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

June 21, 2017

A public draft of the ESSA plan for Georgia (GA) was released on June 15, 2017 and is available at: http://www.gadoe.org/External-Affairs-and-Policy/communications/Documents/ESSAConsolidatedStatePlan%20--%206-14A.pdf.

Comments on the draft ESSA Plan can be submitted through July 13, 2017 by using the survey at https://www.surveymonkey.com/r/95ZX7CY.

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 referenced in this document are the page numbers noted on the bottom of the pages of the draft plan (not the page numbers displayed in the Adobe Reader).

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 (referenced on page 2)

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. The GA plan mentions all its advisory committees and the involvement of parents. However, based on the membership lists for the State Advisory Committee and the six other ESSA related committees, there was no representation from disability organizations-- except for one person from the State Advisory Board for Special Education who served on the Federal Programs to Support School Improvement

Committee. We have confirmed that the GA Parent Training and Information Center (Parent to Parent of GA) was not involved in the development of this draft plan. **GA should add representation from the disability community, including the Parent to Parent of GA, on its ESSA advisory committees for the development of future draft plans and the final state ESSA plan.**

Assessments (page 6)

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. The plan does mention universal design for English learner assessments but nothing about using UDL for the rest of the state assessments.

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 GA plan should list the strategies the state will employ to not exceed the 1% cap on alternate assessments. Also, GA 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 11)

According to the draft plan "The state will continue to include in the students with disabilities subgroup former-SWD students in years 1 and 2 of monitoring. This will ensure consistency in the calculation and provide for a more stable subgroup for accountability determinations**." Including former students with disabilities in the disability subgroup for two years is no longer permitted under ESSA. The**

only provision permitting this practice was in the accountability and state plan regulations, which were repealed by Congress in March 2017. This language must be removed from the GA plan.

N Size (page 12)

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.

GA will use an N size of 15 for accountability purposes (e.g. assessment proficiency and graduation rate) and reporting of the participation rate for assessment. However, an n size of 40 will be used to determine whether the achievement calculation will be adjusted to count nonparticipants in the denominator. This is concerning because schools can have up to 39 students with disabilities who do not participate in the state assessments before there is any impact on achievement for the subgroup or students overall. An N size of 40 for this purpose could easily lead to schools encouraging the nonparticipation of low-performing students with disabilities.

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 GA plan says stakeholders were consulted about the N size through the Accountability Committee. However, there are no members of that committee who are parents or representatives from disability organizations. The plan states that the Accountability Committee was provided with impact data in order to set the minimum subgroup size of 15. However, this data was not provided to parent and disability organization stakeholders because they were not represented on the Accountability Committee. Also, we do not know if the impact data included a full 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.

Prior to the next draft of the plan, GA should make the N size analysis described above publically available (see the Ohio Department of Education's

N size topic guide for examples of the data simulations for both assessment and graduation analysis at https://education.ohio.gov/getattachment/Topics/Every-Student-Succeeds-Act-ESSA/Nsize-Topic-Discussion-Guide.pdf.aspx). Without this information parents and other stakeholders cannot provide meaningful consultation on N size determination, a requirement that is specifically referenced in the plan template. **Also, in light of the unusually high N size of 40 for assessment participation rate as it relates to calculating achievement, GA should also provide an impact analysis with respect to how this N size would impact accountability and the inclusion of students with disabilities in the assessment system. For example, provide the number and percent of schools that would not have 40 or more test-eligible students by subgroup.**

Long-term goals (page 14)

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.

