



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

June 30, 2017

A public draft of the ESSA plan for Missouri (MO) was recently released and is available at: <https://dese.mo.gov/sites/default/files/ESSAPlanDraft.pdf>.

Comments on the draft ESSA Plan can be submitted through July 15, 2017 by using online forms at <https://dese.mo.gov/quality-schools/federal-programs/essa-plan> or via email to [DESE.ESSA@dese.mo.gov](mailto:DESE.ESSA@dese.mo.gov).

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 8)**

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 the U.S. Department of Education (ED) does not require a description of how the stakeholder consultation was achieved. The MO plan mentions its regional stakeholder meetings, but not whether there was any disability representation on any committees or work groups charged with developing the state plan. **MO should add representation from the disability community on its ESSA advisory committee(s) 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 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 MO plan should list the strategies the state will employ to not exceed the 1% cap on alternate assessments. Also, MO 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 12)

The following racial/ethnic subgroups are in MO’s accountability system: Black (not Hispanic), Asian/Pacific Islander, Hispanic, American Indian/Alaska Native, White (not Hispanic), and Multi-Racial. The other subgroups in the accountability system are economically disadvantaged students, children with disabilities, and English learners.

MO will **report** on other groups including Homeless, Foster, Military Dependent, and Gifted. However, these groups will not be included in accountability determinations.

## **N Size (page 13)**

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.

**MO plans to use an N size of 30 for accountability purposes (e.g. assessment proficiency and graduation rate) and for determining the participation rate in state assessments. The N size for reporting data is 10.**

**The 2013 IES study, (The Inclusion of Students With Disabilities in School Accountability Systems: An Update available at <https://ies.ed.gov/ncee/pubs/20134017/pdf/20134017.pdf>) found that only 29.7% of MO schools were held accountable for students with disabilities using an N size of 30. Clearly, that is an unacceptable exclusion rate. Further, we know nothing about the impact of an N size of 30 on high schools for the graduation rate indicator. Presumably this N size would result in many high schools being excluded from accountability for the graduation rate of the students with disabilities subgroup. Studies show that an N size of 10 is appropriate and most states are using an N size of 20 or less (see <http://all4ed.org/wpcontent/uploads/2016/06/NSize.pdf> and <https://nces.ed.gov/pubs2011/2011603.pdf>).**

**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 MO plan says stakeholders were consulted about the N size through the Accountability Work Group. However, we were not able to find any information about this work group and whether it included representatives from the disability community. Also, we do not know if the Accountability Work Group was provided with 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 that would not be part of the accountability system for both assessment and graduation.**

**Prior to the next draft of the plan, MO 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.**

**MO should also provide an impact analysis with respect to how an N size of 30 for participation rate 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 30 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.

The MO plan identifies the timeline for long-term academic achievement and graduation rate goals as 10 years, but does not provide any information on the baseline data. There is also a statement that the relationship of the MO Assessment Program Performance Index (MPI) to proficiency rate is approximate and that the MPI, not proficiency rate (as required by ESSA), is what will be used for the setting of achievement goals. The plan states that the goal is to reduce the percentage scoring non-proficient on math and English language arts assessments and the percentage that do not graduate in 4 years by 50% over the 10 year period.

**ED has already advised one state – Delaware – that its goals, which are also based on a 50% gap reduction – are not ambitious enough. MO should take note of the June 13, 2017 interim feedback letter sent to the Delaware Dept. of Education (DDOE) by 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/depredlimdetermltr.pdf>)

**In addition, the plan states that these goals do not apply to students with disabilities because the goals for students with disabilities “are consistent with the goals found in Missouri’s IDEA implementation plan.” (Page 16)** We *assume* this refers to the State Performance Plan (SPP) required by the IDEA. The SPP includes targets for students with disabilities on state assessments in reading and math (Indicator 3C). However, the current SPP includes academic assessment proficiency targets only through 2018.

