



Analysis of New Hampshire's First Draft of the Every Student Succeeds Act (ESSA) Consolidated State Plan

June 18, 2017
(Revised)

New Hampshire (NH) recently released a draft of its plan at <https://www.education.nh.gov/essa/documents/state-plan.pdf>. There is a survey that is open through June 23, 2017 at <https://www.surveymonkey.com/r/J3NPZC9>. In addition, comments may be sent by email to ESSAcomments@doe.nh.gov through July 7, 2017.

Changes made to this draft of the plan should appear in **redline** in the next draft to make it easier for stakeholders to provide input on the amendments.

The analysis that we provide in this document focuses on those issues most critical to subgroup accountability and to students with disabilities (SWDs). 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.

PLAN TEMPLATE. On March 13, 2017, the Secretary of Education released a new template for states to use to submit their ESSA plan applications. The new template can be found on this webpage, along with other explanatory materials <https://www2.ed.gov/admins/lead/account/stateplan17/plans.html>.

Meaningful Stakeholder Consultation

ESSA requires the state to conduct outreach and get input from stakeholders, including parents, for the development of this draft plan. This recent template from ED does not require a description of how the stakeholder consultation was achieved, in spite of the fact that the law requires the plan to contain such a description. Almost all stakeholder groups, including the National Governor's Association, have called for state plans to incorporate this information. **NH should add a section to**

the next draft of its plan, which describes its meaningful stakeholder consultation process, including how it consulted with parents of students with disabilities and disability organizations.

Assessments (page 4)

Universal Design for Learning

States are required to develop their assessments using the principles of universal design for learning (UDL). Unfortunately, the March 2017 state plan templates provided by the U.S. Department of Education (ED) does not require a discussion on how the state is meeting this requirement. However, that does not absolve the state from its responsibility to meet the UDL requirements in the law as it develops its assessments. We are pleased to see that on page 49 NH makes a commitment to use UDL for assessments:

“Use the UDL framework as the base for the design and implementation of a set of high-quality student academic assessments in mathematics, reading or language arts, and science to support the learning needs of all students, including children with disabilities, English language learners, and those with accelerated learning needs.”

Alternate Assessments

ESSA requires states to define “students with the most significant cognitive disabilities.” This definition is to be used in IEP team guidance regarding which students meet the criteria for participation 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, the NH should list the strategies the state will employ to not exceed the 1% cap on alternate assessments. Also, NH should create a process for stakeholder engagement when it develops its definition of students with the most significant cognitive disabilities, including input from parents and organizations representing these students. (Additional information on this is available in this NCEO document at <https://nceo.umn.edu/docs/OnlinePubs/NCEOBrief12OnePercentCap.pdf>.)

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 not the same as for students taking the general assessment.

Subgroups (page 10)

In NH, the racial/ethnic student groups are American Indian or Alaskan Native, Asian or Pacific Islander, Hispanic, Black, White, Multi-Race.

NH also includes the following student groups in its accountability system, as required by ESSA:

- Economically Disadvantaged
- English Learners
- Students with Disabilities

N-Size (page 11)

N-size (minimum subgroup size) is critically important. If it is set too high many schools will not be held accountable for the disability subgroup because there are not enough students with disabilities at the school, (in the assessed grades for assessment proficiency and in the graduating class for graduation rate), to equal or exceed the N-size. For example, if the state uses 30 for the N-size, a school that has 29 students with disabilities in the assessed grades (e.g. grades 3-5 combined for an elementary schools) will not have to include the disability subgroup in any accountability determinations related to assessments. This means that the school will not be identified for targeted support and improvement for a consistently underperforming disability subgroup, even if that would have happened had the N-size of 30 been met. Similarly, a high school with less than 30 students with IEPs in the graduating class will not be held accountable for the graduation rate of the disability subgroup.

NH will use an N-size of 11 for accountability purposes (e.g. assessment proficiency and graduation rate) and an N-size of 40 for calculating assessment participation.

