



Comments to North Carolina draft ESSA state plan

October 15, 2016

North Carolina draft plan on which these comments are based can be found at <http://www.ncpublicschools.org/docs/succeeds/draft-state-plan.pdf>

UPDATE: Final ESSA plans must be submitted using the Consolidated State Plan Template provided by the USEd at <http://www2.ed.gov/policy/elsec/leg/essa/essa-consolidated-state-plan-final.docx>.

States have two possible submission dates for their ESSA plans – **April 3, 2017** or **September 18, 2017**. The U.S. Department of Education has asked that each state notify its Office of State Support (OSS) program officer via the state mailbox by **January 10, 2017**, indicating the date the state will submit its consolidated state plan or individual state plans. You should ask TDOE the date that it will submit its plan to USEd.

Timeline: It seems that after the draft plan is amended based on stakeholder input there will not be another round of input meetings---this is a problem because much info is missing from the draft.

Standards for Students with Disabilities (SWDs)

Plan language: The plan talks about every student graduating prepared for postsecondary education and work. It also talks about the NC State Improvement Plan's focus on promoting college- and career-readiness in reading and mathematics for SWDs and the graduation rates of SWDs. It goes on to talk about a Future Ready Occupational Course of Study (FR-OCS) for certain SWDs. However, it also states that this pathway to a regular diploma is not available to students who take alternate assessments because they don't get a diploma.

Concerns:

- ESSA says that states cannot preclude students who participate in an

alternate assessment from attempting to meet the requirements of a regular high school diploma. However, the NC plan is saying that these students do not get a diploma. That language means they are precluded from attempting to meet the requirements of a regular high school diploma, in violation of ESSA.

- FR-OCS may lower expectations and academic attainment for SWDs who should be using the same pathway to a diploma as students without disabilities.

Plan language: The plan still talks about using “extended content standards” for students who take alternate assessments. Under ESSA the state is required to promote progress in the general education curriculum. There is only one general education curriculum and it is based on the full set of state content standards. The expectations for achievement on those standards is different for students who take the alternate assessment and the work can be adapted/modified, but instruction and assessment still should be tied to the same state content standards (for the grade in which the student is enrolled) that are used for all other students. The term extended standards usually implies below grade level content.

Universal Design for Learning

Plan language: The plan has 2 pages of information on implementing UDL

Concern: is this UDL implementation actually happening?

Assessments:

Alternate assessment based on extended standards: see concerns above

Many key assessment topics have placeholders

Accountability placeholders

No info provided on:

- ☐ ACCOUNTABILITY INDICATORS AND WEIGHT ASSIGNED TO EACH
- ☐ SUBGROUPS
- ☐ MINIMUM N SIZE
- ☐ DOUBLE TESTING IN GRADE 8 MATH
- ☐ MEANINGFUL DIFFERENTIATION OF SCHOOLS
- ☐ PARTICIPATION RATE INCLUSION IN THE ACCOUNTABILITY MODEL

DATA AVERAGING, IF APPLICABLE

INCLUSION OF ALL SCHOOLS IN THE MODEL

State defined indicator of school quality of student success

Plan language: States get to pick at least one school quality or student success indicator on which the school rating is determined. These are the indicators being considered by NC. The indicator(s) chosen should have evidence supporting a connection to improved student outcomes, should apply to all student subgroups and be measurable.

Chronic Absenteeism

Attendance

Student Engagement

Student Participation in Co-Curricular Activities

Physical Activity

Student Participation in the Arts

Student Suspensions

Teacher Engagement

Parent Involvement

End-of-Grade and End-of-Course Science Test Scores

College and Career Readiness Index (AP and IB Scores, ACT, ACT WorkKeys, Career and Technical Education Credentials, College Credit, etc.)

Diploma Endorsements

Promotion from 8th grade to 9th grade

Concerns: Some indicators on the list are not clearly linked to improved student outcomes and some are difficult to measure (e.g. surveys re student or teacher engagement or parent involvement are not reliable; how is physical activity measured-especially for someone with physical disabilities). What are co-curricular activities? Are they extra-curricular activities? What evidence links the full range of activities to student achievement? Are students with disabilities included in these activities regardless of the type of disability?

