



Analysis of Ohio's First Draft ESSA Plan

Ohio Dept. of Education ESSA page: <http://education.ohio.gov/Topics/Every-Student-Succeeds-Act-ESSA>

Draft plan: <http://education.ohio.gov/getattachment/Topics/Every-Student-Succeeds-Act-ESSA/essa-consolidated-state-plan.pdf.aspx>

Survey open until March 6, 2017: <https://www.surveymonkey.com/r/ESSAOhioOverview>

Ohio plans to submit its plan to U.S. Department of Education (USED) on April 3, 2017.

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

Long-term Goals (page 6)

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. See this paper for information on goal setting:

<https://edtrust.org/students-cant-wait/settinggoals-accountability>.

Academic Achievement

Ohio proposes to set its long-term timeline for improvement goals at 10 years.

The long-term goal for each of the required subgroups was set to cut the gap between the baseline proficiency rate and 100% proficiency in half by the end of the 2025-2026 school year (or 80% if calculation exceeds 80%).

The subgroup for students with disabilities (SWD) is the lowest performing at baseline and at end of 10 years for both English Language Arts (ELA) and Math. The gap between All Students and SWDs is narrowed but not by a lot.

There should be a commitment added to the plan to hold targets steady; not reset downward when/if actual performance falls short of the targets. Constantly re-setting targets renders the long-term goal meaningless.

Graduation

The timeline for improvement is 10 years and the long-term goal for 4-year Adjusted Cohort Graduation Rate (ACGR) is stated as 93%.

The long-term goal for each of the required subgroups was set to cut the gap between the baseline and 100% in half by the end of the 2025-2026 school year (or 93% if calculation exceeds 93%)

Question: Why are subgroup goals calculated using goal of 100% instead of 93% if the goals for the 4-year ACGR is 93%?

The 5-year ACGR goal is set at 95%. Same question as above regarding subgroup goal calculation.

There should be a commitment in the plan to hold targets steady; not reset downward based on actual performance.

State Non-Academic Indicators (page 13)

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, including a summative score. 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 achievement and graduation rate.

Ohio has selected two non-academic indicators:

Student engagement measured by considering chronic absenteeism and student discipline incidents,

- The chronic absenteeism long-term goal for all students is 5%. The long-term goal for each required subgroups was set to cut the chronic absenteeism rate in half by the end of the 2025-2026 school year.

This goal-setting approach should be questioned because it leaves several subgroups – including SWDS – far above the 5% overall goal at the end of 10 years. Setting the goal at

5% for each subgroup would be more appropriate. While this approach would require significantly greater reductions for certain subgroups (e.g., those with exceedingly high rates of absenteeism), it would encourage more focus on the subgroups most in need, including students with disabilities

- State percentage of graduates meeting Ohio’s Prepared for Success standards. Measures graduates who are remediation-free on all parts of ACT/SAT, who earn an honors diploma, or who earn an industry-recognized credential. The long-term goal for all students is designed to align with the current Report Card requirements, which requires a Prepared for Success percentage of at least 93% in order to earn a letter grade of “A” for this component. The long-term goal for each of the required subgroups was set to cut the gap between the baseline and 100% in half by the end of the 2025-2026 school year.

Consultation and Performance Management (page 15)

Ohio should be commended for providing ESSA information and surveys in Spanish. Equally commendable is the series of discussion guides and webinars the Ohio Department of Education (ODOE). made available for the public. The information presented in these guides provided an understanding of essential components of ESSA, allowing for more informed input from stakeholder.

ESSA requires meaningful consultation with civil rights organizations, including those representing students with disabilities, in the development of the state plan. The Ohio plan states that the ODOE met with nearly 70 groups across Ohio to discuss the changes resulting from ESSA and gather initial thoughts from the field and stakeholders. The list of organizations participating in these meetings (pages 16-17) is impressive; however, **it does not list the state Parent Training and Information Center, the Ohio Coalition for the Education of Children with Disabilities. In fact, the only group listed that would represent the interest of SWDs is the State Advisory Panel for Exceptional Children (item 60). ODOE must do a better job of consulting with organizations representing students with disabilities.**

Monitoring (page 25)

Ohio is to be commended for expanding efforts to ensure improved support services and outcomes for vulnerable students, by adding programmatic staff to the Office of Improvement and Innovation. Positions to support students involved in the justice system and a rural education liaison will join the recently hired foster care liaison and the Department’s homeless liaison. Students with disabilities are disproportionately represented in the juvenile justice system, children in foster care and children who are homeless. We recommend that Ohio further enhance these efforts by creating strong relationships between these staff members and the Office for Exceptional Children.