ESSA requires states to describe in their plans how the N-size was determined by the state in collaboration with teachers, principals, other school leaders, parents, and other stakeholders. The NH plan says the N-size of 11 was established 10 years ago and the NH ESSA Accountability Task Force reviewed the N-size of 11 and reached a consensus. There is no evidence that stakeholders were provided an analysis of the impact of various N sizes on the percentage of schools that would not be accountable for the disability subgroup for assessment and graduation rate and the number of students with disabilities in the state who would not be part of the accountability system for both assessment and graduation with that N size. **However, we are more concerned with the N-size of 40 for participation rate. There is no mention in the plan of stakeholder input in the determination of that N-size or whether stakeholders were provided an analysis showing its impact on the calculation of the participation rate, e.g., how many schools will not be accountable for test participation based on the N-size of 40. Without information on the impact of N-sizes on accountability, stakeholders cannot be informed participants in the determination as required by ESSA.**

Prior to the next draft of the plan NH should provide stakeholders with an impact analysis of an N-size of 40 with respect to determining whether schools have met the 95% participation rate requirement.

Long-term goals (page 13)

ESSA requires that states set long-term goals and interim measures for all students and for each student subgroup (e.g. disability subgroup) for academic achievement, graduation rate and English language proficiency. ESSA also states that for students who are behind, the goals and interim measures of progress must take into account the improvement necessary to make significant progress on closing statewide proficiency and graduation rate gaps.

NH intends to update the baseline data after the Spring 2017 administration of the Smarter Balanced Assessments and 2021-22 as the end of the first long term goal period and then every year set a new long-term goal for the subsequent year (e.g. in 2017-18 school year a long-term goal will be set for 2022-23 and so on). The plan states that this methodology allows the long-term goals to be adjusted to reflect the rapidity with which schools and subgroups are making progress toward achieving the end goals. Unfortunately, this methodology also allows the state to adjust the goals downward every year if subgroups are not making sufficient progress toward the current goal. **Constantly re-setting targets like this renders the long-term goals meaningless. NH should make a commitment not to reset goals and interim targets downward when/if actual performance falls short of the targets.**

Academic Achievement

NH intends to update the baseline data after the Spring 2017 administration of the Smarter Balanced Assessments. **There is no mention of what is happening with the baseline data for students who take the alternate assessment.**

The long-term subgroup goals, established for the 2024-25 school-year, are disturbingly low—especially for students with disabilities, English learners and Black and Hispanic students. The plan states that these goals were based on prior performance and represent larger relative gains for student groups that were furthest behind. However, the goal of ESSA is to accelerate improvements, not replicate them, particularly for students who historically underperform. Major changes need to be made in the NH education system to ensure that there are much greater gains in proficiency for these subgroups than are reflected in these proposed goals, which may never result in significant gap-closing for subgroups including the disability subgroup. NH should set the same proficiency rate long-term goal for all subgroups without any adjustment downward when/if actual performance falls short of the targets. Constantly re-setting targets renders the long-term goal meaningless.

NH should take note of the June 13, 2017 interim feedback letter sent to the Delaware Dept. of Education (DDOE) by the U.S. Dept. of Education (ED) regarding the academic achievement goals set out in Delaware’s ESSA state plan submitted to ED in April 2017. That letter states:

“In its State plan, DDOE proposes to decrease the percentage of non-proficient students in each subgroup by 50% by 2030, which would result in no more than half to two-third of certain subgroups of students achieving proficiency. Because the proposed long-term goals for academic achievement are not ambitious, DDOE must revise its plan to identify and describe long-term goals that are ambitious for all students and for each subgroup of students.”

(Full letter is available at <https://www2.ed.gov/admins/lead/account/stateplan17/deprelimdetermltr.pdf>)

Given that the NH goals for academic achievement are far less rigorous than those proposed by DDOE, they are likely to be rejected by ED. Thus, review and revision prior to plan submission would appear to be prudent.

Graduation Rate

NH plans to use 5-year extended year graduation rate, in addition to the 4-year Adjusted Cohort Graduation rate (ACGR) graduation rate. **Extended graduation rate goals are permitted by ESSA, but take the emphasis off of on-time graduation. Extended graduation rate goals are supposed to be more ambitious since students have a longer time to meet graduation requirements. However, NH plans to combine the 4- and 5- year rates into a single goal for each student group, which is not permitted by law. ESSA requires states to establish long-term goals separately for the 4-year ACCGR and any extended-year ACGR that the state plans to include in its accountability system. In addition, we have to ask how NH plans to reach the graduation rate goals when the goals for proficiency in math and English language arts are so low. NH should set the same graduation rate long-term goals for all subgroups without any adjustment downward.**