**Appendix A (Pages 65-68) includes long-term goals and measures of interim progress for students with disabilities. However, these goals are not based on the methodology that MO is using to establish goals for all other groups of students (i.e. reduce the percentage scoring non-proficient on math and English language arts assessments and the percentage that do not graduate in 4 years by 50% over the 10 year period.) In fact, if the same methodology were applied to the goals for students with disabilities, the amount of progress would be significantly more (roughly 65% proficiency in ELA and 61% proficiency in Math).**

**Therefore, this presents three very serious problems regarding the long-term goals for students with disabilities, which are:**

- 1. The alternate methodology used to set the long-term goals and measures of interim progress for students with disabilities in Appendix A is not provided.**
- 2. Establishing goals for students with disabilities that are substantially less ambitious than all other subgroups of students likely violates ESSA’s provision at Sec 1111 (c)(4)(A)(III).**
- 3. Establishing goals for students with disabilities that are substantially less ambitious than all other subgroups of students—solely by reason of their disability—is likely a violation of these students’ rights under Section 504 of the Rehabilitation Act of 1973 ( 29 U.S.C. § 794) since it deprives students with disabilities equal educational opportunities and benefits as those available to non-disabled students.**

**The absence of baseline data, the lack of clarity regarding the relationship of MPI to proficiency, and the discriminatory exclusion of students with disabilities is unacceptable. The failure to provide this information violates the law and prevents meaningful stakeholder consultation. All these issues must be addressed in the next version of the MO plan and an additional 30-day comment period should be provided so stakeholders have an opportunity to respond.**

**In addition, we believe that MO should set the same long-term goals for all subgroups and should make a commitment not to reset goals and interim targets downward when/if actual performance falls short of the targets. Re-setting targets for lack of progress renders the long-term goal meaningless.**

### **Indicators (page 19)**

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: As discussed earlier, MO plans to use MPIs rather than proficiency rate for academic achievement, which raises a concern because the MPI doesn't necessarily equate to proficiency. **Also, the plan talks only about the application of this indicator for Title I schools. However, academic achievement can impact identification of schools for targeted support and improvement even if they are not Title I schools.**

Other academic indicator: MO is planning to use student growth for this indicator that applies to elementary schools and middle schools. To measure growth, MO plans to use a Valued Added Model (VAM) that compares individual student results to predictions based on statewide results in ELA and mathematics. MO will use a combined 3-year Normal Curve Equivalent (NCE) average from each content area. MO will rank the summed NCEs.

**This complicated growth indicator is sure to confuse and confound most stakeholders. MO should explain this more fully and provide examples to assist with understanding.**

Graduation Rate: **MO plans to use only the 4-year adjusted cohort graduation rates (ACGR), a decision we strongly support.**

School Quality or Student Success Indicator (SQSS): For the SQSS indicator, MO plans to use the average of three years of data to determine the percent of students attending school at least 90% of the time. An NCE will be calculated and will be ranked. **As with the other academic indicator, this indicator should be more**

fully explained and examples provided. Presenting information in a manner that is likely to leave most stakeholders confused is insulting.

**Annual Meaningful Differentiation of Schools (page 22)**

MO will differentiate all public schools in the state using the indicators described previously to create an index for each school and an index for each student subgroup at each school. **Although, the subgroups will each have an index, it is unclear whether the subgroup indices will impact whether a school is considered to be in the lowest performing 5% of Title I schools. The next version of the plan must describe how the results for each subgroup will be factored into this part of the accountability system. Another considerable concern is that the description of how the index scores will be calculated is too complicated to be understood by most stakeholders, thereby defeating the purpose of a transparent rating system.**

**Weighting of Indicators (page 24)**

This chart provides a breakdown of the relative weights of the components in the accountability system:

