

# ACSIP RESPONSES

Arkansas Association  
of Educational  
Administrators



Thank you for allowing us to submit comments on this topic, and we look forward to working with you as we move this item forward. Below are comments from our Federal Program Coordinators who work with the plan on a regular basis.

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### **General Comments on ACSIP Process by: Arkansas Association of Federal Coordinators**

#### Software -

- Current system is cumbersome and not user friendly due to the number of steps required to budget, allocate, and approve plans.
- The current software does not maintain a logical and consistent format (numbering, ordering of actions, print formatting, etc.)
- It is beneficial for schools to have the checks and balances built into the financial side of the current software.
- It has not been possible to get needed changes/updates made to current software program from designer.
- The current software does not allow users the ability to copy, paste, and spell check without having to go through multiple steps.
- The current software does not communicate with APSCN. It is imperative to be able to import budgets from APSCN to the Improvement Software and vice versa. This would improve transparency and accuracy of financial data and reduce duplication of effort at the district and state level.
- The ability to flag actions by program/fund should be retained.
- It is important to have the ability to be able to transfer the document (plan) into a pdf and Word document so that it is easy to work with and post on webpages.

**Summary on Software:** It is the Arkansas Association of Federal Coordinators' (AAFC) position that the Indistar software (currently being used by priority schools) is NOT the answer to software concerns, as it has many of the same issues as the current ACSIP software. ACSIP software should be designed with respect to the needs of all stakeholders. The AAFC should have representation involved with the ADE in the development/design and selection of any school improvement software. Transition and training time should be considered in the implementation of any new software.

#### Compliance Piece -

- All components required by law or rule (Federal/state/ADE) need to be prepopulated in the plan so that every district and school's plan looks exactly the same for these aspects. This would be similar to assurances that districts have to sign off on already.
- Schools and districts should have the ability to individualize how each of the prepopulated compliance pieces are met.



2. **ESEA Flexibility:** Describe how the use of ACSIPs has changed under the state's Elementary and Secondary Education Act (ESEA) Flexibility Plan.  
There were no fundamental changes in the use of the ACSIP. However, the flexibility plan did provide schools relief from automatic set-asides for Supplemental Education Services allowing schools flexibility for spending these funds. Separate and additional requirements were placed upon those schools identified as Focus and Priority Schools.
3. **Use of student data:** How is the student longitudinal data system used in ACSIP?  
All schools use data in the school improvement planning process, with the source of that data varying widely from district to district across the state. There is no direct connection between the ACSIP software and the state's longitudinal data system.
4. **Monitoring:** Act 807 of 2007 requires ADE to monitor each school's and each district's compliance regarding its ACSIP, including the use of funding for instructional facilitators, professional development, alternative learning environments, national school lunch students and English language learners. The law also requires ADE to monitor the implementation of programs for students who are testing below proficient. Describe ADE's ACSIP monitoring process, including any major changes in the process in recent years. Does ADE have the necessary tools to correct issues staff see when monitoring?  
ADE federal monitoring closely correlates to the compliance pieces required by law. It seems that many items that are checked on site could be checked by information already provided to the state through other means (ex. comparability report, para-professional HQT report, private school documentation, etc.). Issues found through the monitoring process are corrected at the district and school level with guidance from the ADE.
5. **ADE's use of ACSIP data:** Does ADE use the data in the ACSIP to identify patterns across all districts that may be useful in developing educational policies? For example, are ACSIP data on alternative learning environments (ALE) budget items analyzed, and then shared with and used by ADE staff responsible for overseeing ALE programs in the state? Are there barriers for aggregating and sharing this information across ADE? Can you identify any specific strategies that were successful in producing results?  
School districts are unaware of the collection or use of such data.
6. **Scholastic Audit:** Are most schools that receive a scholastic audit effectively incorporating the audit findings into their ACSIP? Additionally, standards 9.5 and 9.6 of the scholastic audit assess how well a school uses its ACSIP. For example, 9.6a assesses how well a school's ACSIP "is implemented as developed." Are the results from the scholastic audit for these standards shared with the ADE staff monitoring ACSIPs?  
AAFC is not aware of how effectively schools are incorporating the Scholastic Audit findings into their ACSIP nor whether the results of scholastic audits are shared with ADE staff outside of the School Improvement Specialist.

