



Report to the Chairman, Committee
on Education and the Workforce,
House of Representatives

September 2013

RACE TO THE TOP

States Implementing Teacher and Principal Evaluation Systems despite Challenges

GAO Highlights

Highlights of [GAO-13-777](#), a report to the Chairman, Committee on Education and the Workforce, House of Representatives

Why GAO Did This Study

Education created RTT under the American Recovery and Reinvestment Act of 2009 to provide incentives for states to reform K-12 education in areas such as improving the lowest performing schools and developing effective teachers and leaders. In 2010, Education awarded 12 states nearly \$4 billion in RTT grant funds to spend over 4 years. A state's RTT application and scope of work included the state's plans for development and implementation of teacher and principal evaluation systems by participating school districts. These systems assess teacher and principal effectiveness based on student academic growth and other measures, such as observation of professional practice. Currently, additional states are designing and implementing similar evaluation systems.

GAO was asked to review RTT teacher and principal evaluation systems. This report examines (1) the extent to which the 2010 grantee states have implemented their teacher and principal evaluation systems, (2) the challenges the grantee states have faced in designing and implementing these systems, and (3) how Education has helped grantee states meet their RTT objectives for teacher and principal evaluation systems.

GAO reviewed relevant federal laws, regulations, and guidance; analyzed RTT applications and documentation on each state's guidelines for their evaluation systems; and interviewed officials from all 12 states, selected districts, and Education.

What GAO Recommends

GAO is not making recommendations in this report.

View [GAO-13-777](#). For more information, contact George Scott at (202) 512-7215 or scottg@gao.gov.

RACE TO THE TOP

States Implementing Teacher and Principal Evaluation Systems despite Challenges

What GAO Found

By school year 2012-13, 6 of 12 Race to The Top (RTT) states fully implemented their evaluation systems (i.e., for all teachers and principals in all RTT districts). However, their success in fully implementing by the date targeted in their RTT applications varied. Three of these states met their target date while three did not for various reasons, such as needing more time to develop student academic growth measures. The six states that did not fully implement either piloted or partially implemented. The scope of pilots varied. One state piloted to about 14 percent of teachers and principals while another piloted to about 30 percent of teachers. State or district officials in four of the six states expressed some concerns about their readiness for full implementation.

Implementation status of evaluation systems in school year 2012-13	Delaware	District of Columbia	Florida	Georgia	Hawaii	Maryland	Massachusetts	New York	North Carolina	Ohio	Rhode Island	Tennessee
Teacher evaluations	●	●	●	○	○	○	○	○	●	○	●	●
Principal evaluations	●	●	●	○	●	○	○	○	●	○	●	●

- Full implementation by all RTT districts
- Pilot or partial implementation

Source: GAO analysis.

Officials in most RTT states cited challenges related to developing and using evaluation measures, addressing teacher concerns, and building capacity and sustainability. State officials said it was difficult to design and implement rigorous student learning objectives—an alternate measure of student academic growth. In 6 states, officials said they had difficulty ensuring that principals conducted evaluations consistently. Officials in 11 states said teacher concerns about the scale of change, such as the use of student academic growth data and consequences attached to evaluations, challenged state efforts. State and district officials also discussed capacity challenges, such as too few staff or limited staff expertise and prioritizing evaluation reform amid multiple educational initiatives. Officials in 10 states had concerns about sustaining their evaluation systems.

Education helps RTT states meet their goals for teacher and principal evaluation systems through a new monitoring process and through technical assistance. Education officials said the RTT monitoring process differs from other monitoring efforts in the frequency of contact with the states and the emphasis on continuous improvement and quality of RTT reforms. Officials from 8 of the 12 RTT states expressed generally positive views about Education's monitoring. When states have not demonstrated adequate progress, Education has taken corrective action. For example, Education designated two states as high-risk, which resulted in additional monitoring. Education provides technical assistance through a contractor; officials from 10 RTT states told us assistance related to evaluation systems was generally helpful. Education officials said they plan to provide RTT and nongranter states with more information to support their efforts.

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Abbreviations

Education	U.S. Department of Education
ESEA	Elementary and Secondary Education Act of 1965
Recovery Act	American Recovery and Reinvestment Act of 2009
RSN	Reform Support Network
RTT	Race to the Top
SLOs	student learning objectives
SY	school year

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September 18, 2013

The Honorable John P. Kline
Chairman
Committee on Education and the Workforce
House of Representatives

Dear Chairman Kline:

The U.S. Department of Education (Education) created Race to the Top (RTT) to provide incentives for states to implement large-scale, far-reaching reforms to improve student achievement, close achievement gaps, and increase graduation and college enrollment rates.¹ This program is part of the current administration's larger effort to ensure that students are college and career ready. RTT is the largest competitive grant fund ever administered by Education, and in 2010, Education awarded nearly \$4 billion in grant funds to 12 states. To be competitive for RTT grants, states had to demonstrate a commitment to reforming K-12 education across four interconnected areas: adopting standards and assessments, building data systems, supporting teachers and principals, and improving the lowest-achieving schools. Among the reforms related to teachers and principals, Education called for states and their participating school districts to improve teacher and principal effectiveness by developing evaluation systems that, in part, take into account data on student academic growth and inform personnel decisions, such as compensation, promotion, and retention.² Education is also using other means to encourage reforms of teacher and principal evaluation systems. Currently, many non-RTT states and districts are designing and implementing evaluation systems to receive waivers from certain requirements of the Elementary and Secondary Education Act

¹ The American Recovery and Reinvestment Act of 2009 (Recovery Act) established the State Fiscal Stabilization Fund and required Education to use it for, among other purposes, "State Incentive Grants" to states that make significant progress in meeting specified education-related objectives. Pub. L. No. 111-5, §14006, 123 Stat. 115, 283. Education subsequently established the Race to the Top grant fund to implement this provision.

² Throughout this report, we use the term student academic growth to mean student growth, as defined by Education for the purposes of RTT. In addition, we use the term school districts or districts to refer to local educational agencies.

(ESEA) of 1965, as amended.³ In addition, Education has prioritized evaluation system reform by setting a goal in its strategic plan to increase the number of states and districts that have comprehensive teacher and principal evaluation systems. More broadly, the current administration has included evaluation systems as an area of reform in its blueprint for revising ESEA.

In 2011, we found that some states faced challenges implementing their RTT initiatives.⁴ We also found that states had made amendments to their RTT plans—including their evaluation systems—such as changes to costs and timelines.⁵ You asked us to provide information about RTT grantees' progress toward implementing their teacher and principal evaluation systems. In this report, we examined (1) the extent to which the 2010 grantee states have implemented their teacher and principal evaluation systems; (2) the challenges the grantee states have faced in designing and implementing these systems; and (3) how Education has helped grantee states meet their RTT objectives for teacher and principal evaluation systems.

In conducting this work, we focused on the 12 states that received RTT grant funds in 2010.⁶ We interviewed state officials from all 12 grantee states as well as school district officials in Maryland, New York, and North Carolina, either in person or by phone. We chose states that differed in terms of the flexibility they provided to districts to design their teacher and principal evaluation systems (Maryland and New York offer districts more flexibility, whereas North Carolina has a statewide evaluation system and

³ Under the ESEA, as amended, states and school districts may request a waiver of certain ESEA requirements from the Secretary of Education. 20 U.S.C. § 7861. To receive the waivers, Education requires states and districts to implement certain programs and policies, including the development and implementation of teacher and principal evaluation and support systems that meet criteria similar to those used for RTT. As of August 5, 2013, in addition to the 12 RTT states in our review, 28 states were approved for ESEA waivers, and requests from 8 additional states (including Puerto Rico and the Bureau of Indian Education) were under review, according to information on the Department of Education's website, <http://www.ed.gov/esea/flexibility>.

⁴ GAO, *Race to the Top: Reform Efforts are Under Way and Information Sharing Could Be Improved*, GAO-11-658 (Washington, D.C.: June 30, 2011).

⁵ GAO, *Race to the Top: Characteristics of Grantees' Amended Programs and Education's Review Process*, GAO-12-228R (Washington, D.C.: Dec. 8, 2011).

⁶ Throughout this report, we refer to the District of Columbia as a state.

offers districts less flexibility). In selecting these states, we also considered the RTT award amount and the percentage of students served by school districts participating in RTT. We interviewed a total of 12 school districts in these three states. We asked state officials to identify districts that varied in terms of the design of their evaluation systems (if applicable) and the range of challenges they faced. Other criteria included whether a district was urban, suburban, or rural and the percentage of high-poverty or high-minority schools in the district.⁷ The views of these 12 districts cannot be generalized to all districts that participated in RTT, but they do provide important insights into some districts' experiences with RTT implementation. The state and district officials we interviewed provided information on the key components of their evaluation systems, the implementation status of these systems, what they considered to be their design and implementation challenges, and Education's monitoring activities and technical assistance. We also interviewed officials from unions or organizations representing teachers or principals in Maryland, New York, and North Carolina to obtain their perspectives on design and implementation challenges.