Indicators (page 24)

Certain indicators will be used to provide meaningful differentiation between schools for the accountability system. How well or poorly schools do on the measures for these indicators (for all students and each subgroup) will determine if they are identified for **comprehensive** or **targeted support and improvement**. The indicators will also be the basis for the information that is reported for each school. Most of the indicators and their measures are required by ESSA, others are left to state discretion. These distinctions are critically important. States are

required to add at least one indicator of School Quality or Student Success to the indicators defined by ESSA. These are referred to as the non-academic indicators. Although they are supposed to be linked by evidence to improved academic outcomes, they are not direct academic indicators like those required by the statute, which measure achievement, growth, graduation rate and English language proficiency.

Academic Achievement: NH plans to measure the Academic Achievement indicator using student performance on the Smarter Balanced Assessment for grades 3-8 and the SAT in High School. However, the academic achievement for schools participating in NH's Performance Assessment of Competency Education (PACE) pilot will use the results of the Smarter Balanced and SAT assessments in grade 3 ELA, grade 4 math, grade 8 ELA and math, and grade 11 ELA and math, respectively. In all of the other tested grades and subjects, the academic achievement will be based on the results of the PACE assessments. **The NH plan does not discuss how the performance of students who take alternate assessments will be counted for the Academic Achievement indicator.**

NH plans to use a 1-4 scale for academic achievement. The plan says that the system provides incentive to move students up through the levels and rewarding schools for having students score in the highest achievement level does not mask the performance of low-scoring students. **However, the next draft should more fully explain what each of these four levels means with respect to proficiency and how many points are provided at each level, so stakeholders can determine if the index is appropriate.**

Other academic indicator: NH is planning to use student growth for this indicator that applies to elementary schools and middle schools. To measure growth, NH plans to use student growth percentiles (SPG). SGP describes a student's academic progress from one year to the next compared to other students with similar prior test scores (called academic peers), when the tests are actually designed for comparing students to performance standards in a specific subject area. **Use of SGPs is highly questionable as reported in the research brief, Why We Should Abandon Student Growth Percentiles, by the Center for Educational Assessment at the University of Massachusetts Amherst (https://www.umass.edu/rempe/pdf/CEAResearchBrief-16-1_WhyWeShouldAbandonSGPs.pdf).** Growth towards the standard is a preferable measure for public reporting and as a metric in the state's accountability system regarding student growth.

Graduation Rate: NH plans create a 1-4 level index for graduation rate using the 5-year ACGR.

School Quality or Student Success Indicator (SQSS): NH is using an SQSS indicator that is intended to focus attention on the lowest-performing students. Mean SPGs will be used for the lowest quartile of achievers as measured by the prior year's assessment. **We applaud the concept of focusing attention on these students and incentivizing schools to provide the supports and interventions they need to help them grow at a faster rate because they are further behind. However, we question whether mean SPGs is an appropriate measure to use as discussed earlier. Also, this is an academic indicator, not a SQSS indicator, and should be built into the "other academic indicator."**

NH plans to use Career and College Readiness (CCR) as an additional SQSS indicator for High Schools. All graduating seniors will be eligible as counting as postsecondary ready by meeting two of the nine following requirements:

- Completion of a NH Scholars program of study (Standard, STEM, or Arts)
- A grade of C or better in a dual-enrollment course
- SAT scores meeting or exceeding the college and career ready benchmark (480 in Evidence-Based Reading and Writing and 530 in Math).
- ACT scores meeting or exceeding the college and career ready benchmark (18 in English, 22 in Mathematics, 22 in Reading, and 23 in Science).
- A score of 3, 4, or 5 on an AP exam | A score of 5, 6, or 7 on an IB exam
- Earning a CTE industry-recognized credential
- Completion of NH career pathway program of study
- Scoring at least Level III on components of the ASVAB that comp

The total number of graduating seniors meeting at least one of these requirements will be divided by the total number of students in the cohort to form the career and college ready index for schools. If the "cohort" for this calculation is all graduating seniors then this indicator will leave out many students with disabilities and therefore is unacceptable. The "cohort" should be the same used for calculating the ACGR.