# Arkansas Education Association

# Arkansas Rural Education Association

# Arkansas School Boards Association

funding matrix being just that, a funding matrix. The 2007 changes to ACSIP serve to make it dangerously close to an expense matrix. In releasing the State from Lake View, the Arkansas Supreme Court inherently blessed the matrix as a funding model and not an expenditure model. Districts need to retain flexibility in how it uses its funding while being held accountable for the results attained from its expenditures.

ASBA acknowledges the federal accountability requirements inherent in the ESEA. We support the ADE's efforts of establishing an intensive support unit to act as a conservator to school districts under state control and to coordinate school improvement efforts of those schools designated as Needs Improvement Priority and Needs Improvement Focus through the state's ESEA Flexibility.

Part of the restructure of the ADE's School Improvement Unit in the first year of ESEA Flexibility was the implementation of Indistar, a web-based system that allows schools and districts to organize their school improvement efforts by meeting indicators of effective practice through a continuous cycle of assessment, planning, implementation and progress tracking where focus is clear, responsibilities assigned and efforts synchronized. The federal turnaround principles and Scholastic Audit indicators are pre-loaded into the platform.

ASBA believes that through this online system schools can build a comprehensive database of information designed to direct their school improvement actions. The ADE should continue to build out this system so that at the end of each year actual progress toward meeting the school's annual measurable objectives (AMOs) is reported. The extensive analysis of data elements should then serve as the school's comprehensive needs assessment.

Should the ADE decide not to seek an extension of its ESEA Flexibility, this online system could be modified to align with Adequate Yearly Progress (AYP) under NCLB.

ASBA believes that while each school has its own culture, there are so many success stories in the state that efforts to scale up the successes and mold them to fit struggling schools will bear better results than continuing to focus on incredibly lengthy reports such as ACSIP has become.

Looking to the future, ASBA believes a well structured community survey could be developed that would reveal the segments of the school community being well served and those with needs that were not being met. Such a survey could be developed into a great resource for both high achieving and struggling schools/districts by affording better information districts could use to improve than that gleaned by affixing a letter grade to each school. ASBA believes the goal of high student achievement for all of our state's public school students will be attained more readily by school support measures than by hammering schools.



# Arkansas Public School Resource Center

COE and the eight NCLB formula programs were all based on a comprehensive needs assessment. Consolidation of COE and the eight NCLB programs requires a district to only include the comprehensive needs assessment one time in ACSIP.

### **DEVELOPMENT**

The ADE was offered free development of an electronic district consolidated application by Southwest Labs (a USDE regional resource center in Austin, Texas). Southwest Labs had available federal funds for this purpose. ADE accepted and spent over a year working with Southwest Labs to include in both the narrative plans and the budgets all state and federally-required elements.

The federal budgets were developed using the Arkansas Public School Computer Network (APSCN) codes and functions. APSCN provided assistance to ADE staff in establishing each federal and state categorical budget. Using APSCN makes it easier for districts to budget and expend federal dollars. Auditors, monitors, ADE staff, patrons, etc. can review the budgets and plans to see how federal and state categorical funds are being spent. Each federal budget contains edit checks and balances for inclusion of required elements. An example is Title I requires districts with allocations of \$500,000 and above to set aside 1% for parental involvement. The budget is set up to require at least 1% to be budgeted for 2170 Parental Involvement before allowing the ACSIP plan to be submitted.

Title I requires districts with more than one school per grade level or more than 1,000 students to complete target area selection. This process determines which schools are eligible to be served by Title I based on poverty and the amount of Title I funds each school receives. This is a complicated process that has been automated in the ACSIP software as much as possible for districts.

### **IMPLEMENTATION**

The ACSIP plans are to help districts decide the most advantageous use of all funds available to the school and reduce man hours required in the submission of these separate plans.