In addition, we reviewed documents to obtain information on states' guidelines for the evaluation systems used by their districts, including each state's RTT application, teacher and principal evaluation system manuals, and progress reports developed by the states and Education. We also reviewed relevant federal laws, regulations, and guidance and interviewed Education officials from the Implementation and Support Unit, as well as officials from the contractor Education hired to provide technical assistance. We obtained data from the contractor on the number and types of technical assistance activities provided to RTT states. We assessed the reliability of data by interviewing agency officials knowledgeable about the data and determined that the data were sufficiently reliable for the purposes of this report. The American Recovery and Reinvestment Act of 2009 (Recovery Act) requires that we conduct bimonthly reviews of how the act's funds are used by selected states and localities.⁸ This report fulfills this requirement in that we

⁷ We used the National Center for Education Statistics' Common Core of Data to examine these different characteristics. We assessed relevant documentation to determine that these data were sufficiently reliable for our purposes.

⁸ Pub. L. No. 111-5, § 901, 123 Stat. 115, 191.

examined the use of Recovery Act funds by the 12 states that were awarded RTT grants in 2010.

We conducted this performance audit from August 2012 through September 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

RTT Overview

In accordance with Recovery Act requirements, Education established the RTT grant fund to encourage states to reform their K-12 education systems and to reward states for improving student outcomes, such as making substantial gains in student achievement and improving high school graduation rates. States competed for RTT grant funds based on reforms across four areas:

- adopting standards and assessments that prepare students to succeed in college and the workplace and to compete in the global market;
- building data systems that measure student academic growth and success and inform teachers and principals about how they can improve instruction;
- recruiting, developing, rewarding, and retaining effective teachers and principals, especially where they are needed most; and
- turning around the lowest-achieving schools.

Education awarded RTT grants in three phases. Twelve states received grants in 2010 in Phases 1 and 2 to support the design and implementation of their teacher and principal evaluation systems and

other RTT reforms.⁹ Award amounts ranged from \$75 million to \$700 million (see table 1). States were required to subgrant at least 50 percent of their total grant award to districts that chose to participate in RTT. The 4-year grant period began on the date funds were awarded to the state. States must obligate all funds within that period, and they have 90 days following the end of their grant period to liquidate all obligated funds unless they receive a no-cost extension. Education may grant extensions for states beyond the 90 days on a case-by-case basis.¹⁰ Any Phase 1 and Phase 2 funds not obligated and liquidated by September 30, 2015, will revert to the U.S. Treasury.

Table 1: Race to the Top Grant Awards, by Phase and Amount Awarded

State	Total amount awarded (Dollars in millions)	Date grant awarded	Expected end date
Phase 1			
Tennessee	501	7/26/2010	7/25/2014
Delaware	119	6/11/2010	6/10/2014
Phase 2			
Florida	700	9/24/2010	9/23/2014
New York	697	9/24/2010	9/23/2014
Georgia	400	9/24/2010	9/23/2014
Ohio	400	9/24/2010	9/23/2014
North Carolina	399	9/24/2010	9/23/2014
Maryland	250	9/24/2010	9/23/2014
Massachusetts	250	9/24/2010	9/23/2014
District of Columbia	75	9/24/2010	9/23/2014

⁹ In 2011, Education granted funds to seven additional states in Phase 3 of RTT. Phase 3 grantees were chosen from those that applied for but did not receive funds in Phase 2. Education has also awarded other RTT grants since the inception of RTT, including those under the Assessment, Early Learning Challenge, and District programs. Subsequent appropriations provided funding for some of these additional RTT grants. See, for example, Department of Education Appropriations Act, 2012, Pub. L. No. 112-74, div. F, tit. III, 125 Stat. 786, 1093 (2011) and Department of Defense and Full-Year Continuing Appropriations Act, 2011, Pub. L. No. 112-10, § 1832(a)(2), 125 Stat. 38, 163. This study only includes states funded through Phases 1 and 2 because these states have had more time to design and implement their evaluation systems.

¹⁰ 34 C.F.R. § 80.23.

State	Total amount awarded (Dollars in millions)	Date grant awarded	Expected end date
Hawaii	75	9/24/2010	9/23/2014
Rhode Island	75	9/24/2010	9/23/2014
Total	3,941		

Source: Department of Education grant award notification letters.

Criteria for Awarding RTT Grants

Education identified 19 primary criteria to guide peer reviewers in the selection of states for RTT grants (see table 2).¹¹

Table 2: Race to the Top State Selection Criteria

Category	Criteria
A. State Success Factors	(A)(1) Articulating state's education reform agenda and local educational agencies' participation in it
	(A)(2) Building strong statewide capacity to implement, scale up, and sustain proposed plans
	(A)(3) Demonstrating significant progress in raising achievement and closing gaps
B. Standards and Assessments	(B)(1) Developing and adopting common standards
	(B)(2) Developing and implementing common, high-quality assessments
	(B)(3) Supporting the transition to enhanced standards and high-quality assessments
C. Data Systems to Support Instruction	(C)(1) Fully implementing a statewide longitudinal data system
	(C)(2) Accessing and using state data
	(C)(3) Using data to improve instruction
D. Great Teachers and Leaders	(D)(1) Providing high-quality pathways for aspiring teachers and principals
	(D)(2) Improving teacher and principal effectiveness based on performance
	(D)(3) Ensuring equitable distribution of effective teachers and principals
	(D)(4) Improving the effectiveness of teacher and principal preparation programs
	(D)(5) Providing effective support to teachers and principals
E. Turning Around the Lowest-Achieving Schools	(E)(1) Intervening in the lowest-achieving schools and local educational agencies
	(E)(2) Turning around the lowest-achieving schools

¹¹ Race to the Top Fund, 74 Fed. Reg. 59,688 (Nov. 18, 2009). In awarding the RTT grants, Education used a peer review process to evaluate applications. At Education's invitation, over 1,500 prospective reviewers applied or were nominated to review Phase 1 RTT applications. Education ultimately selected 58 reviewers.

Category	Criteria
F. General Criteria	(F)(1) Making education funding a priority
	(F)(2) Ensuring successful conditions for high-performing charter schools and other innovative schools
	(F)(3) Demonstrating other significant reform conditions

Source: 74 Fed. Reg. 59,688, 59,801-59,804 (Nov. 18, 2009).

Note: In addition to these criteria, Education gave states the option to include other proposals in their plans, such as proposals to prepare more students for advanced study and careers in science, technology, engineering, and mathematics fields and proposals for states to work together to develop joint longitudinal data systems.

The criterion—improving teacher and principal effectiveness based on performance— established the RTT guidelines for teacher and principal evaluation systems. Reviewers evaluated the state’s plan to ensure its participating RTT districts (1) measure student growth for each individual student; (2) design and implement evaluation systems, developed with teacher and principal involvement, that include multiple rating categories that take into account data on student growth as a significant factor; (3) evaluate teachers and principals annually and provide feedback, including student growth data; and (4) use these evaluations to inform decisions regarding professional development, compensation, promotion, retention, tenure, and certification.¹²

Education defines student growth as the change in student achievement for an individual student between two or more points in time. For students in grades and subjects that are tested by state standardized tests, Education defines student achievement as the score received on the state’s assessments required under the ESEA. For students in grades and subjects that are not tested by state standardized tests, Education defines student achievement based on alternative measures of student learning and performance. These measures include student scores on pre-tests and end-of-course tests, student performance on English language proficiency assessments, and other measures of student achievement that are rigorous and comparable across classrooms. Student achievement for students in tested grades and subjects can also

¹² In their RTT applications, states provided a narrative response and other supporting information, such as a budget and implementation timelines. See 74 Fed. Reg. 59,688, 59,803 (Nov. 18, 2009), criterion (D)(2) for Education’s complete criteria related to teacher and principal evaluation.

be assessed using other measures as appropriate, including the same measures as students in nontested grades and subjects.

Education provided background information in its notice of proposed priorities, requirements, definitions, and selection criteria for RTT on why it included student growth as a factor in its criteria for teacher and principal evaluation.¹³ Education noted the difficulty in predicting teacher quality based solely on the qualifications that teachers bring to the job. The department cited research on the limited predictive power of measures such as certification, education, and years of experience, and research on the value of measuring student growth to assess teacher quality.¹⁴ In response to public comments that expressed concern about the use of student growth data as the sole means to evaluate teachers and principals, Education revised its definitions of an effective teacher and effective principal to require that multiple measures be used to assess effectiveness, with student growth as a significant factor.¹⁵ Education also provided examples of these supplemental measures, such as multiple observation-based assessments of teacher performance and high school graduation rates as a measure for evaluating principals.