Indicator	EL present	EL fewer than 30 (minimum n)
Academic Achievement	4	5
English language arts (2)		
Mathematics (2)		
Academic Progress / Grad. Rate	3	3.75
English Language Acquisition	2	-
Progress to Proficiency (1.2)		
Growth (.5)		
Participation (.3)		
Attendance	1	1.25
Total Summative Rating	10	10

**This weighting system gives substantial weight to the academic indicators, which is required by ESSA.**

**Different Methodology for Certain Types of Schools (page 30)**

The MO plan does not answer the question about whether it will be using different methodologies for certain types of school. We are assuming this means that all schools will use the same methodology for accountability determinations. **If this is not the case, the next version of the plan must provide a detailed answer to this question. The schools discussed under Additional Statewide Categories of Schools should be included here.**

**Identification of Schools (page 24)**

Comprehensive Support and Improvement (page 24)

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 MO plan says it will identify the lowest 5% of schools of Title I schools, which is the correct application of the law.

**Public high schools failing to graduate at least one-third of its students:** The MO 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 MO is focusing on the 4-year ACGR for CSI identification, rather than including extended rates. This puts the emphasis on on-time graduation. However, we are concerned that the plan states that a school must fail to graduate a third or more of its students for three years before identification for CSI on the basis of graduation rate will occur (in another part of the discussion a three year average is described, which is different but still troublesome). It is unacceptable for students in schools with low graduation rates to have to wait three years or more before their school gets a CSI plan. Also, 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. MO has decided to adhere to this minimum requirement whereas some other states are electing to identify schools more frequently. **The combination of requiring three years of graduation data and only identifying schools for CSI once every three years can leave very low-performing schools without the necessary interventions for a long time.**

#### Targeted Support and Improvement (page 25)

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).

**The TSI category is critical to getting needed attention focused on students with disabilities. However, few schools would be considered for TSI since the N size proposed by MO will exclude many schools from accountability for the students with disabilities subgroup.**

**Consistently underperforming subgroups:**

The MO draft plan defines a school with a consistently underperforming subgroup as a school in which a subgroup's performance is "congruent with schools identified for Comprehensive Support and Improvement for two consecutive years." **We agree that the time period should be two consecutive years, but the rest of MO's definition is inconsistent with ESSA.**

Low-performing subgroups are determined using a comparison to the all student group at the lowest performing 5% of Title I schools and therefore have a connection to the CSI criteria. However, consistently underperforming subgroups are not supposed to perform as poorly as low-performing subgroups before schools receive a TSI plan. Therefore, there should be no relationship between consistently underperforming subgroups and the criteria used for CSI. **We recommend that a consistently underperforming subgroup be defined as a subgroup that has not met, or is not on track to meet, all of the state defined long-term goals or interim measures for that subgroup for two consecutive years. Schools with one or more consistently underperforming subgroup(s) must be identified annually beginning in 2019-2020.**

**Additional Targeted Support (schools with a low-performing subgroup or subgroups):** MO's plan defines low-performing subgroups by saying the following

"Again, in accordance with federal law, beginning in 2018, any school that has one or more subgroups of students which, on its own, would lead to identification for Comprehensive Support and Improvement will be identified for additional Targeted Support."

**Additional Statewide Categories of Schools** (page 26): The MO plans describes an additional category of schools that will get CSI plans as follows:

"This category of schools will be comprised of schools that would otherwise be included in Comprehensive Support and Intervention that administer no assessments (MAP grade level assessments or WIDA ACCESS 2.0©) and have only a single indicator of school quality or success. In this example, schools will have only attendance data available to make a determination about identification. If a school that administers no assessments has a chronic absenteeism rate consistent with the schools identified for comprehensive support and improvement, MO-DESE will assign an ASI to further analyze the school before identification. At a minimum, analysis will be based on a site visit and analysis of students' academic outcomes in subsequent grade levels. Following analysis, the school will be identified for improvement if advisable.