Comprehensive Support and Improvement

Plan language: NC proposes to identify schools for Comprehensive Support and Improvement (CSI) beginning with the XXXX-XX school year based on accountability data collected in XXXX-XX. NC believes this is a reasonable timeline since the new accountability model aligned to ESSA requirements will be implemented for the first time in the XXXX-XX school year (contingent upon USED approval) and more than one year of data is needed to appropriately identify schools.

Concern: NC is trying to hold off on having to identify schools for CSI for longer than provided in the statute.

Plan language: The number of schools identified as CSI will be equal to or greater than the lowest five (5) percent of all Title I schools and will be comprised of Title I schools and Title I eligible high schools based on one of the following:

Lowest performing schools based on proficiency

Lowest-performing schools based on graduation rate

Concern: Comprehensive support and improvement for graduation rate is not supposed to be limited to Title I schools

Missing plan language: nothing in plan about criteria for identifying CSI schools or for exiting CSI

Targeted Support and Improvement

Plan language: NC will identify schools for Targeted Support and Improvement (TSI) beginning with the XXXX- XX school year based on accountability data collected in XXXX-XX. NC believes this is a reasonable timeline since the new accountability model aligned to ESSA requirements will be implemented for the first time in the XXXX-XX school year (contingent upon USED approval) and more than one year of data is needed to appropriately identify schools.

Concern: NC is trying to hold off on having to identify schools for Targeted Support and Improvement (TSI) for longer than provided in the statute.

Plan Language: The number of schools identified as TSI schools will be equal to at least ten (10) percent of Title I schools with “consistently underperforming” subgroups of students. NC defines consistently underperforming schools as schools with performance gaps between the highest performing subgroup and the lowest performing subgroup in the school when compared to a two- year state average gap are above the state average. The “all students” subgroup is not included in the gap analysis.

Concerns:

- ALL consistently underperforming schools are supposed to be identified for

TSI, not just “ at least 10% of Title I schools with a consistently underperforming subgroup of students ”

- Underperforming should not be determined by a comparison to the other subgroups in the school. What if all the subgroups are doing poorly and the gap between them is small, does this mean none of the subgroups are underperforming. ANY subgroup that does not meet state academic goals should be considered underperforming.
- It should be more clearly stated that “consistently” means over a two year period.

Missing Information: more info to come on criteria for identifying TSI schools and criteria for exiting TSI.

Supporting Excellent Teachers

Plan language: only analyzes distribution of inexperienced teachers to schools with high populations of students who are economically disadvantaged or from minority groups

Concern: It is very important (and required) to do this equity analysis but NC can do more than ESSA requires by also looking at whether SWDs are being taught by more inexperienced teachers.

Supporting ALL Students

Plan language: no mention of increased inclusion in general education classes (not required by ESSA but decades of evidence shows the connection between improved academic achievement and positive postschool outcomes—these are the goals of ESSA)

Concern: NC needs to address segregation of students with disabilities

Plan language: no mention of strategies to reduce aversive behavior interventions (e.g. restrain and seclusion)

Concern: Strategies to improve student outcomes by reducing aversive behavior interventions is in ESSA and has a huge impact on students achievement and well-being.

List of External Stakeholders

Plan language: Disability Rights NC and the Exceptional Students Assistance Center are listed as external stakeholders involved in plan development

Concerns: Were they included in meaningful ways?

Ricki Sabia
Senior Education Policy Advisor
National Down Syndrome Congress
PH: 301-452-0811
Email: ricki@ndscenter.org
See ESSA resources at <https://www.ndscenter.org/political-advocacy> (click on
policy documents and webinar archives)

Candace Cortiella
Director
The Advocacy Institute
PH: 540-364-0051
Email: Candace@advocacyinstitute.org
See ESSA resources at www.advocacyinstitute.org/ESSA

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