Education also established criteria for peer reviewers to consider a state's capacity to sustain its reforms. The criterion—building strong statewide capacity to implement, scale up, and sustain proposed plans—required reviewers to assess the extent to which the state had a plan to ensure sufficient capacity and use stakeholder support to implement its plans. States were evaluated on, among other things, the extent to which they demonstrated that they would provide strong leadership and dedicated teams to implement the reforms and use their fiscal, political, and human capital resources to continue successful grant-funded reforms after RTT funds are no longer available.¹⁶

¹³ Race to the Top Fund, 74 Fed. Reg. 37,804 (July 29, 2009).

¹⁴ See 74 Fed. Reg. 37,804, 37,806 (July 29, 2009) for the specific studies Education cited. We did not assess the validity of these studies.

¹⁵ 74 Fed. Reg. 59,688, 59,750-51 (Nov. 18, 2009).

¹⁶ See 74 Fed. Reg. 59,688, 59,801 (Nov. 18, 2009), criterion (A)(2) for Education's complete criteria related to state capacity.

Role of the Department of Education

Education is responsible for fiscal and programmatic oversight of all aspects of RTT, reviewing and responding to states' requests to amend their RTT applications, and providing technical assistance. To monitor states' progress, Education established a program review process that includes ongoing conversations with grantees, on-site program reviews, grantee self-evaluations, and meetings with Education officials. As we reported previously, Education uses a common set of questions to oversee state progress and to address specific needs and challenges of each grantee.¹⁷ Education also publishes annual reports to the public summarizing the progress of each state. To provide technical assistance, Education established the Reform Support Network (RSN), a 4-year, \$43 million technical assistance contract with ICF International, which works with Education to support RTT states.¹⁸

Education's process for reviewing and approving changes to a state's RTT plans includes reviewing the state's approved application, budget, and scope of work.¹⁹ According to Education's guidance, an RTT grantee must submit an amendment request for (1) a proposed revision that constitutes a change in activities from the approved grant project, regardless of budgetary impact; (2) budgetary changes, including transfers among categories or programs, that exceed \$500,000 of the current approved budget; or (3) changes to the list of districts participating with the grantee's RTT plan. Education will not approve amendment requests that would change the overall scope and objectives of the approved proposal, fail to comply with the terms of the award or the statutory and regulatory provisions of the program, or violate the general principles of the program.²⁰

Education's Institute of Education Sciences' National Center for Education Evaluation and Regional Assistance is conducting two studies that relate to RTT teacher and principal evaluation systems. One study

¹⁷ [GAO-11-658](#).

¹⁸ ICF International is a consulting firm that provides professional services and technology solutions to government and commercial clients.

¹⁹ Education's regulations require grantees to obtain prior written approval from the department for certain changes. 34 C.F.R. § 80.30. In addition, Education provided specific guidance to RTT grantees on the circumstances for and types of allowable amendment requests for the program.

²⁰ For more information on Education's RTT amendment process, see [GAO-12-228R](#).

will assess the RTT and School Improvement Grant programs and whether these programs are related to improvement in student outcomes. The results of this study, which will not specifically assess the impact of teacher and principal evaluations on student outcomes, are expected in 2014. In the second study, experimental teacher and principal evaluation systems will be implemented in schools in eight districts in order to study their effects on factors such as student achievement and teacher and principal mobility.²¹ A report on this study is expected in 2015.

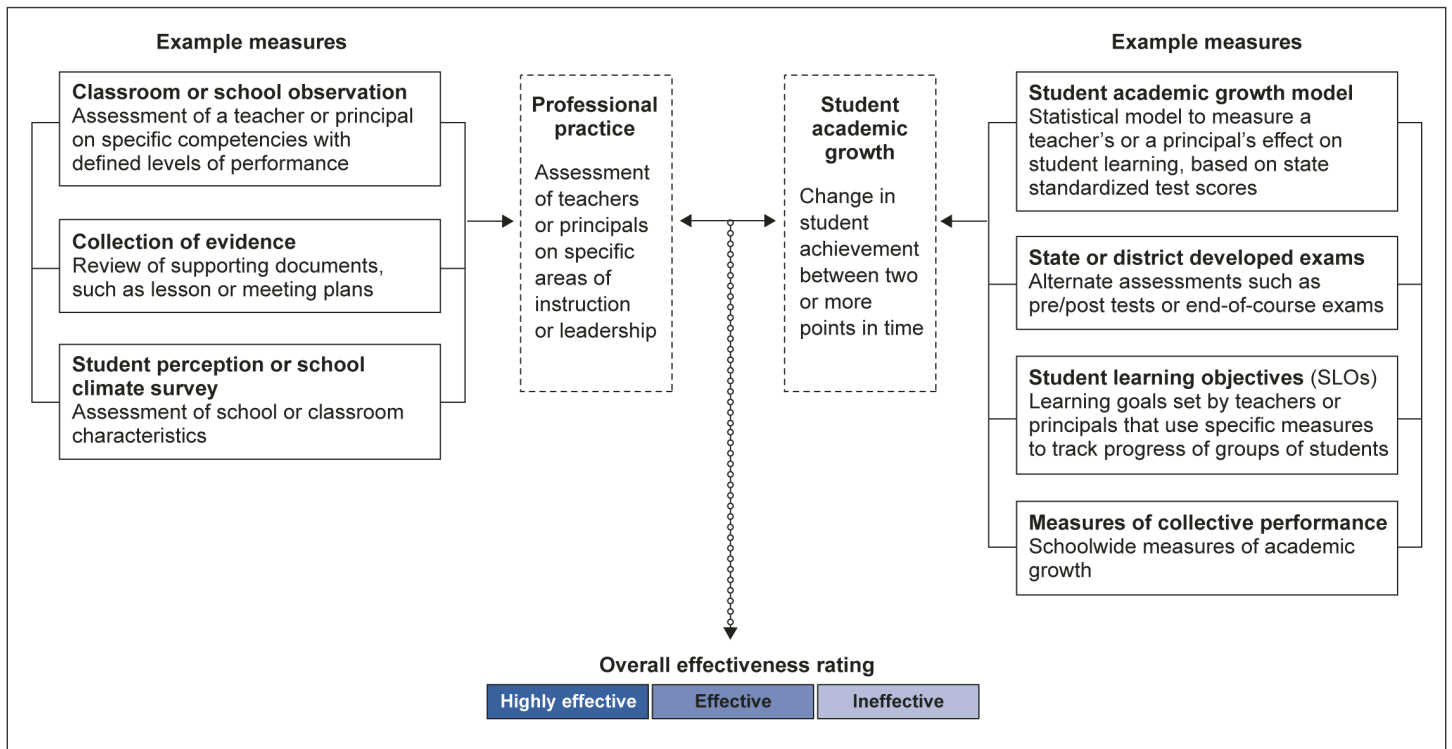
Teacher and Principal Evaluation Systems in the RTT States

The RTT states provide districts with varying amounts of flexibility to develop their evaluation systems. For example, some RTT states developed evaluation systems for use by all districts, unless a district develops an alternate evaluation system that meets state requirements. In other states, districts can develop their own evaluation systems within guidelines provided by the state, and the state must approve each district's system.²² Whether the evaluation system is developed by the state or the district, districts evaluate teachers and principals using multiple measures that assess professional practice and student academic growth (see fig.1).

²¹ Officials from the Institute of Education Sciences said they chose districts that did not have in place or did not plan to implement evaluation systems similar to the experimental evaluation systems.

²² In this report, when we discuss a state's evaluation systems, we are referring to the evaluation systems implemented by RTT districts in that state.

Figure 1: Example Components of Race to the Top States' Evaluation Systems



Source: GAO analysis of RTT states' documents.

Note: This figure is intended to provide examples of the components used in RTT states' evaluation systems; some states may not use the components described, and some states may use other measures beyond those included.

Six of 12 RTT States Fully Implemented Their Evaluation Systems by the 2012-13 School Year

According to state officials, 6 of the 12 RTT states fully implemented both their teacher and principal evaluation systems by school year (SY) 2012-13 (see fig. 2), though their success in meeting their original target date for implementation varied. The states that fully implemented their systems evaluated all teachers and principals in RTT districts, according to state officials.²³ The six states that fully implemented both teacher and principal evaluation systems targeted SY 2011-12 for full implementation in their RTT applications. Three of the six states met that target and SY 2012-13 was their second school year of full implementation. The other three states did not meet the targets set in their applications, but did fully implement their systems in SY 2012-13.²⁴ According to Education's amendment approval letters, states shifted implementation time frames, in part, because they needed additional time to develop student academic growth measures. For example, Delaware required an additional year to develop measures for its student academic growth component, which state officials said resulted in a better evaluation system.

²³ We considered a state's evaluation systems to be fully implemented if, according to state officials, all districts participating in RTT evaluated all of their teachers or principals using the major components of their new evaluation systems, even if not all assessment measures within the major components were used for every teacher or principal. We also considered evaluation systems to be fully implemented even if they were not used to inform personnel decisions or if some nonacademic staff, such as music teachers or district administrators, were evaluated differently while the state determined how to assess student academic growth for them.

