



## Analysis and Comments to Connecticut's ESSA Draft Plan

Connecticut has indicated its intent to submit a Consolidated State Plan to the U.S. Dept. of Education on April 3, 2017.

Draft Plan:

[http://www.sde.ct.gov/sde/lib/sde/pdf/essa/draft\\_ct\\_consolidated\\_state\\_essa\\_plan.pdf](http://www.sde.ct.gov/sde/lib/sde/pdf/essa/draft_ct_consolidated_state_essa_plan.pdf)

Comments must be submitted by February 27, 2017 via the survey at

[https://sde.ct.gov/sde/lib/sde/pdf/essa/draft\\_ct\\_consolidated\\_state\\_essa\\_plan.pdf](https://sde.ct.gov/sde/lib/sde/pdf/essa/draft_ct_consolidated_state_essa_plan.pdf)

The analysis, comments and recommendations in this document focus on those issues most critical to subgroup accountability and to students with disabilities. The page numbers referred to in this document reflect the page number noted on the bottom of the pages of the draft plan, not the pdf page number. Citations are to Federal ESEA regulations.

### Academic Achievement (page 1)

- CT's approach to academic achievement (growth) does not comply with ESSA regulations, which state at §200.13:

(a) *Academic achievement.* (1) Each State must, in its State plan under section 1111 of the Act—

- (i) Identify its ambitious State designed long-term goals and measurements of interim progress for improved academic achievement, as measured by the percentage of students attaining grade-level proficiency on the annual assessments required under section 1111(b)(2)(B)(v)(I) of the Act, for all students and separately for each subgroup of students described in § 200.16(a)(2);

**While a state may set goals for student growth, such goals must be in addition to, not in place of proficiency on state assessments.**

- The technical report states that the growth model applies only to grades 4 through 8. ESSA requires administration of state assessments in grades 3 through 8 and once in grades 9 through 12. **How will the state set goals for grade 3 and HS?**
- **There should be a commitment added to the plan to hold targets steady; not reset downward when/if actual performance falls short of the targets. Constantly re-setting targets renders the long-term goal meaningless.**

**Graduation Rate (page 4)**

The approach used for setting 4-year ACGR goals is admirable! Instead of using a gap-cutting approach, the state proposes to get all students to the same ACGR (94%) by 2028-2029. This approach requires significant improvement for the Students with Disabilities (SWD) subgroup – *more than 2 percentage points per year.*

Note, however, that CT has increased its 4-year ACGR for the SWD subgroup by **only 4 percentage points over the first five years** that the ACGR calculation has been required by Federal regulation. (See table below.) Five year ACGR data for all states is available [here](#). As with academic assessment goals, the state should commit to maintaining the graduation goals rather than adjusting downward when actual performance falls short of the interim targets. Such an approach renders the goals essentially meaningless.

**Regulatory Adjusted Cohort Graduation Rate (ACGR), Children with Disabilities**

State	2010-2011	2011-12	2012-13	2013-14	2014-15
CT	62	64	65	65	66

ESSA requires goals for extended year cohorts to be more rigorous than the 4-year goal because the students have had a longer time in which to graduate. (Regulation §200.13 (b) (2) (ii))

**However, the CT draft plan sets a 6-year ACGR goal of 94% - the same as the 4-year goal. The plan also states that the extended year ACGR goal only applies to the “High Needs” group. ESSA requires extended year ACGR goals to be set for each student subgroup (e.g. disability subgroup), rather than combining subgroups as a High Needs group.**

**Consultation (page 8)**

The narrative in this section does not provide any evidence that the state meaningfully consulted with the specific stakeholders required by ESSA. Appendix A indicates that the Parent Training and Information Center (PTI) and the Community Parent Resource Center (CPRC) in CT were invited to participate in focus groups. **The Executive Directors of the state’s PTI and CPRC confirmed that neither attended a focus group nor were consulted in any way regarding the state’s draft plan.**

## **Academic Assessments (page 26)**

ESSA requires states to define “students with the most significant cognitive disabilities” for IEP team guidance on making decisions about which students will participate in the state’s alternate assessment aligned with alternate academic achievement standards. Also, ESSA sets a cap on the number of students who may participate in an alternate assessment in the state at 1% of all students in the assessed grades (combined). While not a required part of the state plan, CT should address the definition of students with the most significant cognitive disabilities and strategies the state will employ to not exceed the 1% cap on alternate assessments in the plan and encourage stakeholder input.