GA intends to use 2017 for baseline data with a long-term goal period of 15 years. Five-year contracts will require schools to decrease the gap between baseline performance on the state accountability system and 100% by 3% annually. These annual targets will be recalculated every 5 years to account for progress, or lack thereof. The long-term goal is to close the gap between baseline performance and 100% by 45% over a period of 15 years. This is based on maintaining the 3% per year goal, which according to the plan could be adjusted downward. **The plan provides 2016 baseline data (since they don't have the 2017 data yet) for each subgroup for academic achievement and graduation rate in Appendix A starting on page 77. It is evident that decreasing the gap by 45% (or possibly less if annual targets are recalculated) would not provide the level of improvement needed for the disability subgroup. Re-setting targets like this for lack of progress renders the long-term goal meaningless. GA should make a commitment not to reset goals and interim targets downward when/if actual performance falls short of the targets.**

Academic Achievement

GA's improvement targets for achievement will be calculated based on academic achievement rates in English language arts, mathematics, science, and social studies. **GA should set the same proficiency rate long-term goal for all subgroups without any adjustment downward.**

Graduation Rate

GA should set the same graduation rate long-term goals for all subgroups without any adjustment downward.

GA plans to use a 5-year extended graduation rate, in addition to the 4-year 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. **GA's extended graduation rates are only slightly more ambitious than the 4-year rate.**

Indicators (page 22)

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.

A general concern about GA's indicator system is that, except for the Gap Closing measure, the other indicators results are to be reported by student subgroup, but it does not appear that they will included in the accountability system. The law is clear that subgroup performance must factor into the system used to determine whether schools are identified for targeted and comprehensive support and improvement. The next version of the plan must describe how the results for each subgroup will be factored into the accountability system.

Academic Achievement: GA plans to use Content Mastery (assessment proficiency scores in English language arts, Math, Science and Social Studies) and Gap Closing (based on long-term goals and interim target process) for the academic achievement indicator. To calculate the Content Mastery, points will be awarded as follows: 0.0 for Beginning Learners, 0.5 points for students who are not proficient but considered to be "Developing Learners", 1 point for "Proficient Learners" and 1.5 points for "Distinguished Learners." A point system is used for the Closing Gaps measure based on whether a school met its improvement target or whether it made progress but did not meet the targets. **It is not clear where Closing Gap measure fits in the indicator system. It should incorporated into the Content Mastery indicator since gap closing is built into the goals**

Including Science and Social Studies in this indictor is inconsistent with the language in ESSA, which states that the Academic Achievement indicator is measured by proficiency rates on the annual assessments on English/language arts (ELA) and Math. Including other subjects in the determination of performance in this indicator dilutes the importance of proficiency in ELA and Math for college and career readiness. These subjects can be used in other indicators. **GA 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 this issue. That letter states**:

> "DDOE must, for the Academic Achievement indicator required under ESEA section 1111(c)(4)(B)(i)(I), only include proficiency on the annual assessments required under ESEA subsection (b)(2)(B)(v)(I) (i.e., reading/language arts and mathematics); a State may include performance on assessments other than those required under ESEA subsection (b)(2)(B)(v)(I) (e.g., science and social studies) in the indicator for public elementary and secondary schools that are not high schools as required under ESEA section 1111(c)(4)(B)(ii) (i.e., the Other Academic indicator) for elementary and secondary schools that are not high schools or in the School Quality or Student Success indicator for any schools, including high schools."
>
> (Full letter is available at https://www2.ed.gov/admins/lead/account/stateplan17/deprelimdetermltr.pdf)

Other academic indicator: GA is planning to use student growth for this indicator that applies to elementary schools and middle schools. To measure growth, GA 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/remp/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: GA plans to use 5-year extended adjusted cohort graduation rates (ACGR), in addition to the 4-year graduation rate. Extended graduation rates are permitted by ESSA, but can take the emphasis off of on-time graduation.

The 4-year graduation rate for all students will comprise 2/3 of the weight allocated to graduation rate while the 5-year graduation rate for all students

will comprise 1/3 of the weight. This weighted index provides some emphasis on getting students graduated in 4 years – in other words, on time.

The plan states that graduation rates for subgroups will be reported, but does not seem to include this data in the graduation rate indicator for accountability purposes.

School Quality or Student Success Indicator (SQSS): GA uses numerous SQSS indicators. The plan states that there are three for elementary schools (ES), four for middle schools (MS), and five for high schools (HS). These are all part of the "Readiness " component of the system. The details are provided below. We counted three for MS, not four as stated in the plan.