Annual Meaningful Differentiation of Schools (page 30)

NH will differentiate schools into the following categories using performance on all the indicators and the entry and exit criteria for Targeted and Comprehensive Support and Improvement:

- Not identified
- Identified for Targeted Support and Improvement for Consistently Underperforming Subgroups (TSI-CUS)
- Identified for Targeted Support and Improvement for Low Performing Subgroups (TSI-LPS)
- Identified for Comprehensive Support and Improvement (CSI)

Weighting of indicators (page 31)

For elementary and middle schools NH plans to give Growth a weight of 60% as compared to 40% for Academic Achievement (measured by proficiency on assessments) to determine whether a school is in the lowest performing 5% of Title I schools. **We believe that achievement on assessments and graduation rates should be weighted more heavily than other academic indicators (such as growth) since they are the academic indicators most directly aligned to positive post-school outcomes.**

For high schools NH plans to identify schools as the lowest 5% of Title I high schools based on Academic Achievement (measured by assessments) with a weight of 60% and College and Career Readiness with a weight of 40%. **ESSA requires states to identify ALL high schools graduating 67% or less of students without regard for Title I status. Additionally (not in lieu of) any high schools receiving Title I funding that are in the lowest 5% of all Title I schools would be identified for CSI. These two determinations are separate and distinct.**

Different Methodology for Certain Types of Schools (page 33)

The NH plan indicates that the state will not use a different methodology for annual meaningful differentiation for any of its schools.

Identification of Schools (page 33)

Comprehensive Support and Improvement (page 34)

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 that fail to graduate a third or more of their students. The regulations that were repealed in March 2017 required that the 4-year Adjusted Cohort Graduation Rate be used for this purpose. Without the regulations states are permitted to use longer graduation rates (e.g. 5 year), but it should be discouraged because it removes the emphasis on on-time graduation.
- Chronically Low-Performing Subgroup. Any Title I school identified for targeted support and improvement because of low performing subgroup(s) that did not improve over a state-determine number of years.

Lowest 5% of Title I Schools: As stated earlier, it is not clear how graduation rate will factor into the identification of a high school as one of the lowest 5% of Title I schools.

Public high schools failing to graduate at least one-third of its students: The NH draft plan provides that all Title I schools that have a graduation rate below 67% will be identified for CSI. **This is unacceptable because ESSA states that this**

category applies to all high schools not just Title I high schools. This error also appears on page 33 in the section on the weighting of indicators.

We are also concerned that the 5-year graduation rate is the only one that seems to be used for the graduation rate indicator. We encourage states to focus only, or at least primarily, on the 4-year adjusted cohort graduation rate for CSI, rather than including extended rates, in order to keep the focus on on-time graduation. We are, therefore, especially concerned that NH plans to use the 5-year graduation rate in lieu of the 4-year graduation rate.

Frequency of Identification: ESSA states that schools must be identified for CSI at least once every three years. **NH has decided to adhere to this minimum requirement, whereas some other states are electing to identify schools more frequently.**

Targeted Support and Improvement (page 35)

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

- Any school with one or more consistently underperforming subgroups
- Any school in which one or more subgroups of students are performing at or below the performance of all students in the lowest performing schools (referred to as low-performing subgroups).

Consistently underperforming subgroups:

The NH draft plan's provides the following description of schools with a consistently underperforming subgroup or subgroups:

"A consistently underperforming subgroup is defined by meeting ALL of the following criteria for any indicator:

- i. The subgroup does not meet its interim target on achievement, graduation rate, and/or English language proficiency AND the all students group in the same school meets its interim target; AND
- ii. The subgroup identified in (i) above is performing below the state average for that subgroup on the same indicator for which it doesn't meet its target; AND
- iii. The Mean Growth Percentile for the subgroup(s) the most recent three year period is less than 50; AND
- iv. (i) and (ii) are true for two (2) consecutive years

We recommend that a consistently underperforming subgroup be defined as a subgroup that has not met, or is not on track to meet the state defined long-term goals or interim measures for that subgroup for two consecutive years. NH's definition makes it too difficult for schools to get targeted support and intervention. Underperformance should not be a relative measure; it should be based on how a particular subgroup at a school performs against the state goals and targets. If a subgroup that has not met, or is not on track to meet the state defined long-term goals or interim measures for two consecutive years,

the school should be identified for TSI regardless of whether the all student group met its interim targets or how the subgroup performed compared to the state average or the subgroup's growth rate.