It is critically important to ensure that the alternate assessment is used only for those students for whom the test was designed and field-tested and does not inappropriately lower achievement expectations for students who should take the general assessment. It is also important for the definition of students with the most significant cognitive disabilities to acknowledge that these students are working on the grade level content standards, even though the achievement expectations are different those for the general assessment.

## **Accountability System (page 30)**

CT’s list of indicators raises several questions:

Academic indicators (1, 2, 8)

- ESSA requires **separate** indicators for academic achievement, academic progress, 4-yr graduation rate, progress in achieving English language proficiency. Therefore, combining academic growth and progress in English language proficiency into a single indicator does not satisfy ESSA requirements.
- The graduation rate indicator must include the 4-year ACGR and may take into consideration an extended year ACGR. Therefore, indicator 9 does not comply with ESSA. Rather, it should be part of the graduation rate indicator.

Non-academic indicators (7 in total - 4, 5, 6, 7, 10, 11, 12):

- Does each of these non-academic indicators meet the requirements for indicators of school quality or student success in regulation §200.14(c)? For example, each measure within an indicator must be valid, reliable, and comparable across all local education agencies in the state, and be able to be disaggregated by each subgroup of students.
- Are there so many indicators that none will have any real meaning sufficient to drive improvement?

## Weighting

**The pie chart on page 33 is very confusing! If the numbers listed for each indicator are the values of the indicators, the total is 1450, making it impossible to ascertain the relative value of each indicator in the accountability system.**

ESSA requires that the academic indicators must weigh **substantially more** than the indicator(s) of school quality/student success. (Regulation §200.18 (b)(1)-(2)) Using the values of each indicator on the pie chart, the academic indicators would only account for 62% of the overall system (900 of 1450). Such a weighting would not meet the requirement of “substantially more” weight.

## Subgroups (page 33)

CT states that it plans to count previous SWDs in reporting on academic achievement for 2 years following their year in special education. **In this case, the state must adhere to the requirements in regulation §200.16 (b) and should affirm this in the state plan.**

CT will lower its minimum subgroup size from 40 to 20. **The state must provide information regarding the number and percentage of all students and students in each required subgroup for whose results schools would not be held accountable in the system of annual meaningful differentiation (separately for academic achievement and graduation). (Regulation §200.17 (a)(3)(iv)) This information is not included in the draft plan.**

## District and School Categories (page 38)

### Participation Rate

CT draft plan states:

**“Participation Rate:** Schools that would otherwise be categorized as 1 or 2 will be lowered a category if the participation rate in the state summative assessment in any subject for either the all students group or the high needs group is less than 95 percent.” (Page 38) (Note: The High Needs Group is an unduplicated count of students who are from a low socioeconomic background, an English learner, or a student with a disability. “Unduplicated count” means that the student counts only once, even if he/she is in multiple subgroups (e.g. for race, poverty and disability). Being in multiple categories often has an increased impact on student achievement, which is why it is important to count the student in every subgroup to which he or she belongs.)

ESSA requires states to measure the “annual measurement of achievement” for all students and for each student subgroup separately in reading/language arts and math. (Regulation §200.15 (a)(2)) **Therefore, CT’s plan to only measure participation for the “high needs group” does not comply with ESSA.**

**ESSA requires states to factor the participation requirement in one of four ways. It is unclear and uncertain whether lowering the school's rating by one category satisfies this requirement. Furthermore, the state must provide information on how it will support schools that fail to meet the 95% participation rate for all students or any subgroup (Regulation §200.15 (c))**

#### **School Identification (page 40)**

The draft plan states: **“Comprehensive Support Schools (Turnaround):** In 2018-19, these will be schools whose three-year average of the accountability index is in the bottom 5 percent of all schools statewide. In addition, schools with six-year adjusted cohort graduation rates for all students that are less than 70 percent in each of the three most recent cohorts will also be identified for comprehensive support.”