²⁴ All three of these states—Delaware, North Carolina, and Rhode Island—submitted amendment requests to Education regarding timeline shifts, and Education approved these changes.

Figure 2: Implementation Status for Race to the Top States' Evaluation Systems, School Year 2012-13

Implementation status of evaluation systems in school year 2012-13	Delaware	District of Columbia	Florida	Georgia	Hawaii	Maryland	Massachusetts	New York	North Carolina	Ohio	Rhode Island	Tennessee
Teacher evaluations	●	●	●	⦿	⦿	⦿	⦿	●	⦿	●	●	●
Principal evaluations	●	●	●	●	⦿	⦿	⦿	●	⦿	●	●	●

- Full implementation by all RTT districts
- ⦿ Pilot or partial implementation

Source: GAO analysis.

Note: We categorized New York as partially implemented because the New York City Department of Education did not implement a state-approved evaluation system in SY 2012-13. According to state officials, the district accounts for approximately 34 percent of teachers and principals statewide. Officials from the New York City Department of Education stated they plan to implement their new evaluation system for the first time in SY 2013-14.

The six states that did not fully implement both their teacher and principal evaluation systems in SY 2012-13 either piloted or partially implemented evaluation systems,²⁵ according to state officials (see fig. 2). Based on the targets set in their RTT applications, four of the six states originally planned to fully implement by SY 2012-13 but are instead piloting or partially implementing their systems.²⁶ The proportion of teachers and

²⁵ We considered an evaluation system to be piloted if, according to state officials, a state was field-testing part or all of its evaluation system. We considered a state evaluation system to be partially implemented if a state implemented all major components of the new evaluation system for some, but not all, teachers or principals in RTT districts.

²⁶ Georgia received Education's approval to shift implementation time frames due, in part, to changes in state leadership. Maryland received Education's approval to pilot district evaluation systems in SY 2012-13—rather than fully implementing them—in part so that districts would have more time to improve their systems before using them for personnel decisions and to provide additional training on the systems. New York and Massachusetts did not submit amendment requests for their timeline shifts. As noted previously, we categorized New York as partially implemented because the New York City Department of Education did not have a state-approved evaluation system in SY 2012-13. According to Education officials, they are working with Massachusetts to clarify the state's plan for moving forward with full implementation and expect the state to submit a related amendment request.

principals participating in pilots varied. According to state officials, Hawaii's teacher evaluation pilot covered about 30 percent of its teachers, and Maryland's evaluation systems pilot covered about 14 percent of its teachers and principals in RTT districts. Among the four districts we visited in Maryland, district officials said the percentage of teachers who participated in the districts' pilots ranged from about 4 percent to 100 percent.²⁷ State or district officials in four of the six states expressed some concerns about their readiness for full implementation. For example, officials in one Maryland district that piloted with about 4 percent of teachers said they will move from learning about the system to full implementation without sufficient time to address issues that arose during the pilot. Similarly, officials in another Maryland district that piloted with about 5 percent of teachers and 19 percent of principals said the district did not have sufficient time to work with teachers and principals on the new evaluation systems and would have benefited from another pilot year. The Maryland district officials said that two individuals were responsible for all of the evaluation systems work. These officials added that they anticipate budget and staff reductions as they move from their pilot, in which about 100 teachers and 10 principals were evaluated, to full implementation that will cover more than 3,000 people.

According to RTT state officials, states are using or plan to use the results of their new teacher and principal evaluations to inform decisions regarding, among other things, professional development, compensation, and retention, in accordance with RTT.²⁸ For example, North Carolina officials said districts used evaluation results to assign underperforming teachers to professional growth plans that are intended to help them improve their teaching abilities. If a teacher's evaluation results do not improve, that teacher may be dismissed or face other consequences. Officials in Delaware and Florida said their states used evaluation results in their first year of full implementation to inform personnel decisions for

²⁷ In Maryland, RTT districts had flexibility with how to pilot their evaluation systems (e.g., with some teachers in all schools or with all teachers in some schools).

²⁸ Due in part to the difficulty of managing many changes simultaneously, including new curriculum and assessments in many states, in June 2013 Education offered states that have received ESEA waivers or RTT grants the option to request permission from Education to delay the use of their new evaluation systems to inform personnel determinations and consequences for up to 1 year. Education officials noted that many states are already successfully implementing these changes or have requirements in state law about implementation timeframes and thus may not need to request the waiver.

teachers and principals, such as retention rewards and dismissal. According to Hawaii officials, the state plans to fully implement its teacher evaluation system in SY 2013-14, but all consequences related to evaluations will be added the following school year. In several states, RTT districts decide how to use evaluation results to determine consequences. Ohio officials said that RTT districts were required to use evaluation results to inform some personnel decisions—including professional development, retention, and pay for performance—and the state surveyed RTT districts to confirm that they did so. Tennessee officials said that RTT districts were required to use the results of evaluations to inform certain personnel decisions, such as employment, compensation, and dismissal, but that the state did not prescribe the consequences attached to different ratings.

Most RTT States Cited Challenges with Developing and Using Certain Evaluation Measures, Addressing Teacher Concerns, and Building Capacity and Sustainability

RTT States Struggled to Develop and Use Student Learning Objectives and Assess Teacher Professional Practice Consistently

State or district officials in most RTT states (8 of the 12) said they had difficulty developing and using student learning objectives (SLOs) to assess student academic growth for teachers.²⁹ SLOs measure student academic growth for teachers in nontested grades and subjects, which represent 65 to 75 percent of teachers nationwide, according to an RSN report. SLOs are learning objectives for groups of students, such as students in a social studies class, that use a specific measure, such as a course exam, to track academic progress throughout a school year.³⁰ However, some RTT state and district officials said it can be difficult to ensure that these learning objectives are rigorous and accurately measure student learning. Tennessee officials said that while SLOs are popular and promising in theory, they are difficult to reliably implement

²⁹ RTT state and district officials generally discussed challenges related to student academic growth measures, particularly SLOs, in the context of teacher evaluation systems. Officials in one Maryland district said developing SLOs for principals was difficult because their learning goals sometimes covered few students. For example, a principal's goal of improving special education outcomes might be based on only a few special education students within a large school.

³⁰ Reform Support Network, *The View from the States: A Brief on Non-Tested Grades and Subjects*, accessed June 11, 2013, <http://www2.ed.gov/about/inits/ed/implementation-support-unit/tech-assist/resources.html>. Teachers in nontested grades and subjects would not have student scores on state-administered standardized tests that could be individually attributed to them. SLOs may be developed at the state, district, or school level and may be used as alternative student academic growth measures for evaluating teachers in nontested grades and subjects, or as additional student academic growth measures for evaluating teachers in tested grades and subjects. In some cases, scores on standardized tests may be used for SLOs. Principals may also be evaluated using SLOs.

Using Student Learning Objectives (SLOs) to Measure Student Academic Growth in a District with Few Students

Officials in a New York district explained that due to their district's small student population, some teachers may work in several subjects and thus may require several SLOs for their different subjects. Other teachers who work in fewer subjects may only need one or two. District officials said this creates inequity among teachers because the evaluation process is more complex and time-consuming with each additional learning objective. In addition, district officials noted that teachers may be unable to meet the overall SLO goal if they have even one student who misses their student academic growth target. As a result, achieving the highest rating would be very difficult.

because some teachers set non-rigorous goals in order to get high scores. Tennessee officials further explained that some teachers selected a schoolwide social studies score for their SLO measure—despite having no connection to the subject—because students did well on that exam, rather than selecting learning objectives relevant to their own subject matter. Officials in three Maryland districts said determining how to measure student academic growth using learning objectives was a challenge because, for example, they may have difficulty assessing students' abilities when they enter a class, not just when they leave. Officials in a New York district described the difficulty of implementing learning objectives in their small, rural district (see sidebar). Despite these challenges, RTT state and district officials said that SLOs improved their evaluation systems, in part by engaging teachers in the evaluation process and by leading to more in-depth discussions about teacher performance. To address some of their challenges, RTT states developed guidance, templates, or model learning objectives to help districts develop and use SLOs. In addition, states participated in an RSN-sponsored working group on developing SLOs. They could also access RSN guidance from Education's website that outlined the benefits of learning objectives and provided information about the elements that comprise rigorous, high-quality learning objectives.³¹

Some RTT state and district officials said it was difficult to ensure that principals assess teacher professional practice consistently. For example, officials said it was challenging to ensure consistency in how principals use classroom observations and other evidence, such as lesson plans, to assess a teacher's instructional methods.³² State or district officials in 6 of the 12 RTT states expressed concerns that, for example, some principals may not be appropriately identifying teachers who were ineffective and rating them accordingly.³³ Officials in a few of these states attributed this

³¹ Reform Support Network, *Targeting Growth: Using Student Learning Objectives as a Measure of Educator Effectiveness*, accessed June 11, 2013, <http://www2.ed.gov/about/inits/ed/implementation-support-unit/tech-assist/resources.html>.