- (ES, MS and HS) Literacy, measured by the percent of students demonstrating reading comprehension at or above the lower bound of the College & Career Ready "Stretch" Lexile Band for each grade level or course
- (ES, MS and HS) Student Attendance, measured by the percent of students absent less than 10% of days enrolled
- (ES and MS) "Beyond the Core," represents the percent of students earning credit in specified enrichment courses beyond the core that expose students to a well-rounded curriculum
- (HS)"Accelerated Enrollment," measures the percent of graduates earning credit for accelerated enrollment via Move On When Ready (MOWR), Advanced Placement (AP), or International Baccalaureate (IB) courses
- (HS) "Pathway Completion," which measures the percent of graduates completing an advanced academic, career/technical (CTAE), fine arts, or world language pathway
- (HS) "College and Career Readiness," measures the percent of graduates entering the Technical College System of Georgia (TCSG) or the University System of Georgia (USG) without needing remediation; achieving a readiness score on the ACT, SAT, two or more AP exams, or two or more IB exams; passing an end of pathway assessment (EOPA) (nationally-recognized industry credential); or completing a work-based learning experience

Annual Meaningful Differentiation of Schools (page 29)

GA will differentiate all public schools in the State using the indicators described previously as part of its College and Career Ready Performance Index (CCRPI). The plan says Indicator performance will be reported for all students and each subgroup of students. **It is not clear whether subgroup performance on these indicators is included in the index or merely reported. ESSA requires subgroup performance to be included in the accountability system and the state plan template requires a description of how this will happen.**
Weighting of indicators (page 29)

According to the GA plan:

> "Within the Content Mastery component, achievement indicators are weighted according to the number of tests administered in that content area. Within the Progress component, ELA and mathematics progress each comprise 45% of the weight while progress towards English language proficiency comprises 10% of the weight. The Closing Gaps component is a single indicator. Within the Readiness component, all indicators are weighted equally. Within the Graduation Rate component the 4-year graduation rate receives 2/3 of the points and the 5-year graduation rate receives 1/3 of the points. Each component is weighted and combined to produce an overall score on a 0-100 scale with the possibility of extra points for very high levels of achievement, progress, and/or improvement. This chart provides a breakdown of the relative weights of the components in the CCRPI."

	Elementary	Middle	High
Content Mastery	30%	30%	30%
Progress	35%	35%	30%
Closing Gaps	15%	15%	10%
Readiness	20%	20%	15%
Graduation Rate	--	--	15%

We have numerous concerns about this weighting system. As stated earlier the Gap Closing measure should be incorporated into the Content Mastery Indicator (the Academic Achievement indicator). Also, English language proficiency is supposed to be a separate indicator and should not be combined with math and English language arts progress for the other academic indicator. Finally, a weight of 15% for the graduation rate indicator is far too low.

Although there are many SSSQ indicators, they combine in the Readiness component to count for a relatively small percentage of the total index. However, we believe that achievement on assessments and graduation rates should be weighted more heavily than other academic indicators since they are the academic indicators most directly aligned to positive post-school outcomes

Different Methodology for Certain Types of Schools (page 30)

The GA plan indicates that they do not yet have a system for assigning a summative rating to certain schools that do not have both Content Mastery and Progress indicator data (e.g. due to N size or other reasons). GA says it intends to explore a protocol for assigning a rating to such schools, including primary and alternate schools. **The next version of the plan should include this information or it will be in violation of the law. GA cannot simply remove these schools from the accountability system.**

Identification of Schools (page 30)

Comprehensive Support and Improvement (page 47)
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: The GA plan says it will identify the lowest 5% of schools, which would appear to mean all schools (the schools identified for CSI under ESSA must include the lowest 5%, of Title I schools). Also it requires that a school have an overall CCRPI score of 60 for 3 consecutive years AND be ranked among the lowest 5% of school before being identified for CSI. **This provision makes it more difficult than the law allows for a school to be identified for CSI.**

