for each year of the proposed 3 year project. Provide details linking expenditures to requirements of the intervention selected for Tiers I and II. Indicate expenses related to strategies to be used in Tier III schools.

Grant Periods:

Project Year 1: July 1, 2011 – June 30, 2012
 Project Year 2: July 1, 2012 – June 30, 2013
 Project Year 3: July 1, 2013 – June 30, 2014

Personnel: This is the cost for an instructional coach and additional cost for staff days (10 Professional Development days for certified staff and 18 extended year days for instructional staff). \$102,084

	Year 1	Year 2	Year 3
Instructional Coach:	48,000.00	48,000.00	48,000.00
5 teachers, 10 PD Days:	12,000.00	12,000.00	12,000.00
Extended Contracts: 18 days, 5 teachers, 10 paraprofessionals	47,700.00	47,700.00	47,700.00

Employee Benefits:

Benefits (25% of salaries):	25,521.00	25,521.00	25,521.00
-----------------------------	-----------	-----------	-----------

Equipment: Workstations and consumables for the Synergistics Modules (Desks, chairs, computers and server.)

Computers and Furniture For Modular Laboratories	29,720.00
---	-----------

Supplies: Synergistics Modules from Pitsco Education. The labs focus on a variety of core curriculum topics, including science, technology, engineering, and math. Engaging students through a multimedia curriculum and hands-on activities, Modules are a proven method for effectively delivering core content knowledge at the middle-level and the lower grades. They coincide with our state standards. Curriculum cost of up to \$63,150.00 based on proposed modules, although no more than above amount.

Modules, module supplies, Information system	63150.00
---	----------

Contractual: Professional Development Consultant Costs

Services rendered by external PD providers	5,320.00	5,320.00	5,320.00
<u>Indirect Costs: .0252%</u>	5,690.00	3,350.00	3,350.00

Shannon County School District

Budget Information Title I School Improvement 1003(g)

Budget Summary

Schools	Project Year 1 7/01/11 - 6/30/12 (a)		**Project Year 2 7/01/12 - 6/30/13 (b)	**Project Year 3 7/1/13 - 6/30/14 (c)	Three-Year Total
	Pre-implementation	Year 1 - Full Implementation			
Shannon County Alternative Tier I		\$231,485.00	\$136,275.00	\$136,275.00	\$504,035.00
Name of School & Tier					
Name of School & Tier					
Name of School & Tier					
District - Level Activities					
Total Costs		\$231,485.00	\$136,275.00	\$136,275.00	\$504,035.00

*Use restricted indirect cost rate (same rate as regular Title I program)

** Contingent upon renewed federal funding

Business Manager Name and Signature: Coy Sasse

Superintendent Name and Signature: Richard Zephier

D. ASSURANCES: An LEA must include the following assurances in its application for a School Improvement Grant.

By submitting this application, the LEA assures that it will do the following:

- (1) Use its School Improvement Grant to implement fully and effectively an intervention in each Tier I and Tier II school that the LEA commits to serve consistent with the final requirements;
X I agree.
- (2) Establish annual goals for student achievement on the State's assessments in both reading/language arts and mathematics and measure progress on the leading indicators in section III of the final requirements in order to monitor each Tier I and Tier II school that it serves with school improvement funds, and establish goals (approved by the SEA) to hold accountable its Tier III schools that receive school improvement funds;
X I agree.
- (3) If it implements a restart model in a Tier I or Tier II school, include in its contract or agreement terms and provisions to hold the charter operator, charter management organization, or education management organization accountable for complying with the final requirements; and
X I agree.
- (4) Report to the SEA the school-level data required under section III of the final requirements.
X I agree.

E. WAIVERS: The SEA has requested waivers of requirements applicable to the LEA's School Improvement Grant. The LEA must indicate which of those waivers it intends to implement.

The SD DOE has requested and received the waivers below.

The LEA must check each waiver that the LEA will implement. If the LEA does not intend to implement the waiver with respect to each applicable school, the LEA must indicate for which schools it will implement the waiver.

- Waive section 1116(b)(12) of the ESEA "Starting over" in the school improvement timeline for Tier I and Tier II Title I participating schools implementing a turnaround or restart model.

F. WAIVERS: The SEA has not requested waivers of requirements applicable to the LEA's School Improvement Grant. The LEA may apply for the following waiver.

The SD DOE has not requested the waiver below.

The LEA must check each waiver that the LEA will apply. If the LEA does not intend to apply for the waiver with respect to each applicable school, the LEA must indicate for which schools it will implement the waiver. The waiver must be published for public comment prior to submission.

- Implementing a schoolwide program in a Tier I or Tier II Title I participating school that does not meet the 40 percent poverty eligibility threshold.

