

Opportunities for Delaware under the Every Student Succeeds Act

January 6th, 2017
Steven H. Godowsky
Secretary of Education
401 Federal Street, Suite 2
Dover, DE 19901-3639

Dear Secretary Godowsky,

We continue to appreciate the opportunity to share our feedback on the state's Every Student Succeeds Act (ESSA) plans. We hope the [previous letter](#) our group of 24 community and business organizations submitted is considered, and we submit this letter on our recommendations in response to the state's [draft plan components](#).

Long-Term Goals and Measures of Student Progress:

1. **We recommend that the next draft of the state's plan provide better, clearer, more transparent information on how students are currently doing against their goals and how our students might perform on any proposed goals if they continued on their current trajectory of growth and achievement.** For example, the following information would help us and the public weigh in more concretely on long-term goals:
 - a. What would our overall proficiency be for all students and for each sub-group each year if we met our current goals or any newly proposed goals?
 - b. Does our current growth trajectory put us on a path to meeting our current goals by the end of 2017? If not, how long would it take to meet these goals under our current growth trajectory?
 - c. What percentage of schools would meet our current or newly proposed goals if they continued on their current growth trajectory?

The answers to these questions would allow us to more fully understand if the goals are both ambitious and feasible for Delaware's students.

Accountability, Support, & Improvement for Schools:

Accountability

2. DE's current accountability system, [the Delaware School Success Framework](#), (DSSF) is based largely on school-wide averages, and includes "sub-group accountability" for some indicators, but not all. In addition, it uses a "student gap group" which doesn't differentiate among

each subgroup's performance. This approach masks important outcomes for historically underserved groups of students. ESSA requires this to change; **we support the need to be clear on how each sub-group is performing, and how the performance of each sub-group factors into a school's rating.**

3. In addition, **any school that is low-performing for any sub-group of students, should not be allowed to receive a high rating overall.**
4. **Ratings for schools and identification of schools for improvement should be aligned**, so that parents, schools, and the public have accurate and comprehensive information on school performance. (For example, a school shouldn't have a high rating under the DSSF and be on a *separate* list of schools for comprehensive support & improvement or targeted support & improvement.) The school rating system should be aligned with the system for identifying comprehensive support and targeted support and improvement schools and that information should all be in one place.
5. When identifying schools for comprehensive support & improvement and targeted support & improvement, **Delaware should look at the performance of ALL schools, not just Title I schools.**
6. **Finally, districts should be held accountable to the overall portfolio of schools within their management and oversight.**

School Improvement Processes - Needs Assessments

7. **Any school that is identified for improvement** - comprehensive support & improvement and targeted support & improvement - should be required to engage in a **high-quality needs assessment and submit an evidence-based plan for improvement.** Included in this should be information regarding resource inequities – both between the school identified and other schools in the district, as well as inequities within the school.
8. Any needs assessment tool should begin with a data-driven assessment of the strength of the **school leader and the teaching quality in the school.** This should include subjective (e.g. staff, student, and parent surveys, classroom observations, etc.) and objective measures of school leadership and teaching quality.
9. Delaware's current ESSA draft plan proposes that the state will support the needs assessment process by modifying current state-provided tools and resources, providing LEAs with an optional needs assessment tool to determine gaps and analyze root causes of underperformance, and providing a "suite of options" for targeted technical assistance. It would be **helpful to better understand in the next draft,**
 - a. **what specific tools the state plans to modify,**
 - b. **who will be supporting the needs assessment process, and**
 - c. **what specific targeted assistance will be provided.**

School Improvement Processes- School Planning & Monitoring

10. Schools need **coherent timelines for school improvement planning.** For schools to be ready to make changes at the start of a school year, the improvement plan should be submitted (Jan) and approved (Mar) early

enough so that key decisions, such as hiring teachers and instructional staff, assigning teachers and students, structuring the school day, and purchasing resources, can be made before the summer break. This timeline should apply **to all schools identified for comprehensive support & improvement or targeted support & improvement.**

11. Schools that have been identified as priority or partnership zone in the past, and are again identified under ESSA as comprehensive support and improvement, should be **required to submit an improvement plan with significantly different interventions and supports than submitted in previous plans**, unless they are showing a significant growth trajectory in student achievement, in which case they should be allowed to continue their positive trajectory. We recommend that ESSA should not result in a “resetting of the clock” for any school previously identified as a priority school.
12. The department should develop a **transparent, external process** for:
 - a. Approving external providers that are supporting schools identified for improvement
 - b. Approving plans for schools that are identified for improvement
13. The state should also establish a **transparent process for regular public reporting on the progress of improvement efforts in any schools identified for comprehensive support & improvement, and targeted support and improvement.** This should include the use of federal, state, and local resources to improve outcomes for students in these schools.

School Improvement Processes - Funding: Under ESSA states are required to set aside **7% of their Title I allocation** to support schools identified as comprehensive support & improvement and targeted support & improvement. It is estimated that this equates to roughly **\$3 million** for Delaware. Depending on the number of schools identified, if Delaware utilizes the federal formula for allocating these funds (\$500,000 for all comprehensive support & improvement schools and \$50,000 for targeted support & improvement) we could run out of money before some schools get anything. **We do not believe this is the most strategic way to allocate these funds.**

14. We recommend Delaware propose using a **hybrid of formula and competitive grant allocations** for this funding. The state could:
 - a. Provide equitable planning grants to all schools identified for improvement (based on either size and/or capacity of the district and school).
 - b. Base further allocations on the quality of schools’ plans, the needs identified in those plans, and the capacity of the district and/or school to implement those plans. The approval process for these plans should be transparent and involve external reviewers and expertise.

School Improvement Processes- Engagement: Families and community representatives should be a critical part of the school improvement process.

15. **The involvement of families should include the requirement for parent/family and community representation on any committee or decision-making body** for schools identified for comprehensive support & improvement, and targeted support & improvement.
16. **The state should also provide for the training and support of parents** so that they have the information and data needed to engage fully in the conversations around school improvement.

Public Transparency & Accessibility: The state should use the opportunity within ESSA to provide greater transparency to the public on the performance of Delaware schools. ESSA requires public reporting on a number of factors. This is valuable information for parents and community members to be armed with as we partner to support our schools and educators.

17. The department should create **one, online resource hub for public reporting and accountability** requirements under ESSA - including disaggregated data by sub-group for all accountability indicators, assessment participation rates, access to advanced coursework for students, exclusionary discipline rates, the professional qualifications of teachers, per-pupil expenditures by federal, state, and local funding source - among other indicators required under the new law. This should all be housed in **one public dashboard** rather than separate reports or pages.
18. The state should **engage the public in how to present this information** clearly. The current ESSA engagement process could be a valuable opportunity to solicit public input on how to present the information.
19. Delaware should **build upon existing data and reports** (such as the DSSF, school and district profiles, educator data analytics reports, among others) **to round out the information required by ESSA**, so that all public reporting is in one place and easy to access and understand.
20. The department should **ensure that parents that do not have access to technology in the home also have a mechanism for obtaining this information as well.**

Thank you again for the opportunity to share our recommendations. Please feel free to contact us if you have any questions.

Delaware ESSA Coalition



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