Public high schools failing to graduate at least one-third of its students: The GA draft plan provides that schools that have a 4-year ACGR graduation rate below 67% will be identified for CSI based on graduation rate. **We are pleased to see that GA is focusing on the 4-year ACGR for CSI identification, rather than including extended rates. This puts the emphasis on on-time graduation. Please note that the identification should be for high schools with a graduation rate of 67% or lower (not below 67%).**

Frequency of Identification: ESSA states that schools must be identified for CSI at least once every three years. **GA states that schools can enter and exit CSI status annually. We are pleased to see that GA is identifying schools for CSI more frequently than the minimum required by law. However, we believe it is preferable to wait more than one year before allowing schools to exit this status in order to ensure that the improvements can be sustained.**

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 GA draft plan defines a consistently underperforming subgroup as a subgroup that fails to make progress towards meeting subgroup achievement and/or four-year graduation rate improvement targets for three consecutive years**. This definition sets too long a period for identification. 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 <u>two consecutive years</u>.**

We also do not agree that schools with consistently underperforming subgroups should be permitted to exit TSI status by merely making progress toward the applicable targets. The schools should remain in TSI status until the subgroup is meeting or on track to meet the state defined long-term goals or interim measures for two consecutive years. Our two-year recommendation is to help ensure sufficient sustained progress to meet long-term goals.

Additional Targeted Support (schools with a low-performing subgroup or subgroups): Unlike consistently performing subgroups, low performing subgroups are identified based on whether a subgroup or subgroups are performing as poorly as the "all student" group in the lowest 5% of Title I schools. Schools are identified for TSI for either consistently underperforming subgroups or low-performing subgroups, The GA plan defines a low-performing subgroup as a subgroup that fails to make progress towards meeting subgroup achievement and/or four-year graduation rate improvement targets (based on long-term goals and measurements of interim progress) for three consecutive years AND the performance rate of the identified subgroup(s) for the applicable target(s) is less than 26% for an achievement rate or 52% for a four-year graduation rate. **GA's definition does not follow the statutory definition of low-performing subgroups, which is based on a comparison to the all student group at the lowest 5% of Title I schools. Also, these schools should not be able to exit TSI because the subgroup is making progress toward meeting the applicable target. We recommend that the schools be able to exit TSI status when it no longer meets the entrance criteria described in the law for two consecutive years.**

Additional Statewide Categories of Schools (page 36)**:** The GA plans lists a few categories of schools that may still get some state support, including professional learning and targeted technical assistance, even if they are not identified for CSI. **This is a positive step towards preventing subgroup performance from deteriorating to a point that schools need CSI plans.**

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).

We are very concerned that the N size of 40 being used by GA for this purpose will leave many schools without consequences for failing to assess 95% of it students and each subgroup. The GA plans talks about how failure to meet the participation rate requirement will impact the achievement calculation. However, that is only one of the requirements regarding participation rate in the law.

The GA plan does not discuss how the failure of a school to meet the 95% participation rule will factor into the accountability system as a whole, which is a requirement in the law and a question asked in the application template. 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. GA 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.

In addition, we encourage states to require the development of improvement plans to help schools that fail to meet the participation rate rule to increase assessment participation. Parents of students in the subgroup or subgroups for whom the requirement was not met should be included in the plan development process.

More rigorous interventions (page 37):
In this section of the plan GA is supposed to state how many years a school will remain in CSI status before getting more rigorous interventions**. GA describes more rigorous interventions for a subset of CSI schools but does not describe how that subset is determined.**

School Conditions (page 44)