³² In some cases, other school or district staff may conduct teacher observations or help with evaluations.

³³ RTT state and district officials generally discussed challenges related to evaluation consistency in the context of teacher evaluation systems. Officials in one North Carolina district said that using the same rubric to evaluate principals and assistant principals is challenging when evaluators interpret the roles of assistant principals differently in different schools.

Union Perspective on Evaluation Consistency

Officials from a state teachers' union said they had concerns about whether the evaluations of principals will include measures that address a principal's ability to appropriately evaluate teachers. Union officials noted that in general, teachers were concerned about how principals would be held accountable (i.e., who would be evaluating the principals). On the other hand, officials from a state principals' association said that principals are concerned that their peers might evaluate teachers less rigorously so that their school report cards, which provide aggregate information on teacher ratings for individual schools, reflect higher scores.

to principals lacking the skill to differentiate between effective and ineffective teachers, or the will to rate teachers in lower categories or to rate them lower than under the prior evaluation system. Officials in Tennessee and in two North Carolina districts said evaluation data have shown that some teachers with low scores on their student academic growth component received high professional practice ratings. They said this may indicate that some principals are inflating scores or not identifying lower-performing teachers and providing critical feedback. Officials in another North Carolina district described a different concern about the mismatch in professional practice ratings and student academic growth. They noted that student academic growth data are not available until the following year and might influence how some principals assess teachers in the year in which the data become available. For example, after receiving data that shows a teacher demonstrated good student academic growth the prior year, a principal might overlook poor classroom management when observing the teacher. Organizations representing teachers and principals also raised concerns about evaluation consistency (see sidebar).

State, district, or union officials in six RTT states described efforts to improve consistency in principals' evaluations of teachers, generally through training. In New York, officials from a state teachers' union said they provided training to more than 750 principals on ensuring consistency when conducting teacher evaluations. Tennessee officials said that during the first year of implementation, principals participated in 4 days of training and had to pass a test in order to perform classroom observations. During the second year, Tennessee identified principals who did not evaluate teachers appropriately and provided them with additional support and coaches. Officials also said that Tennessee plans to make its certification test more rigorous. Officials in one North Carolina district said that, in addition to providing state training and workshops on evaluation consistency, district administrators conduct informal classroom walk-throughs to observe teachers and then discuss rating consistency while comparing their notes with the principal's observation ratings.

Concerns about Magnitude of Change Challenged States' Efforts

State or district officials in 11 of the 12 RTT states discussed the difficulty of addressing teacher concerns about the scale of evaluation reform. According to these officials, teachers were concerned about some of the significant changes in the new systems, such as the use of student

academic growth data in evaluations and using evaluation results to make personnel decisions (e.g., retention or compensation).³⁴ For example, state, district, and union officials in Maryland said that teachers did not trust the validity of the state test scores used in some of the student academic growth measures. Officials in one New York district were concerned generally about the rise in annual testing and its use in evaluations to inform personnel decisions. District and union officials in New York said the release of teacher evaluation ratings to parents added to concerns about evaluation systems. Officials in one small district said their teachers were particularly concerned because protecting their anonymity might be difficult even if data are aggregated and not linked to individual teachers. Officials in three states and one district said they had difficulty convincing teachers that evaluation systems were focused on professional development, rather than consequences. Some RTT state and district officials said the simultaneous transition to new state assessments and the Common Core curriculum—a single set of educational standards in language arts and math—increased teacher concerns about consequences.³⁵ For example, North Carolina officials said teachers were concerned about the fairness of measuring student academic growth while schools are implementing a new curriculum. In some RTT states, according to state and union officials, lengthy collective bargaining processes or lawsuits slowed implementation efforts.³⁶

State and district officials said they took steps to address teacher concerns, in part by involving teachers in the design and implementation of the evaluation systems and through ongoing communication with teachers. State or district officials in 10 of the 12 RTT states highlighted efforts such as teacher participation on committees that designed the systems, teacher involvement in national training workshops, and regular communication and feedback from teachers on implementation. In addition, officials from all three state organizations representing teachers

³⁴ According to officials, measuring student academic growth for teacher evaluations was new to several states.

³⁵ The Common Core State Standards Initiative is a state-led effort, and all but five states have voluntarily adopted the standards.

³⁶ Officials in two RTT states identified union lawsuits as a factor that contributed to delays or uncertainty during implementation. In at least one state, litigation is ongoing, in both state and federal court. Other states may have also faced lawsuits but did not discuss them in our interviews.

said they helped develop the legal framework or overarching standards for their states' evaluation systems and participated on committees or provided training to teachers and principals to support their state's efforts. To reduce teacher concerns once reform efforts were under way, officials in Maryland regularly distributed a document to key stakeholders that, among other things, provided updates related to evaluation components. Officials in Georgia said they made presentations in the community, held focus groups in districts, and provided training to help manage the culture shift to the new evaluation system.

State or district officials in most RTT states (9 of the 12) said they faced fewer concerns related to principal evaluations due to greater principal support, the smaller scale of implementation, or because principals were used to being evaluated based on student performance. According to North Carolina officials, superintendents used student academic growth in principal evaluations prior to RTT, so principals did not have the same level of concern as teachers. In addition, North Carolina officials noted that the state had 2,600 administrators compared to 95,000 teachers, which made principal evaluation easier to implement. Hawaii officials said implementing principal evaluations was a generally collaborative and productive process for several reasons. For instance, they said principal associations were relatively easy to work with, administrator assessments already existed, and principals understood the need for a new evaluation system and contributed significantly to its design. In another state, officials from a principals' association echoed the view that principals were accustomed to being evaluated on student academic growth and added that principals in their state were more concerned about teacher evaluations than their own evaluations.

States Took Steps to Address Insufficient Capacity

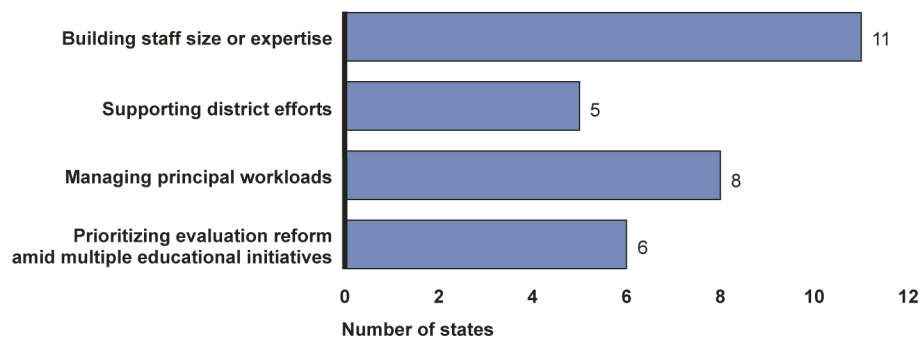
Insufficient state and district capacity challenged RTT states' efforts to design and implement their evaluation systems (see fig. 3).³⁷ State or district officials in most of these states said they lacked either sufficient staff or needed expertise when they began to reform their evaluation systems. Some state officials also said they faced capacity challenges

³⁷ Capacity challenges were generally related to the design and implementation of both teacher and principal evaluation systems. Officials in four RTT states said that capacity challenges pertained to both evaluation systems, but were more pronounced with teacher evaluations. Officials in one state said that capacity challenges pertained only to the teacher evaluation system.

related to supporting district efforts, such as reviewing and approving district evaluation systems and providing technical assistance. For example, Florida officials said that, because their RTT districts had the flexibility to design their own systems, it was difficult to develop solutions to challenges that would be applicable to all RTT districts.³⁸ State and district officials said that at the local level, districts had difficulty managing principal workloads or prioritizing evaluation reform amid multiple educational initiatives. For example, officials in a New York district said that the time commitment required for observing and evaluating teachers prevented some principals from thoroughly reviewing evidence submitted for evaluations or providing meaningful feedback to teachers. District officials in New York and Maryland told us that their evaluation reform efforts took precedence over other initiatives, such as implementation of the Common Core curriculum. Building capacity to enact education reforms has been a recurring challenge for states and districts, as we have discussed in previous reports.³⁹

Figure 3: Capacity Challenges Faced by Race to the Top States

Difficulty with:



Source: GAO analysis of state and district interviews.

Note: Officials in 8 of the 12 districts we spoke with discussed building staff size or expertise, managing principal workloads, and prioritizing evaluation reform as challenges. State officials noted that supporting district efforts was a challenge.

³⁸ As noted previously, the degree of flexibility districts had in designing their evaluation systems varied.

³⁹ See [GAO-11-658](#), [GAO-12-228R](#), and GAO, *School Improvement Grants: Education Should Take Additional Steps to Enhance Accountability for Schools and Contractors* [GAO-12-373](#) (Washington, D.C.: April 11, 2012).

