November 1, 2017

Dear Secretary Bunting,

Thank you for the opportunity to share our comments and feedback on the Delaware Report Card.

These comments are aligned with the previous three letters submitted in October, January, March by a coalition of 25 community-based and business organizations that provided feedback during the development of Delaware's ESSA plan.

We previously recommended that the state engage the public in how to present this information clearly, and we appreciate the opportunity to provide public input on how to present the information. We believe the state should use the opportunity within ESSA to provide greater transparency to the public on the performance of Delaware schools. As we approach this effort, and in our previous letters, we have supported principles of: equity; transparency; simplicity; and action.

In terms of reporting, we continue to recommend:
- 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. 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.
- 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**.
- 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**.

In terms of accountability, we continue to recommend:
- 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 sub-group's performance. This approach is difficult to understand and 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.**
- In addition, all **low-performing sub-groups of students should be considered and weighted in overall school ratings and should be communicated on the same display page as school's rating.**
- **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.

- When identifying schools for comprehensive support & improvement and targeted support & improvement, **Delaware should consider the performance of ALL schools, not just Title I schools.**
- **Finally, districts should be held accountable to the overall portfolio of schools within their management and oversight.**

The table below provides detail on our recommendations for the report card, building on our previous recommendations.

General Reporting Category	Description	Recommendations of high-priority information to be included in Delaware Report Card
Enrollment	Number of students enrolled in preschool programs	State report card should include all students enrolled in preschool programs, disaggregated by type of program, age, group, duration, and student sub-group*.
Student behavior	Expulsion rates	Data should be disaggregated at the school-level by student sub-group*, as well as by type of offense and duration. Do not exclude students with disabilities.
	In-school suspension rates	Data should be disaggregated at the school-level by student sub-group *, as well as by type of offense and duration. Do not exclude students with disabilities.
	Out-of-school suspension rates	Data should be disaggregated at the school-level by student sub-group*, as well as by type of offense and duration. Do not exclude students with disabilities.
	Referrals to law enforcement	Data should be disaggregated at the school-level by student sub-group*.
	Incidents of violence	Data should be disaggregated at the school-level by student sub-group*. Data should be disaggregated by basis of the incident of violence, bullying, and harassment e.g.: sex, disability, race/ color/ county of origin.
College and/or Career preparedness	Number and percentage of students enrolled in accelerated coursework to earn postsecondary credit while still in high school – Advanced Placement; International Baccalaureate	The state should report the number of students earning a qualifying score in addition to the number of students enrolled.
Information about educational staff	Education level; Average teacher salary; Retention; Experience; Inexperienced; Out-of-field; Emergency/ provisional credentials	The state should include educator effectiveness as a variable for reporting. This information will already be collected and reported to the feds under the Teacher Equity Report. The state should report to the community on the same Delaware Report Card dashboard the percentage of inexperienced/experienced, in-field/out-of-field, and ineffective/highly effective teachers, and the rate that

General Reporting Category	Description	Recommendations of high-priority information to be included in Delaware Report Card
		students of color and low income students taught by these categories.
Financial information	per pupil expenditures of federal, state, and local funds, disaggregated by source, for each LEA and school for the preceding fiscal year (including "actual" personnel and non-personnel expenditures)	Financial information should be reported within the context of the needs of each school and district, as defined by rate of EL, low-income, and special education students.

* In all cases, recommended disaggregation by sub-group include race/ethnicity, ELL status, special education status (504 plan, IDEA), low-income status, and gender.

Moving forward, we believe this series of community conversations is important but not sufficient for incorporating community and public feedback. Stakeholders should be included in the process by which cut scores are determined and the weighting of indicators in the accountability system and report cards are developed, changed, or finalized. We recommend a diverse group – perhaps a subcommittee of the Governor's ESSA Advisory Committee – be included in the process with those at the DOE and in LEAs.

Respectfully submitted by,