## **Annual Measurement of Achievement –At least 95% Participation Rate Requirement (page 26)**

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).

**The MO plan states that** any school with less than a 95 % participation rate in English language arts (ELA) or Math will automatically fail to earn points for academic achievement in the state's system for meaningfully differentiating schools. MO will utilize the same criteria for any subgroup(s), for which the rate falls below 95%.

**If MO means that the school will get a zero for the achievement indicator if the 95% participation rate is not met for all students or any subgroup, then that is a strong consequence. We do not believe a school should get a satisfactory rating if this requirement is not met and earning zero points for achievement would likely have that impact on the school rating. However, if MO merely means that non-tested students will be counted as non-proficient if the 95% participation requirement is not met, then the plan does not meet the requirements of the law for describing how the failure to meet the requirement will factor into the accountability system. Counting non-tested students as non-proficient once test participation falls below 95% is a requirement for every state. In addition to that consequence, ESSA requires states to describe how the failure to meet the requirement will impact their accountability system in another way.**

**We also 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.**

### **Exit Criteria (page 27)**

**The exit criteria, especially for TSI, are extremely complicated and confusing. MO should provide further explanation, including examples.**

### **School Conditions (page 33)**

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 MO plan mentions Multi-tiered System of Support that includes Positive Behavior Interventions and Supports, but otherwise talks only about the delivery system for professional development instead of the content. There is no recognition in the MO plan of the increased risk students with disabilities face with respect to the activities that negatively impact school conditions: (i) incidences 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.

**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 MO'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 33)**

MO should add language to its plan describing how it will ensure that the needs of all students with disabilities, including those with intellectual disabilities, will be addressed in the initiatives described in this section, including the Missouri Post-Secondary Success Project (MPSS).

#### **Children and Youth who are Neglected, Delinquent, or At-Risk (page 38)**

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>) **32%** of students served under Subpart 1 in MO in 2013-14 had IEPs and **15%** of students served under Subpart 2 had IEPs. **The MO 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 41)**

From pages 41 through 46, the MO draft plan describes initiatives to support effective instruction. Only a few of these, from the bottom of page 43 through the middle of page 44 and a sentence about teacher preparation on page 46, seem to impact students with disabilities and special educators.

**It is important for the MO plan to articulate how the initiatives it describes will 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. The inclusion data for MO demonstrates an urgent need for improvement.**

According to the 2016 IDEA Part B Data Display for students age 6-21, MO is below the national average for the percentage of students who are in the general education classroom 80% or more of their school day—**for all but one disability category** (Deaf-Blind students). The percentage is only 8.5% for students with intellectual disabilities, less than half the national average. The percentage is only 4.7% for students with Multiple Disabilities. 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

#### **Improving Skills of Educators (page 43)**

This section of the plan is supposed to describe how MO 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. **On page 44, after a description of a couple of training initiatives, MO includes the following statement, which raises grave concerns: “These effective practices and strategies will provide rich resources for meeting the goals of students with disabilities with the exception of those students with the most significant cognitive disabilities.”** The initiatives to support effective instruction should be designed to benefit **all learners**, especially those described in this section of the plan. It is unacceptable for MO to exclude students with the most significant cognitive disabilities from its discussion of how it will support effective instruction. This must be addressed in the next version of the plan.

#### **Student Support and Academic Enrichment Grants (page 50)**

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, in spite of this research and the very low rates of inclusion in MO, 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. (IDEA) MO has a State Systemic Improvement Plan (SSIP) for students with disabilities under IDEA. **As part of its SSIP MO identified a State Identified Measureable Result (SiMR) to increase the percent of students with disabilities in tested grades who will perform at proficiency levels on state assessments in reading/language arts and mathematics in the Collaborative Work pilot schools by 6.5 percentage points by 2018. The draft ESSA plan does not mention this goal, nor explain how the ESSA plan will help MO meet it. This omission should be addressed in the next draft of the plan.**

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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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