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

The GA plan states that the risk of being suspended between Students with Disabilities (SWD), English Learners (EL), and Economically Disadvantaged (ED) compared to their nonservice reference group will be reported and examined. It is a positive sign that GA acknowledges the greater risk for these student groups, but it is also important to require a plan to address disproportionate suspension. **This section of the ESSA plan should be built up with strategies that reduce aversive behavioral interventions and specifically improve school conditions for students with disabilities, such as inclusive best practices. In addition, a discussion of UDL should be added because it is aimed at accessible learning opportunities and reducing frustration that can lead to suspension and aversive behavioral intervention. This is just one of the many ways UDL can be used to improve CA's state plan so that it supports an fair, equitable and high quality education for all students. For more information on UDL and ESSA state plans see http://www.udlcci.org/policytwo-pagerdraft-2-3-17-update2/.**

School Transitions (page 46)

GA should add some language to its plan describing how it will ensure that all students with disabilities, including those with intellectual disabilities, will have access to the various programs described on pages 46-48. There is a section on increasing graduation rate for students with disabilities, but these students are not mentioned in any of the other transition programs.

Children and Youth who are Neglected, Delinquent, or At-Risk (page 53)

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) **27%** of students served under Subpart 1 in GA in 2013-14 had IEPs and **19%** of students served under Subpart 2 had IEPs. **The GA plan 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.**

Supporting Effective Instruction (page 55)

From pages 55 through 61, the GA draft plan describes many ways effective instruction will be supported. However, students with disabilities and special educators are never mentioned. **It is important for GA to articulate whether all these initiatives address the needs of students with disabilities and special educators. In addition, the plan should provide a commitment to critically important strategies such as promoting UDL implementation and significantly improving the capacity of educators to implement inclusive best practices.**

According to the 2016 IDEA Part B Data Display, just 19% of GA's students with intellectual disabilities are in general education classroom 80% or more of their school day. The data for students with multiple disabilities are not reported. A National Center and State Collaborative study shows that when students are being segregated from their non-disabled peers they have limited access to the grade-level general education curriculum. **http://www.ncscpartners.org/Media/Default/PDFs/Resources/NCSC%20LRE%20Article%20Exceptional%20Children%20EC%201670%20APA.pdf .The U.S. Department of Justice lawsuit against GA outlines the severe academic and safety consequences for students that are segregated in the GNET program.**

Improving Skills of Educators (page 61)
This section of the plan is supposed to describe how GA will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs, particularly children with disabilities, English learners, students who are gifted and talented, and students with low literacy levels, and provide instruction based on the needs of such students. **GA mentions a couple of initiatives such as co-teaching. As mentioned previously, we recommend that building capacity for inclusive best practices and the implementation of UDL also be addresses as strategies that will be needed to improve the skills of educators.**

Student Support and Academic Enrichment Grants (page 67)
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.

Once again there is no mention of implementing UDL, even though it helps provide access to personalized, rigorous learning experiences supported by technology; an element of this section of the law. Also, decades of research support the importance of inclusive education for providing students with disabilities access to a well-rounded education. Yet the draft plan does not describe an initiative to improve access to a quality education in the general education classroom. In fact there is no mention of students with disabilities at all in this part of the plan.

Coordination with Other Programs

ESSA requires that the state plans coordinate with other programs, such those under the Individuals with Disabilities Education Act. We were pleased to see that GA did mention its State Systemic Improvement Plan (SSIP) for students with disabilities on page 48. As part of its SSIP GA identified a State Identified Measureable Result (SiMR) that focuses on increasing the rate with which students with disabilities graduate with a regular high school diploma. On page 48, the plan says the following:

> "Georgia has developed a State Systemic Improvement Plan (SSIP) that includes a comprehensive, multiyear focus on improving results for Students with Disabilities and specifically outlines the development of strategies to increase state capacity to structure and lead meaningful change in Local Educational Agencies (LEAs). While the primary focus of the plan is on improvement for Students with Disabilities, the State must also address in its SSIP how the State will use its general supervision systems to improve implementation of the requirements of Individuals with Disabilities Education Act (IDEA). Georgia has implemented a systemic plan, "Student Success," to improve graduation outcomes for Students with Disabilities. The Georgia Department of Education will continue to engage in continuous improvement in order to evaluate and enhance the effectiveness of such programs and initiatives."

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

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