Theoretically, a district:

1. Reviews the individual school comprehensive needs assessments for the district and for the individual schools within the district.
2. Reviews the evaluation of the program/approach if it is one that has been used in past years. Is the program successful? Are sufficient gains in education of students

5. Using federally-paid paraprofessionals to act as substitutes for district paid teachers.

## ISSUES

ACSIP is not perfect, but it does provide a structured model in electronic format which combines the state and federal requirements for applying for the use of funds. The ADE has the ability to make changes to the ACSIP plan. There will be a cost involved in making programming changes. David Bluestein left Southwest Labs after the launch of ACSIP and founded ii, Inc. He is still the programmer who makes whatever changes are sent to him by ADE. Mr. Bluestein is not in charge of deciding what changes are to be made. The ADE staff has this responsibility. A few issues to consider are:

- A. One problem is that the ADE allows ACSIP supervisors discretion in making decisions on what is included in ACSIP plans. There is no uniform administration of state-imposed requirements for ACSIP Actions. Every ACSIP supervisor imposes his own ideas on what is required. Examples:
  1. Some ACSIP supervisors require the names of each person employed by a federal or state categorical program as well as the FTE. The person's name is not a federal requirement. Federal programs approve positions, not people. It is the district's responsibility to hire someone who meets state certification requirements to fill the position, or in the case of paraprofessionals in Title I, the federal requirements. The ADE Standards Unit has the responsibility of checking certification of staff. This information is provided in APSCN.
  2. Some ACSIP supervisors require districts to include both the APSCN function and object in Actions. This is not a federal or state requirement for ACSIP.
- B. If a consolidated plan is no longer to be used in Arkansas, the Arkansas State Plan approved by USDE for federal NCLB programs must be amended to show whatever new method of submitting the federal applications will be used. Federal applications are required by USDOE for a district to legally receive and expend federal funds.

Possibly some of the local administrators and ADE staff who might complain about ACSIP have limited work experience with COE, eight federal applications, and four state categorical applications which had to be done on paper or electronically without the checks and balances the ACSIP software provides. They may not realize the protection that these checks and

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Fourth, ASCIP does better on using data to improve instruction. Yet here there are many checklists, but insufficient guidance to assure that school staff will see these demands as possible. Here, ADE might consider making funds available so that low performing schools could visit higher performing peers. Certain schools and school districts serving high poverty populations have done very well. These include KIPP Delta, Rogers, Cross County, Acorn, Norfolk, and DeQueen. These districts excel at using data to guide teaching. In its Title One elementary schools, for example, Rogers hires substitutes for two days a year so teachers and support staff can go over the achievement levels on math and reading for every student in the school, and develop plans for each student. This has driven improvement to the point where Rogers has among the best achievement rates and graduation levels in the state despite 60% poverty and roughly one-third ESL. Visits to these high performing schools would make sense as a part of PD for low performing schools.

Fifth, there are now a great many good books on the how-to of using data to improve schooling, including Doug Lemov's Teach Like a Champion, Bambrick-Santoyo's Leverage Leadership. It strikes me that rather than having the state build its own list, which may or may not be followed, why not encourage schools to use materials like this, particularly for their new teachers. Low performing districts, after all, typically have high personnel turnover, which can be used to leverage school level change in culture and thus instruction.

Without such changes, particularly as regards personnel policy, particularly regarding teachers, I would have to agree with school officials who, as one of the documents put it "complained that the ACSIP process is too time consuming and not particularly useful to them." (That is what I have heard in a general way in fieldwork as well.)

**Finally, and most important, I would advise convening a meeting of outstanding educational leaders like KIPP's Scott Shirey (or Luke Vanderwale), Springdale's Gary Compton, Rogers' Janie Darr, and Cross County's Matt McClure, and have them come up with ways to improve and streamline these documents. Those leaders on the ground would have far more sensible thinking on this matter than I can offer.**

Whatever you decide to do, we are glad to help out, and do feel free to continue the conversation.

Bob

### **Robert Anthony Maranto, Ph.D.**

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#### **References**

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Maranto, R. and James Shuls. (2013). "How to Get Them on the Farm: Efforts to Improve Rural Teacher Recruitment and Retention in Arkansas," The Rural Educator. 34: 1 (fall 2012), 32-40.