Academic Assessments

ESSA requires states to define “students with the most significant cognitive disabilities” for IEP team guidance on making decisions about which students will participate in the state’s alternate assessment aligned with alternate academic achievement standards. Also, ESSA set 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, Ohio should address the definition of students with the most significant cognitive disabilities and strategies the state will employ to not exceed the 1% cap on alternate assessments in the plan and encourage stakeholder input. It is critically important to ensure that the alternate assessment is used for the 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.

Accountability, Support, and Improvement for Schools

Accountability System

Ohio’s accountability system assigns A-F letter grades for 10 measures. These 10 measures are rolled up into six components that are used to issue an overall, summative grade.

The term *indicator* in Ohio’s Report Card is used differently than in the ESSA requirements.

Assessment Participation (page 41)

ESSA requires the assessment of at least 95% of all students and at least 95% of each student subgroup. The failure to meet this requirement must be factored into the accountability system.

The plan states that:

- Per state law and to comply with the participation requirements in ESSA, untested students are included in the calculation and are assigned a value of zero points for every percent of tests not taken.
- All subgroups continue to be expected to assess at least 95% of their students in each subgroup on the state’s ELA and math assessments. Once the preliminary letter grade is issued, each of the 10 federally recognized subgroups with sufficient size is evaluated for participation in ELA and also in mathematics to determine if at least 95% of the subgroup took the required assessment. If even one subgroup fails to meet the 95% participation requirement, the final letter grade is reduced by one level.

This is an aggressive position, which will protect from students being deliberately excluded from assessments. However, the impact of this position is weakened by the N size required for the participation rate of a subgroup to be counted (see the discussion under Minimum Number of Students).

Subgroups (page 44)

The plan states that Ohio does not include students in the students with disabilities subgroup once they exit special education.

We think this is the correct position to take on this option and should remain in the final plan submitted to USED.

Minimum Number of Students- N-size (page 45)

The N-size determines whether data for the disability subgroup will be reported at each school, how many schools will not be held accountable for the disability subgroup, and how many individual students with disabilities will be left out of the accountability system. If a school does not have a number of students with disabilities equal to or greater than the N-size in the assessed grades, many requirements of ESSA for the disability subgroup won't apply. For example, if the N-size is 30 and the number of students with disabilities in the assessed grades at a school is 29, the school will not be identified for a targeted support and improvement plan if the subgroup is consistently underperforming (as would be required in schools where the N-size has been met or exceeded).

The plan states that

- Ohio will use 15 accountable students as the minimum size to evaluate a subgroup (N-size) for the Gap Closing component.
- The N-size for reporting purposes is 10 to protect student privacy.

Questions: What is meant by “accountable” students? Why is the n size only for the Gap Closing component? What about academic achievement and graduation?

- For participation, an N-size of 40 is proposed. This is the subgroup size used currently and it's the size approved in Ohio's ESEA flexibility waiver. This calculation determines whether at least 95% of the students in each of the 10 federally recognized subgroups took their required ELA and math assessments. Ohio will keep its current minimum size to ensure that the calculation is statistically valid. In no case will a single untested student affect a school or district's grade, but as few as three untested students may have an effect if the subgroup is small.

This is unacceptable! N-size for participation should be the same as (or lower than) the N-size for achievement and graduation.

Weighting of each indicator (page 49)

This section of the plan is confusing. The table on page 49 is the weighting required by state regulations and it does not give sufficient weight to the academic achievement, academic

progress and graduation rate indicators. The weighting of indicators *required under ESSA* must be addressed.