One Race to the Top State's Cost Challenge

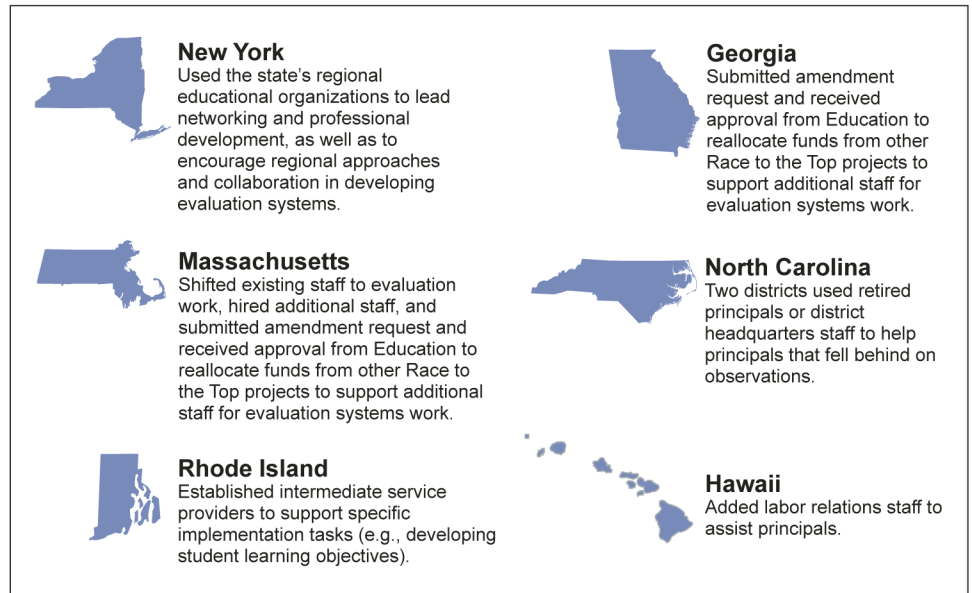
According to Delaware officials, the state underestimated the cost of designing its evaluation system, particularly the development of student academic growth measures. Because the state's initial plan did not require the development of additional measures, the state did not budget any funds for that work. However, the state later revised its approach and decided to create assessments or growth goals for all courses taught throughout the state. Education approved the state's amendment request to shift \$600,000 from other projects for this effort and to delay full implementation of the state's evaluation systems by 1 year. The state also contributed an additional \$1.1 million in state funds to do this work.

While RTT was designed to encourage education innovation and reform—rather than covering all costs of reform efforts—several state and district officials cited the high cost of designing and implementing evaluation systems as a challenge.⁴⁰ For example, officials in Hawaii and Delaware (see sidebar) noted that they underestimated how much it would cost to develop these systems. Similarly, officials in 7 of the 12 districts we spoke with said their RTT funds did not cover the costs of reforming their evaluation systems. For example, one small, rural New York district spent about \$62,400 on its teacher and principal evaluation systems in addition to the \$22,856 it received in RTT funds. Other New York districts faced similar challenges. A 2011 survey conducted by the New York State Council of School Superintendents shows that 81 percent of responding superintendents were concerned that cost considerations might prevent their districts from soundly implementing new evaluation requirements. Cost may have been more of a challenge for some districts because they were responsible for a significant part of the design and implementation work. Six of the 7 districts in which officials raised cost as a capacity challenge were in Maryland and New York, both of which provide RTT districts with significant flexibility to design their own systems. Officials in Tennessee explained that some RTT districts in their state did not have funding concerns because they used the evaluation system and data system provided by the state.

States and districts responded to capacity challenges through different efforts to supplement their staff and resources (see fig. 4). Several RTT states also submitted amendment requests and received approval from Education to shift funds among RTT projects to provide additional funding for particular aspects of their evaluation systems. For example, Tennessee shifted approximately \$1.1 million to support, among other things, additional training on evaluation systems because the state did not originally estimate sufficient funds for this purpose. Similarly, New York increased its budget for its evaluation systems by \$11.9 million by shifting funds to develop its student academic growth model, pilot evaluation system software, and provide additional resources to districts.

⁴⁰ As previously noted, capacity challenges were generally related to the design and implementation of both teacher and principal evaluation systems.

Figure 4: Examples of Race to the Top State and Selected District Efforts to Address Capacity Challenges



Source: GAO analysis of state and district interviews.

Finding Resources to Replace RTT Funds Challenges States' Sustainability Efforts

State or district officials in most RTT states (10 of the 12) said that fewer staff or other resources after RTT grant funds are no longer available could affect their ability to sustain their evaluation systems. For example, Rhode Island officials said they will likely lose staff that they hired using RTT funds because the state may not be able to use other education funds to make these positions permanent. Officials in New York said that with the loss of RTT funding, the state will have fewer staff to review district evaluation plans every year and to provide technical assistance to districts, as well as to manage the analysis of statewide evaluation data. District of Columbia officials were concerned that without RTT funds, they would be unable to pay the contractor that operates the student academic growth model used by its charter school districts.

Officials from all 12 RTT states said they are considering how to sustain their evaluation systems after RTT grant funds are no longer available. Officials in a few of these states discussed some of the difficulties they have faced in preparing for sustainability, such as turnover in state leadership and uncertainty over future funding levels, and a few officials provided examples of how they might address sustainability. For

example, Hawaii officials said they are considering how to reallocate funds to sustain the systems but are concerned about the availability of other federal and state funds to do so. Georgia officials said they are collaborating with stakeholders to develop a sustainability plan—to be completed in summer 2013. In addition, Florida officials said they were working to ensure that they have in-house expertise on all aspects of the evaluation systems. For example, contractors who assisted with the state’s student academic growth component will train state staff on how to run the models.

Officials in 5 of the 12 RTT states told us more information from Education could help address their concerns about sustaining their evaluation systems and other reforms after RTT grant funds are no longer available. Specifically, state and district officials from some of these states told us they were concerned about or would like guidance on how to use other federal funds to support their evaluation systems. For example, officials in one state said Education issued some guidance on acceptable uses of ESEA funding, but could provide more concrete information on how best to leverage those funds for RTT initiatives. In addition, Education officials told us a few states have requested technical assistance to support their sustainability planning. Officials from four states told us it was too soon for them to know whether they would need Education’s assistance with sustainability.

Education Supports RTT State Implementation Efforts through Monitoring and Technical Assistance

Education Monitors States Using a New Process to Hold Them Accountable for Quality of Implementation

Education developed a new process to monitor RTT states' progress toward meeting their RTT goals, including those related to teacher and principal evaluation systems.⁴¹ Education officials said that the RTT monitoring process differs from the department's other monitoring efforts in that Education has more frequent contact with the states in order to identify and address implementation challenges. In addition, the new process emphasizes states' continuous improvement and quality of RTT reforms, rather than focusing solely on compliance with laws and regulations and the ability of states to meet their time frames.⁴² Officials said the intensity of communication with RTT states and the quality standards are greater for RTT than for Education's previous monitoring efforts. Education developed the new process to provide assistance to RTT states as they implement comprehensive reforms and to differentiate support based on individual state needs.

Education officials said they work to identify and address obstacles to the goals states established in their RTT plans through ongoing communication, including monthly monitoring calls, the amendment consideration process, and other contacts with RTT state officials. To assess the quality of implementation efforts, officials said they consider each state's progress toward its goals and timelines, risk factors and

⁴¹ See Race to the Top Program Review Guide. The same monitoring process is used for teacher and principal evaluation systems and other reforms funded through RTT grants.

⁴² We found that the RTT monitoring process exceeds the minimum requirements established in Education's 2009 Handbook for the Discretionary Grant Process. While Education requires its offices to prepare annual monitoring reports and conduct quarterly fiscal reviews of all of its discretionary grant programs, the RTT process also requires monthly progress updates, annual on-site program reviews, and progress reports updated on an ongoing basis, among other components.

strategies for addressing them, and the state's own assessment of its quality of implementation, among other factors. For example, in addition to verifying that a state implemented an evaluation tool, such as a test or performance measure, Education officials work with the state to ensure that the tool is meeting the state's needs. Instead of focusing solely on RTT compliance, program officers also help identify areas in which Education can assist states in meeting their goals, according to Education officials.

Officials from 8 of the 12 RTT states expressed generally positive views about Education's RTT monitoring activities. Some said, for example, that Education officials were collaborative, well-informed, and that they generally provided useful feedback. For example, officials from one state said that Education staff were very detailed and thorough in monthly monitoring calls and that they usually provided actionable feedback. Officials from another state said they spoke almost daily with Education officials and received strong support. They noted that, as a result, monitoring reviews were not stressful, and they were not surprised by the results. Officials from another state said they appreciated the discussion with Education officials about the state's amendment requests and how Education worked with them to ensure that the state maintained its original RTT goals.

While RTT state officials expressed generally positive views about the monitoring process overall, officials in nine states expressed concerns about specific aspects of the process, including delays in the amendment process, time-consuming monthly calls and related requirements, and slow feedback from Education after site visits. Officials from one state said monitoring requirements seemed more burdensome than those for other federal education programs. Education officials stated that they have revised some aspects of their monitoring process in response to state feedback. For example, they modified the monthly monitoring call and onsite review protocols, revised the amendment process and dollar threshold amounts that require approval, and worked to explain the rationale and use of the information Education requests.

