

Opportunities for Delaware under the Every Student Succeeds Act

Delaware ESSA Coalition

Dear Secretary Bunting,

Thank you for the opportunity to share our comments and feedback on Delaware's ESSA plan. We hope our recommendations continue to be helpful in finalizing the state's submission and in implementing the plan in the years to come. As we have shared in our first and second letters, our comments remain focused on the sections of the plan related to long-term goals and measures of student progress; accountability, reporting, supports for schools in need of improvement; and public transparency and accessibility.

We believe the state has made important improvements in the plan over the course of the last year and our coalition of community and business organizations support many of the components of this draft which align with our recommendations from previous letters, including:

1. The continued inclusion of a growth to proficiency indicator in the accountability system
2. Chronic absenteeism as an indicator of school quality
3. The inclusion of a robust measure of English Language Proficiency
4. A transparent summative star rating for schools under the Delaware School Success Framework (DSSF), and inclusion of CSI/TSI/Other designations on DSSF report cards
5. Reducing the N-size for accountability from 30 to 15
6. Identification of Comprehensive Support and Improvement Re-identified Schools (CSI-R) for schools that have been previously identified for support under other versions of the law
7. A combination of formula and competitive grant opportunities under Title I school improvement grants
8. A coherent process and timeline for school needs assessments and improvement planning
9. The requirement that CSI schools that fail to improve within the 4 year timeline, must do a new needs assessment utilizing an external partner that includes a leadership capacity review

While we applaud these improvements in the current plan, we have several remaining concerns that we hope the Department can address and revise before the April 3rd submission deadline.

Long-Term Goals and Measures of Student Progress:

The proposed long-term goals for student performance, specifically for students in underserved subgroups, allow long-term achievement gaps to persist even into 2030. We must hold high-expectations for the long-term success of all our students and ensure much more aggressive action on behalf of students that need progress the most.

In addition, the long-term goals for student performance appear disconnected from school- and district-level accountability structures – including the summative star ratings for schools and identification and exit criteria for school improvement purposes. This disconnect renders the long-term goals meaningless since schools are not required to actually meet them.

Recommendations:

- If the state decides to maintain the current methodology of reducing proficiency gaps overall and by each subgroup, then articulate significantly steeper growth trajectories for historically underperforming student groups such that gaps close at a specified time in the future and all students are held to the same long-term high expectations and high standards.
- Create a clear link and alignment between long-term goals and measures of interim progress and school ratings and school improvement identification. For example, a school's rating should reflect whether it is on-track to meet the state's long-term goals for all groups of students.

Accountability & Reporting:

The **weighting** of indicators within each accountability measure is unclear. The plan articulates proposed weights for measures as:

- Proficiency – 25%
- Growth – 30%
- Other indicators of school quality – 25%
- Graduation rate – 10%
- English Language Proficiency – 10%

However, there are several indicators within each of these measures, resulting in a lack of transparency around how each of the indicators within the broader category will be weighted. In addition, we are concerned about the following statement in the plan:

“A group of data stewards and experts representative of all LEAs in Delaware and data experts at the DDOE will model and vet the final weighting of the metrics within the DSSF.”

We believe this statement suggests that the process for weighting indicators within the DSSF will not be transparent to the public, including parents and other stakeholders.

Finally, **chronic absenteeism is the only indicator of school quality for elementary and middle schools, meaning it is weighted at 25% of a school’s overall score.** We believe this is too heavy a weight for one indicator.

In addition, **the plan sets up two parallel accountability structures:**

1. The DSSF reports and accompanying star ratings
2. The designations for school improvement: Comprehensive Support & Improvement (CSI), Targeted Support & Improvement (TSI) and Other.

While we are glad to see that both DSSF star ratings and designations of CSI, TSI, and Other will be shared in the school report cards, the two should be linked in some way such that a school designated in need of improvement (CSI or TSI) is unable to have a high star rating. We believe that if a school is designated as CSI or TSI it is not meeting the needs of its students. In the case of CSI schools, it is not meeting the overall needs of its entire population of

students; in the case of TSI schools it is not meeting the needs of a sub-group of its population. School ratings for these schools should align with those realities so that parents, community members, and the schools have accurate and honest information to improve upon.

- We support **public reporting on rates of school suspension and expulsion**, but the plan needs to more clearly articulate specifics of this reporting.
- We also support the **continued exploration of valid and reliable indicators of social-emotional learning**, for reporting use only, as was included in previous drafts of Delaware’s plan.

Recommendations:

- **Clarify and make public** any process by which weighting of indicators in the accountability system is developed, changed or finalized. Include diverse stakeholders – perhaps a subcommittee of the Governor’s ESSA Advisory Committee - in this process beyond just those at the DOE and LEAs—particularly groups like ours that represent the students we seek to serve with this plan.
- **Reduce the weighting of chronic absenteeism** as a measure of school quality for **elementary and middle schools** - for example, by **increasing the weight of elementary and middle schools’ measure of growth to proficiency** - or consider other alternatives.
- **Clearly align** school improvement designations with school summative star ratings:
 - Schools identified as **CSI should automatically receive 1 star**
 - **School identified as TSI should have their star rating decreased by 1 star** (for example, a school that might be rated as 4-stars for its overall performance, but that is designated as TSI given the performance of one or more of its subgroups should be bumped down to 3 stars.)
- Specify that rates of suspension and expulsion should be clearly reported and **disaggregated at the school-level by student sub-group as well as by type of offense and duration.**
- Explore including valid and reliable measures of social-emotional learning for reporting, and/or encourage LEAs to collect this information for diagnostic purposes.

School Improvement:

The proposed system for identifying schools for targeted support and improvement (TSI) needs to be further explained and clarified, however our **interpretation of the process is deeply troubling in that we believe it eliminates a significant number of schools** with low-performing sub-groups.

The plan doesn't **specify clear, evidence-based state strategies for turning around the lowest performing schools**, nor does it provide **specific guidance on more intensive actions/interventions** for schools that fail to improve. We believe the current plan could allow students to be underserved in those schools for several years with no recourse.

The plan states that exit criteria **for schools designated as Comprehensive Support and Improvement and Targeted Support & Improvement will be negotiated between the LEA and the DOE**. This does not provide a clear, consistent, and standard bar for schools to meet, and lacks public input and transparency.

Recommendations:

- Provide **greater clarity and a deeper explanation for the identification of TSI schools**. Ensure that any school with a sub-group of students that is performing at or below the performance of all students in the lowest-performing school gets identified as TSI (as was the case in the previous draft of Delaware's plan).
- Identify **evidence-based strategies** for school improvement that schools identified for improvement can utilize to support their turnaround efforts, including models that have proven successful in other states. Provide opportunities (including information and transportation) for students in schools identified for improvement **to easily transfer to higher performing public school options**. Consider prioritizing students most at-risk, by SES or otherwise, for these opportunities.
- **Provide clear, consistent, and publicly transparent expectations for exit criteria from CSI and TSI status**. For example, require schools reach their annual progress targets, based on the overall goals under ESSA, for two years in a row in order to be exited from status.

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We look forward to discussing these recommendations in more depth when we meet with your team in a few weeks. Thank you again for considering our feedback.