Additional Targeted Support (schools with a low-performing subgroup or subgroups):

The NH plan states that schools that have been identified two years in a row for TSI status on the basis of consistently underperforming subgroups (TSI-CUS) will automatically be qualified for consideration for identification as: Identified for Targeted Support and Improvement for Low-Performing Subgroups (TSI-LPS). In order for a TSICUS school to be re-labeled as a TSI-LPS school, it must meet both of the following criteria:

1. Identification of TSI-CUS for two consecutive years;
- AND
2. The subgroup or subgroups that are identified as consistently underperforming, on its own, would lead to identification of the school as a CSI school meeting the criteria for the lowest 5% of Title I schools.

If the subgroup or subgroups do not meet the exit criteria for TSI-LPS for an additional two years, the school will then be identified as a CSI school.

Criteria #2, above, is the definition in the statute for a low-performing subgroup. If a school has a subgroup meets the requirements in criteria #2 it should not have to wait to be a TSI-CUS school for two years before being re-labeled as a TSI-LPS. TSI schools with low-performing subgroups are required to be identified annually. Therefore, criteria #1 should be eliminated. The way the draft plan is written it will take 2 years to be identified as a TSI-CUS school and another two years to be identified as a TSI-LPS school and then another two years to be identified as a CSI school. This is too long for a school with a chronically low-performing subgroup or subgroups to wait for a CSI plan.

Annual Measurement of Achievement –At least 95% Participation Rate Requirement (page 36)

ESSA requires that at least 95% of all students in the assessed grades (and at least 95% of each subgroup - including the disability subgroup) must be included in the state's annual assessments. It is important to keep in mind the impact of the participation rate requirement on students with disabilities. A "non-punitive" approach would likely led to widespread exclusion of historically underperforming subgroups-similar to the situation that existed prior to the No Child Left Behind Act (which was replaced by the Every Student Succeeds Act).

NH's draft plan states that school report cards will flag when a school fails to meet the 95% participation rate rule for state or PACE assessments (the innovative assessment pilot) and that the schools will be required to submit a plan for

community engagement. The plan also states that the denominator in calculating the achievement index will be the number of students participating in the state or PACE assessments, or 95 percent of the full academic year enrollment, whichever is greater. This calculation is a requirement in ESSA. **However the NH plan does not discuss how the failure of a school to meet the 95% participation rule will factor into the accountability system, which is an additional requirement in the law and a question asked in the application template. The state accountability system is the annual meaningful differentiation of schools as it relates to identifying schools for TSI or CSI. It is appropriate to require a school that does not meet the 95% rule to develop a community engagement plan to increase participation, but that step by itself does not factor the failure to meet the 95% participation requirement into the accountability system under ESSA.**

We believe the appropriate impact on the accountability system is that a school should not get a satisfactory rating for any year the participation requirement is not met for any subgroup. NH can also consider the options in the ESSA accountability regulations regarding how to factor the failure of schools to meet the participation rate requirement into the accountability system. Even though Congress repealed these regulations in March, they still provide excellent guidance on many difficult ESSA implementation issues.

Although we are pleased that NH will require community engagement plans to help schools increase assessment participation, we want to point out that parents of students in the subgroup or subgroups for whom the requirement was not met should be included in the plan development process.

Exit Criteria for CSI and TSI Schools (page 37)

We are pleased that the NH plan requires that a TSI or CSI school will not exit from TSI or CSI status until it does not meet the TSI or CSI entrance criteria that caused the identification for two consecutive years.

More Rigorous Interventions for CSI Schools that Fail to Meet the Exit Criteria (page 37)

According to one sentence of the NH plan, schools identified for CSI that do not meet the exit criteria after four years, *may* be identified for more rigorous intervention. In another sentence the plan says that when schools identified for CSI fail to meet the NH's exit criteria within a State-determined number of years, more rigorous interventions *will* be required. **Does this discrepancy mean that the time frame for more rigorous intervention to be required in NH is longer than four years? If so, that would be an excessive time frame. Also, the state-determined number of years should be provided in the plan.**

The plan discusses the amended CSI plan that will be required for these schools based on a needs assessment and states that these plans must include one of the following actions:

- “1. The implementation of a tiered instructional model;
2. The addition of at least one strong or moderate evidence based intervention;
3. Entering into a partnership with a mentor school who has successfully implemented evidence based interventions that have led to increased student achievement.