To ensure that states are held accountable for meeting their RTT goals for teacher and principal evaluation systems, Education may take the following corrective actions for states that have not demonstrated adequate progress in implementing their systems:

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- **Conditional amendment approval.** If Education has concerns about a state’s requested amendments to its RTT plans, it may grant conditional approval, requiring the state to provide additional information over a period of time. For example, Rhode Island submitted a proposed amendment requesting a change related to its use of SLOs. Education approved the request on the condition that the state provide additional information, such as quarterly progress updates during SY 2012-13 and additional reports.⁴³ In addition, Maryland received approval to decrease the percentage of the evaluation component that is based on student academic growth models on the condition that the state provide Education a plan for a statewide field test of its evaluation systems. Maryland was also required to commit to measuring student academic growth using common assessments of high school teachers and principals when those assessments are available, among other requirements. Education may also elect not to approve an amendment request.
 - **High-risk status.** Education placed 2 of the 12 RTT states—Georgia and Hawaii—on high-risk status because officials determined that the states required intensive attention and support in order to meet their RTT goals.⁴⁴ In July 2012, Education placed the teacher and principal evaluation portion of Georgia’s RTT grant on high-risk status because officials were concerned about the overall strategic planning, evaluation, and project management of the evaluation system. Education officials also expressed concern that Georgia had requested two major amendments that seemed to constitute significant changes to the evaluation system in the state’s approved plan. As a result of the high-risk designation, Georgia was required to provide Education a revised work plan for its system, monthly updates in accordance with the work plan, and related information. As of July 2013, Education officials said the evaluation system portion of Georgia’s RTT grant remains on high-risk status because of Education’s continued concerns about the quality of implementation. In December 2011, Education designated Hawaii’s entire RTT grant

⁴³ We previously found that Education applied greater scrutiny to requests that involved significant changes to RTT grantees’ planned activities, often by requiring that grantees provide additional information or seek consultation from issue-area experts within the department. See [GAO-12-228R](#).

⁴⁴ Under Education’s regulations, if Education determines that a grantee is “high-risk,” it may impose special conditions or restrictions on the grantee. Among other reasons, a grantee may be considered high-risk if the grantee has a history of unsatisfactory performance, is not financially stable, or is otherwise not responsible. 34 C.F.R. § 80.12.

as high-risk because the state experienced major delays and made inadequate progress on implementing its systems and because the scope and breadth of amendment requests indicated a potentially significant shift in the state's approved plans. Education temporarily placed Hawaii on a cost-reimbursement basis, which required the state to submit receipts for expenditures to the department prior to drawing down grant funds. The state was also required to submit documentation prior to obligating funds and to submit a revised scope of work and budget. As of July 2013, Education had removed Hawaii's high-risk designation based on the state's demonstrated progress in implementing its RTT reforms, including its evaluation systems.

- **Additional information.** Education has required certain reporting or follow-up information, other than that included in conditional approval of amendments or high-risk status, and has used other measures deemed appropriate. For example, according to Education officials, one state that experienced procurement problems is required to provide monthly procurement information to Education.
- **Withholding of funds.** Although Education may withhold grant funds from states if they do not comply with the terms of the award,⁴⁵ Education officials said they have not withheld funds from any RTT state. Officials added that states have always demonstrated progress toward addressing Education's concerns.

Education Provides Technical Assistance to Help States Resolve Implementation Issues

Education helps states meet their RTT goals and implement high-quality reforms by providing technical assistance, including access to experts and information on options for evaluation systems. Education officials said technical assistance helps states resolve implementation issues, including those identified through the monitoring process. Most RTT federal assistance is provided by the contractor-supported RSN, and Education also provides some technical assistance to RTT states.⁴⁶ RSN officials said they work closely with Education staff to learn about the

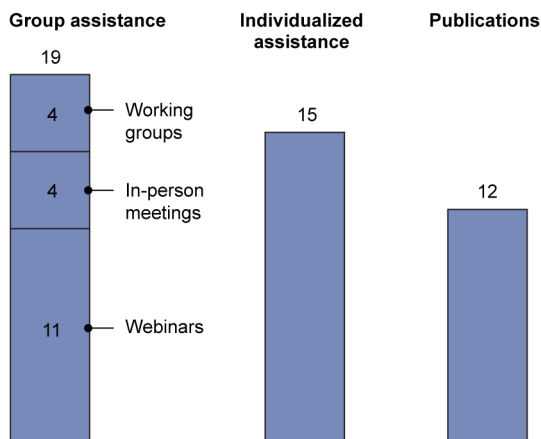
⁴⁵ If a grantee materially fails to comply with any term of an award, Education may take one or more of the following actions, as appropriate in the circumstances: (1) temporarily withhold cash payments pending correction of the deficiency or more severe enforcement action; (2) disallow (i.e., deny both use of funds and matching credit for) all or part of the cost of the activity or action not in compliance; (3) wholly or partly suspend or terminate the current award for the grantee's program; (4) withhold further awards for the program; or (5) take other remedies that may be legally available. 34 C.F.R. § 80.43.

⁴⁶ Some states said they also obtained technical assistance from entities outside the federal government, such as other states and nonprofit organizations.

types of technical assistance that might be useful to states on teacher and leader effectiveness, including teacher and principal evaluations, as well as other RTT topics.

From 2010 through March 2013, RSN provided technical assistance on teacher and leader effectiveness in group settings—such as webinars and in-person meetings—to RTT states, as well as individualized technical assistance (see fig. 5). RSN officials said they provide individualized assistance to states when requested, particularly for states in more advanced stages of implementation with needs that could not be met through larger group technical assistance activities. RSN also developed publications related to teacher and leader effectiveness, including case studies, tool kits, and lessons learned, and has provided them through the RTT grantee web portal. These publications included longer reports on school reform and shorter briefs, such as a paper that described rules governing classroom observations used in teacher evaluations in selected RTT states.

Figure 5: Cases of Technical Assistance Provided by the Reform Support Network to Race to the Top States on Teacher and Leader Effectiveness, Calendar Years 2010-2013



Source: GAO analysis of Reform Support Network data.

Note: Figure reflects assistance provided through March 2013. RSN provided the 15 cases of individualized technical assistance to 6 of 12 RTT states upon request.

RSN has worked to strengthen the quality of its technical assistance and adapt to states' changing needs, according to Education and RSN officials. They said that early in the contract, RSN revised its approach to

better meet the needs of states. For example, in response to state feedback, RSN provided states with access to education practitioners who had worked in schools rather than experts without hands-on experience, as they had done in the initial stages of the contract. RSN officials also said issues for which states requested technical assistance changed as implementation progressed, and RSN adapted its technical assistance accordingly. For example, early in implementation, states often requested assistance with designing evaluation systems, communicating with stakeholders, working with unions, and measuring growth in nontested grades and subjects, according to RSN officials. As implementation progressed, states requested assistance with issues such as the consistency of observations and the sustainability of evaluation systems.

Officials from 10 of the 12 RTT states told us that Education’s technical assistance related to teacher and principal evaluation systems was generally helpful, and officials in several states said assistance had improved since the start of the contract. Officials from Hawaii said RSN had helped states by sharing existing knowledge and developing new information. Officials in Massachusetts told us that RSN’s in-person meetings had been especially helpful because they provided a platform for states to share best practices. Although most states were complimentary of RSN assistance, officials in some states said RSN and Education could improve technical assistance by providing additional information on specific topics, such as information about states that have successfully implemented evaluation systems and more opportunities to share lessons learned.

A recent survey by RSN also indicates that states are generally satisfied with the contractor’s technical assistance on teacher and principal evaluation systems. In March 2013, RSN surveyed and obtained responses from officials in all RTT states regarding their perception of technical assistance, including assistance provided through the teacher and leader effectiveness community of practice.⁴⁷ Sixteen of the 18 states that participated in teacher and leader effectiveness assistance reported that they were satisfied or very satisfied with the assistance, and the remaining states were neutral. On multiple dimensions, the state officials

⁴⁷ RSN surveyed all 19 RTT states, including the 12 Phase 1 and Phase 2 RTT states and the 7 Phase 3 states. RSN surveyed RTT state leads—officials with primary responsibility for administering RTT.

rated assistance with teacher and leader effectiveness higher than other areas and higher than RSN activities overall.⁴⁸ States also identified opportunities for strengthening technical assistance by ranking potential topics on the basis of impact and urgency. For teacher and leader effectiveness, states ranked continuous improvement of teacher evaluation as one of the top areas of interest, according to RSN. Officials in a few states mentioned that they would like more opportunities to collaborate and learn from one another.