Senator Bruce Holland  
Senator Jim Hendren

Representative James Ratliff  
Representative Bruce Cozart

To facilitate the work of the Subcommittee, we are writing to request your assistance in identifying issues and developing solutions to address the concerns related to ACSIP Plans. To assist you in this process, copies of the pertinent sections of the Arkansas Code Annotated, Arkansas Department of Education's ACSIP rules, and other informational documents are attached. We would ask that you provide a written response by the close of business on Monday, December 2, 2013, to the staff of the Subcommittee, Mr. Mark Hudson. Please email the document to Mark at [mark@blr.arkansas.gov](mailto:mark@blr.arkansas.gov).

After receipt and review of your responses, a meeting or series of meetings of the Subcommittee will be scheduled to discuss the identified issues and possible solutions to them.

Thank you for your assistance in this matter. We look forward to working with you to address this important issue. Please do not hesitate to contact either of us if you have any questions or if you need additional information.

#### Attachments

cc: Members of the Joint Ad Hoc Subcommittee on Arkansas Comprehensive School Improvement Plans  
Members of the House and Senate Interim Committees on Education

#### **Mark Hudson**

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Dr. Gary Ritter  
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this. Nevertheless, the ADE could still circulate a streamlined version of the ACSIP plan as an example set of guidelines for districts engaging in a school improvement or strategic planning process.

3. The documents do need to be streamlined as they are organized in arbitrary and perhaps unhelpful ways that likely are annoying to those completing the forms (too many of these annoying situations likely lead to educators viewing this as a frustrating process rather than an opportunity for growth). For example, in a section on interventions used, the school leaders filling in the forms must separate the interventions that they are doing into categories that are confusing and overlapping. The three categories are: a.) Supporting Leadership to Build Capacity for Improvement; b.) Building the Capacity in School Leadership to Identify Research-Based Teaching Strategies; and c.) Build the Capacity in School Leadership for Comprehensive and Effective Planning. I imagine that the school leaders who just spent hours trying to figure which intervention fits in which column quickly becomes more interested in getting the report done than in figuring out innovative ways to improve the school environment. There are numerous instances that are similarly challenging, in my view, in the reporting documents.
4. There are a couple VERY POSITIVE items in the ACSIP checklists that are likely very important. One potentially meaningful item is: "The LEA implements strategies to ensure that poor and minority students are not taught at higher rates by inexperienced, unqualified, and out-of-field teachers." It would be a VERY IMPORTANT step forward if the ADE could ensure that this was not happening in districts; I am skeptical that many districts have implemented successful strategies toward this goal of getting equally effective teachers into classrooms with poor and minority students.
5. Finally, there is another item that states "Professional Development Funding Reflects Best Practices" ... this is a great example of a line item that is not very helpful and could be taken out of a streamlined document. I believe it is not helpful because there is VERY LITTLE IF ANY EVIDENCE available to guide us in deciding what professional development looks like.

I thank you very much for reading my thoughts and I would be glad to comment more or discuss my thoughts with you in the future. I am very sorry for my tardiness in submitting these comments. Furthermore, I am sorry for the scattered nature of my comments, but I hope there are some helpful pieces in here nevertheless.

IN SUM, I would like to emphasize three key points. First, the documentation required could be used by school leaders to encourage thoughtful reflection and planning, but it should be streamlined. Second, it seems unlikely that this process can be meaningfully used for ALL districts in the state and it should thus be used for a subset of districts that truly need the help of the ADE and of the process. Third, I believe the process would be improved if it focused less on compliance and paperwork and more on the strategies to improve the effectiveness of teaching personal and to enhance learning opportunities for all students and particularly for disadvantaged students.

Thank you very much.

Sincerely,  
Gary Ritter

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**From:** Hudson, Mark [mark@blr.arkansas.gov]  
**Sent:** Thursday, November 07, 2013 10:07 AM  
**To:** 'costrell@uark.edu'; 'rmaranto@uark.edu'; 'GaryR@uark.edu'; Scott Smith  
**Subject:** ACSIP Plans

#### MEMORANDUM

**TO:** Dr. Robert M. Costrell, Professor of Education Reform and Economics, Department of Education Reform, College of Education and Health Professions, University of Arkansas, Fayetteville



Attachments

cc: Members of the Joint Ad Hoc Subcommittee on Arkansas Comprehensive School Improvement Plans  
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