Schools who must write an amended plan will also consider school-level operations such as changes in school staffing and budgeting, as well as extended day or year instructional services.”

We recommend that the actions taken for Title I schools that have CSI plans because of chronically low-performing subgroups be targeted at the subgroup or subgroups that caused the identification. We also would like to see a more robust response to the question asked in this section of the template about the interventions that would be required for these schools, including a discussion of interventions that would improve achievement for students with disabilities.

Technical Assistance (page 41)

We are pleased to see that NH mentions UDL in this section of the plan.

School Conditions (page 46)

State plans are required to describe strategies to reduce

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

NH is to be applauded for going into a great amount of detail in this section on strategies such as UDL that improve school conditions. The extensive list of UDL implementation activities on pages 48-50 is very impressive. We were also pleased to see a discussion of the laws in NH that address bullying and harassment and restraint and seclusion. We would like to see more discussion of strategies, in addition to UDL, that would reduce suspension for students with disabilities. Another important topic to address to improve school conditions for students with disabilities, which was not discussed, is improving inclusive opportunities. UDL is an important part of the success of an inclusion initiative, but it would be helpful for NH to specifically state a commitment to educating students with disabilities in the general education classroom.

Children and Youth who are Neglected, Delinquent, or At-Risk (page 62)

In the section on Title I, Part D (Prevention and Intervention Programs for Children and Youth who are Neglected, Delinquent, or At-Risk) there is no mention of students with disabilities. According to data from the National Technical Assistance Center for the Education of Neglected or Delinquent Children and Youth (<http://www.neglected-delinquent.org>) 74% of students served under Subpart 1 in NH in 2013-14 had IEPs and 42% of students served under Subpart 2 had IEPs. These rates are more than double the nationwide rates for students with disabilities. The NH plan should undertake an effort to identify causes for these significantly disproportionate rates. NH should also state specifically how it will ensure that students with IEPs in such facilities are provided with special education and related services as needed, as well as how child find will be carried out.

Supporting Effective Instruction (page 64)

Students with disabilities are not mentioned in this part of the plan, not even in the section where NH is supposed to describe how it will improve the skills of educators to provide instruction for students with specific learning needs, including students with disabilities. There are no specific initiatives discussed that would increase the inclusion of students with disabilities in general education classes. That being said, the section of the plan that addresses UDL does include activities for teacher preparation and credentialing. The UDL activities will build capacity for educators to successfully include students with disabilities in the general education classroom, but we would like to see the connection between UDL and inclusion mentioned in the plan.

Student Support and Academic Enrichment Grants (page 73)

The purpose of this program is to improve students' academic achievement by increasing the capacity of states, local educational agencies (LEAs), schools, and local communities to:

- Provide all students with access to a well-rounded education;
- Foster safe, healthy, supportive, and drug-free environments that support student academic achievement; and
- Increase access to personalized, rigorous learning experiences supported by technology.

The NH plan says very little in this section of the plan except that it intends “to gather stakeholder feedback regarding the activities and initiatives supported under this grant, and to prepare resources and materials that schools can use in their initiatives to support evidenced based practices in the following areas:

- personalized educational experiences;
- career pathways;
- dual-enrollment programs;

- multi-tiered system of support for behavior and wellness;
- technology instruction, data security and the acquisition and implementation of technology tools and applications”

The plan also says that NH will provide non-regulatory guidance to local education agencies regarding the use of funds and allowable expenditures once the final allocation numbers for the grants are known.

We encourage NH to provide much greater detail in the next draft of the plan about how it will address student support and the uses for the academic enrichment grants. It is hard for stakeholders to provide input without more transparency. We also would like to see a clear connection between the UDL language on pages 48-50 and the academic enrichment grants. On page 49 the plan includes a paragraph that discusses UDL and personalized learning. It ends with the following sentence: “Learning activities are meant to be relevant to learners, driven by their interests and self-initiated according to non-regulatory guidance, school support, and academic enrichment grants.” However, this connection is not clear enough.

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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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