Education Plans to Provide RTT States and Nongrantees Additional Information to Support State Efforts

Education plans to provide information to RTT states on sustaining teacher and principal evaluation systems and other reforms, but Education officials said they have not yet done so. Education planned to launch a new workgroup in the summer of 2013 to help states consider how to sustain their evaluation systems after the RTT grant ends. Draft plans for the work group included providing expert and peer-to-peer support and developing a sustainability rubric. The plans also included providing workshops on sustainability efforts, including ones on state capacity, performance management, and communication, and eventually developing and sharing case studies. In July 2013, Education officials said they had postponed work in this area until fall 2013. Although Education has not asked states to provide specific plans for addressing sustainability, department officials said they have learned about state plans through ongoing communication with states. For example, a few states discussed their sustainability planning during monthly monitoring calls. In addition, Education obtained information on state sustainability strategies through RTT applications. In general, states provided this information on RTT reforms as a whole. We did not identify any states as having provided a sustainability strategy specific to teacher and principal evaluation systems.

⁴⁸ Other areas of assistance provided through RSN communities of practice include instructional improvement/ data systems, school turnaround, state educational agency capacity building, and stakeholder communications and engagement. States were asked to rate the impact of RSN technical assistance on RTT implementation on a scale of 1 to 5, with 1 representing low impact and 5 representing high impact. States rated the impact of teacher and leader effectiveness assistance on RTT implementation an average of 3.4 out of 5, compared to 2.4 for all RSN activities and 2.1 for state education agency capacity building. When asked about the extent to which RSN support has helped build state capacity, states rated the impact of teacher and leader effectiveness assistance higher than they did other RSN efforts.

To allow states more time to accomplish the goals and deliverables they committed to in their RTT plans, Education officials will consider requests for no-cost extensions, but they have not determined how to provide technical assistance during the extension period. States may request extensions on a case-by-case basis for more time to spend awarded funds for those aspects of their RTT reforms that require additional work. If approved, a state could have until September 30, 2015 to obligate and liquidate its remaining RTT grant funds.⁴⁹ According to Education officials, states that request no-cost extensions will be required to provide to Education their plans to address sustainability, among other information. As of July 2013, Education officials had approved two no-cost extensions related to teacher and principal evaluation systems, and officials in an additional state told us they had submitted an extension request related to their evaluation systems. Officials in 6 more of the 12 RTT states told us they are considering requesting extensions related to their evaluation systems. However, it is not clear what technical assistance would be available to states approved for no-cost extensions. The current contract for technical assistance ends in September 2014, and RSN officials said they do not have plans to sustain technical assistance beyond the duration of the current contract. Education officials said they were working to identify options for providing continued technical assistance.

Education has provided some information on RTT lessons learned to RTT and nongrant states, including information on certain aspects of evaluation systems. Education has taken steps to provide nongrant states with access to promising practices through the department's existing mechanisms, including the secure RTT grantee website and communities of practice, as we recommended in our 2011 report.⁵⁰ RSN officials said they were in the process of developing public access to the RSN web portal to allow nongrant states to access some, but not all, materials. In the meantime, nongrantees can access some information through Education's website, including materials generated through communities of practice and individualized technical assistance. Education posts to its website annual reports for each RTT state that include information on lessons learned. Education's RTT staff also said they collaborated with other Education program officials on a series of webinars for all states, including one on SLOs and another on schoolwide

⁴⁹ The actual extension date for each state, if requested and approved, will vary.

⁵⁰ [GAO-11-658](#).

student academic growth data. In addition to the materials currently available, Education officials told us that they were developing additional resources and materials on topics such as SLOs, observation rubrics, rating inflation, teacher engagement, data analytics, and leadership development. Education identified some products for targeted dissemination and presented them in conferences, cross-program meetings, and to organizations such as the National Governors Association, in order to promote awareness of the resources available. Education is also working to develop a more robust dissemination plan that includes ways to reach people other than state-level leaders, according to officials.

Concluding Observations

Education created the RTT grant program to encourage sweeping changes in K-12 education. RTT spurred changes to the way states and districts evaluate their teachers and principals, particularly with the addition of student academic growth data as a factor in assessing effectiveness. Education has been proactive in monitoring states' progress in implementing their evaluation systems, and the department's continued monitoring and assistance will be important to help RTT states overcome challenges and implement the reforms to which they committed. In addition, Education's new monitoring process has resulted in a wealth of information on states' efforts. As a result, Education is uniquely positioned to use the lessons learned from RTT states to inform other states' efforts to improve teacher effectiveness and ultimately raise student academic achievement.

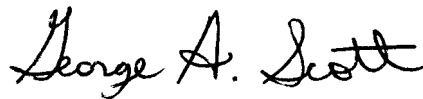
Agency Comments and Our Evaluation

We provided a draft of this report to the Department of Education for review and comment. Their comments are reproduced in appendix I. Education also provided technical comments, which we incorporated into the report.

We are sending copies of this report to the appropriate congressional committees and the Secretary of Education. In addition, the report is available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-7215 or scottg@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix II.

Sincerely Yours,

A handwritten signature in black ink that reads "George A. Scott". The signature is written in a cursive style with a large initial "G" and "S".

George A. Scott
Director, Education, Workforce,
and Income Security Issues

Appendix I: Comments from the U.S. Department of Education



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF THE DEPUTY SECRETARY

August 28, 2013

Mr. George A. Scott
Director
Education Workforce and Income Security Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Scott:

I am writing in response to the Government Accountability Office (GAO) draft report, "Race to the Top: States Implementing Teacher and Principal Evaluation Systems despite Challenges" (GAO-13-777). We appreciate the time that your office devoted to preparing this report and, in particular, the efforts that were made to describe the Department's work in ensuring that states are held accountable for meeting their Race to the Top goals, including those for teacher and principal evaluation systems.

We also appreciate the opportunity to provide comments on this draft report. We provide technical comments in the enclosure. We hope you find these helpful. Thank you again for your work and the opportunities we have had to provide clarifying comments throughout your process. We look forward to receiving the final report.

Sincerely,

A handwritten signature in black ink, appearing to read "Ann Whalen".

Ann Whalen
Director, Policy and Program Implementation
Implementation and Support Unit

400 MARYLAND AVE. S.W., WASHINGTON, DC 20202
www.ed.gov

Appendix II: GAO Contact and Staff Acknowledgments

GAO Contact

George A. Scott, Director (202) 512-7215 or scottg@gao.gov

Staff Acknowledgments

In addition to the contact named above, Elizabeth Morrison, Assistant Director, Nisha R. Hazra, Marissa Jones, and Michael Kniss made significant contributions to this report. Also contributing to this report were Deborah Bland, Sarah Cornetto, Jamila Jones Kennedy, Amy Moran-Lowe, Jean McSween, Mimi Nguyen, Jason Palmer, Kathleen van Gelder, and Rebecca Woiwode.

Related GAO Products

Department of Education

School Improvement Grants: Education Should Take Additional Steps to Enhance Accountability for Schools and Contractors. [GAO-12-373](#). Washington, D.C.: April 11, 2012.

Race to the Top: Characteristics of Grantees' Amended Programs and Education's Review Process. [GAO-12-228R](#). Washington, D.C.: December 8, 2011.

Race to the Top: Reform Efforts are Under Way and Information Sharing Could Be Improved. [GAO-11-658](#). Washington, D.C.: June 30, 2011.

Department of Education: Improved Oversight and Controls Could Help Education Better Respond to Evolving Priorities. [GAO-11-194](#). Washington, D.C.: February 10, 2011.

Grant Monitoring: Department of Education Could Improve Its Processes with Greater Focus on Assessing Risks, Acquiring Financial Skills, and Sharing Information. [GAO-10-57](#). Washington, D.C.: November 19, 2009.

Student Achievement: Schools Use Multiple Strategies to Help Students Meet Academic Standards, Especially Schools with Higher Proportions of Low-Income and Minority Students. [GAO-10-18](#). Washington, D.C.: November 16, 2009.

No Child Left Behind Act: Enhancements in the Department of Education's Review Process Could Improve State Academic Assessments. [GAO-09-911](#). Washington, D.C.: September 24, 2009.

Teacher Quality: Sustained Coordination among Key Federal Education Programs Could Enhance State Efforts to Improve Teacher Quality. [GAO-09-593](#). Washington, D.C.: July 6, 2009.

No Child Left Behind Act: Improvements Needed in Education's Process for Tracking States' Implementation of Key Provisions. [GAO-04-734](#). Washington D.C.: September 30, 2004.

Recovery Act

Recovery Act: Opportunities to Improve Management and Strengthen Accountability over States' and Localities' Uses of Funds. [GAO-10-999](#). Washington, D.C.: September 20, 2010.

Recovery Act: One Year Later, States' and Localities' Uses of Funds and Opportunities to Strengthen Accountability. [GAO-10-437](#). Washington, D.C.: March 3, 2010.

Recovery Act: Status of States' and Localities' Use of Funds and Efforts to Ensure Accountability. [GAO-10-231](#). Washington, D.C.: December 10, 2009.

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