Schools that are designed to serve special populations (page 52)

The plan states:

In some cases, Ohio ensures accountability for all students by requiring the resident district to maintain accountability for the student in situations where he or she is attending school elsewhere. For example, many districts participate in cooperative programs where they partner with their local Department of Developmental Disabilities office to provide comprehensive services to their students with the most significant cognitive disabilities. In those cases, each sending district is responsible for the achievement and progress of its students and they are included in their resident district's report card calculations. At the state level, Ohio's State School for the Blind and School for the Deaf report the same student-level data that all other public districts report. Ohio's Department of Youth Services operates schools for Ohio's incarcerated youth and they too report data about the students they serve.

This is an appropriate way to ensure that all districts are held accountable for students in their district regardless of where they may be placed for instructional purposes. It maintains a sense of responsibility in districts that place students into other facilities due to significant needs.

Identification of Schools (page 53)

Comprehensive Support and Improvement (CSI)

The plan states that schools for CSI are:

- 5% lowest performing schools based on the overall summative Report Card grade; or
- Schools with a four-year cohort graduation rate of less than 67%; or
- Beginning with the update that will take place after the 2020-2021 school year, schools that previously were identified for targeted support because one or more student subgroups was performing at a level similar to the lowest 5% of schools (based on individual subgroup performance) and the subgroup did not show improvement by the end of the third year after being identified for targeted support.

ESSA clearly states:

The lowest performing 5% of Title I schools must be identified for CSI. If the state elects to identify additional schools beyond this requirement, ie, non-Title I schools, it must ensure that the lowest performing 5% of Title I schools are included in those identified. Only Title I schools are to receive Title I funds for CSI;

High Schools with 4-year ACGR of 67% or less must be identified for CSI. Ohio should change its plan to reflect this and also to ensure that all High Schools are included (including those w/ 65% ACGR);

Schools with chronically low-performing subgroups (previously those with low-performing subgroups) are based upon performance compared to performance of all students, not student subgroups. Ohio should correct this.

Ohio should eliminate the “or” connector since a school can be identified for more than one of the factors.

Targeted Support and Improvement (TSI)

The plan states that:

The Department will base criteria for identifying the Focus schools (Targeted Support) on the revised Report Card measures, which will be reviewed annually:

- Schools that earn a grade of a D or F for the Gap Closing report card component two consecutive years;
- Schools that have one or more student subgroups that fail to meet specific locally determined improvement goals for three consecutive years; and
- Schools that do not meet multiple student subgroup performance benchmarks.
- Schools identified for the first time as having one or more student subgroups performing at a level similar to the lowest 5% of schools (based on individual subgroup performance).

ESSA requires the identification for TSI to be based only on:

- **Any school with one or more consistently underperforming subgroups.**
- **Any school in which one or more subgroups of students is performing at or below the performance of all students in the lowest performing schools.**

Therefore, identification of schools that earn a grade of D or F is not required. Also, low performing subgroups are identified compared to performance of all students, not the individual subgroups. This is a critical distinction and should be corrected.

See the U.S. Dept. of Education’s [Timeline for identification of schools for support and improvement](#)

Supporting All Students

Ohio provides extensive narrative regarding support for students with disabilities at page 94 of the draft plan. **However, there is no mention of the State Systemic Improvement Plan (SSIP) for students with disabilities and how the goals of the SSIP will be integrated with the ESSA plan.**

In response to the question:

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

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

The plan states “A portion of state, Title IV, Part A funds will be used to support related activities such as the piloting of school climate surveys.”

Ohio provides an overly broad answer with no specificity regarding students with disabilities who are disproportionately impacted by bullying, harassment, discipline practices and aversive behavioral interventions. Ohio should be encouraged to provide more specifics regarding SWDs. In addition, in both the Supporting Excellent Educators and Supporting All Students sections of the plan Ohio should discuss building capacity for and the implementation of Universal Design for Learning (www.udlcenter.org) and inclusive best practices. Both UDL and Inclusion have been shown to improve student outcomes for students with and without disabilities.

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

© 2017 National Down Syndrome Congress and The Advocacy Institute