ESSA requires states to identify for Comprehensive Support and Improvement (CSI):

- The bottom 5% of Title I schools. **If the state elects to identify additional (non-title I) schools, it must ensure that the bottom 5% of title I schools are included in those identified.**
- High schools with a 4-year ACGR of 67% or less. **States may not use the extended year ACGR for identification of comprehensive support and improvement schools.**
- Chronically Low-Performing Subgroup. Any Title I school identified for targeted support and improvement that did not improve over a state-determine number of years.

**The final plan must reflect the ESSA requirements for identification of schools for CSI.**

The draft plan states: **“Targeted Support Schools (Focus):** In 2018-19, these will be schools in the bottom 10 percent of all schools statewide based on the average percentage of target achieved by high needs students in English language arts (ELA) or mathematics (i.e., matched student cohort growth – Indicator 2) in each of the prior three years. In addition, schools with six-year adjusted cohort graduation rates for the high needs group that are less than 70 percent in each of the three most recent cohorts will also be identified for targeted support”

ESSA requires states to identify for Targeted Support and Improvement (TSI):

- Any school with one or more *consistently underperforming subgroups*. Therefore, use of the “high needs student group” for this purpose does not comply with the Act.
- Any school in which one or more subgroups of students is performing at or below the performance of all students in the lowest performing schools (referred to as *low-performing subgroups*).

**Use of the “high needs group” does not comply with ESSA.**

**ESSA does not require identification of another group of schools (ie, bottom 10 percent)**

**The final plan must reflect the ESSA requirements for identification of schools for TSI.**

The draft plan states: **“Recognition – Schools of Distinction:** These are schools in categories 1, 2 or 3 that are in the top 10 percent in any of the following four categories *and* are not flagged as having an achievement gap, a graduation rate gap, or participation rate below 95 percent on the state summative assessments.

1. Overall Performance (top 10 percent of accountability index)
2. Growth – All Students (top 10 percent on points earned for All Students for indicator 2)
3. Growth – High Needs (top 10 percent on points earned for High Needs Students for Indicator 2)
4. Overall Improvement – Schools without Indicator 2 growth only (top 10 percent of rate of improvement on the Accountability Index from one year to the next)”

**ESSA does not require identification of schools of distinction. However, here again the use of the High Needs group should be questioned.**

### **Supporting All Students (page 56)**

#### **Title I, Part D: Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk**

**Students with disabilities are over-represented in correctional facilities. Therefore, CT should state specifically how it will ensure that students in such facilities are provided with special education and related services as needed as well as how child find will be carried out.**

In response to the question:

Does the SEA intend to use funds from Title IV, Part A or other included programs to support strategies to support LEAs to improve school conditions for student learning, including activities that create safe, healthy, and affirming school environments inclusive of all students to reduce:

- i. Incidents of bullying and harassment;
- ii. The overuse of discipline practices that remove students from the classroom; and
- iii. The use of aversive behavioral interventions that compromise student health and safety?

**CT provides an overly broad answer with no specificity regarding students with disabilities who are disproportionately impacted by bullying, harassment, discipline practices and aversive behavioral interventions. CT should be encouraged to provide more specifics regarding SWDs. In addition, in both the Supporting Excellent Educators and Supporting All Students sections of the plan ct should discuss building capacity for and the implementation of Universal Design for Learning (UDL) ([www.udcenter.org](http://www.udcenter.org)) and inclusive best practices. Both UDL and Inclusion have been shown to improve student outcomes for students with and without disabilities. There is one mention of UDL on page 50 of the plan.**

## Consolidated State Plan Assurances

**Coordination** – The state indicates that it has coordinated the state plan with other statutes including the IDEA. **However, there is no mention of the State Systemic Improvement Plan and how that plan will be integrated/coordinated with other provisions of the ESSA plan.**

**Appropriate identification of children with disabilities** – The plan should include specific mention of identification of children in correctional facilities.

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See ESSA resources at <https://www.ndscenter.org/political-advocacy> (click on policy documents and webinar archives)

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