



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF ELEMENTARY AND SECONDARY EDUCATION

December 19, 2017

The Honorable Chris Reykdal
Superintendent of Public Instruction
Washington Office of Superintendent of Public Instruction
600 Washington Street, S.E.
Olympia, WA 98504-7200

Dear Superintendent Reykdal:

Thank you for submitting Washington's consolidated State plan to implement requirements of covered programs under the Elementary and Secondary Education Act of 1965 (ESEA), as amended by the Every Student Succeeds Act (ESSA), and of the amended McKinney-Vento Homeless Assistance Act (McKinney-Vento Act).

I am writing to provide initial feedback based on the U.S. Department of Education's (the Department's) review of your consolidated State plan. As you know, the Department also conducted, as required by the statute, a peer review of the portions of your State plan related to ESEA Title I, Part A, ESEA Title III, Part A, and the McKinney-Vento Act using the Department's *State Plan Peer Review Criteria* released on March 28, 2017. Peer reviewers examined these sections of the consolidated State plan in their totality, while respecting State and local judgments. The goal of the peer review was to support State- and local-led innovation by providing objective feedback on the technical, educational, and overall quality of the State plan and to advise the Department on the ultimate approval of the plan. I am enclosing a copy of the peer review notes for your consideration.

Based on the Department's review of all programs submitted under Washington's consolidated State plan, including those programs subject to peer review, the Department is requesting clarifying or additional information to ensure the State's plan has met all statutory and regulatory requirements, as detailed in the enclosed table. Each State has flexibility in how it meets the statutory and regulatory requirements. Please note that the Department's feedback may differ from the peer review notes. I encourage you to read the full peer notes for additional suggestions and recommendations for improving your consolidated State plan.

ESEA section 8451 requires the Department to issue a written determination within 120 days of a State's submission of its consolidated State plan. Given this statutory requirement, I ask that you revise Washington's consolidated State plan and resubmit it through OMB Max by January 4, 2018. We encourage you to continue to engage in consultation with stakeholders, including representatives from the Governor's office, as you develop and implement your State plan. If you would like to take more time to resubmit your consolidated State plan, please contact your Office of State Support Program Officer in writing and indicate your new submission date.

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Please recognize that if we accommodate your request for additional time, a determination on the ESEA consolidated State plan may be rendered after the 120-day period.

Department staff will contact you to support Washington in addressing the items enclosed with this letter. If you have any immediate questions or need additional information, I encourage you to contact your Program Officer for the specific Department program.

Please note that the Department only reviewed information provided in Washington's consolidated State plan that was responsive to the Revised Template for the Consolidated State Plan that was issued on March 13, 2017. Each State is responsible for administering all programs included in its consolidated State plan consistent with all applicable statutory and regulatory requirements. Additionally, the Department can only review and approve complete information. If Washington indicated that any aspect of its plan may change or is still under development, Washington may include updated or additional information in its resubmission. Washington may also propose an amendment to its approved plan when additional data or information are available consistent with ESEA section 1111(a)(6)(B). The Department cannot approve incomplete details within the State plan until the State provides sufficient information.

Thank you for the important work that you and your staff are doing to support the transition to the ESSA. The Department looks forward to working with you to ensure that all children have the opportunity to reach their full potential.

Sincerely,

/s/

Jason Botel
Principal Deputy Assistant Secretary,
Delegated the authority to perform the
functions and duties of the position of
Assistant Secretary, Office of
Elementary and Secondary Education

Enclosures

cc: Governor
State Title I Director
State Title II Director
State Title III Director
State Title IV Director
State Title V Director
State 21st Century Community Learning Center Director
State Director for McKinney-Vento Homeless Assistance Act: Education for Homeless
Children and Youths Program

Items That Require Additional Information or Revision in Washington’s Consolidated State Plan

Title I, Part A: Improving Basic Programs Operated by Local Educational Agencies (LEAs)	
A.4.iii.c.1: English Language Proficiency Long-term Goals	The ESEA requires a State to identify and describe its ambitious long-term goal and measurements of interim progress for English learners for increases in the percentage of such students making progress in achieving English language proficiency. In its State plan OSPI provides baseline data, measurements of interim progress, and a long-term goal for the percentage of students transitioning out of English learner status (what OSPI refers to as the transition rate), but does not provide baseline data, measurements of interim progress, or a long-term goal for increases in the percentage of English learners making progress in achieving English language proficiency. Therefore, it is unclear whether OSPI meets the statutory requirements.
A.4.iv.c: Graduation Rate Indicator	The ESEA requires a State to describe a Graduation Rate indicator that includes the four-year adjusted cohort graduation rate and, at the State’s discretion, one or more extended year adjusted cohort graduation rates. The ESEA also requires that the Graduation Rate indicator is consistent for all public high schools, in all LEAs, across the State. OSPI describes an upward adjustment for schools that graduate relatively high percentages of students beyond four years. However it is not clear how that upward adjustment will be calculated, and how it will be calculated consistently across the State consistent with statutory requirements.
A.4.iv.e: School Quality or Student Success Indicator(s)	The ESEA requires that a State describe a School Quality or Student Success indicator that can be measured statewide and is comparable for the grade spans to which the indicator applies and that will allow for meaningful differentiation in school performance. OSPI proposes including a measure of dual credit participation for students in grades 9-12, but does not fully describe how the indicator is calculated and whether it includes all students in the State (not just students enrolled in a dual credit course). As a result, it is not clear that this indicator is valid, reliable, statewide, and comparable, and allows for meaningful differentiation.
A.4.v.c: If Applicable, Different Methodology for Annual Meaningful Differentiation	The ESEA requires a State to include all public schools in its system of annual meaningful differentiation and to describe that system in its State plan. OSPI indicates that it will use different methodologies for various types of schools, but does not describe how the methodologies will be used to identify schools for comprehensive or targeted support and improvement. Because OSPI does not describe how the methodologies will be used to identify schools for comprehensive or targeted support and improvement, it is unclear whether OSPI meets the statutory requirements.
A.4.vi.f: Targeted Support and	The ESEA requires that a State describe its methodology for identifying schools for additional

<p>Improvement Schools— Additional Targeted Support</p>	<p>targeted support and improvement in which any subgroup of students, on its own, would lead to identification as a comprehensive support and improvement school under ESEA section 1111(c)(4)(D)(i)(I). Although OSPI identifies a methodology that indicates if two or more subgroups fall below the threshold, its methodology does not appear to identify each school in which any subgroup of students, on its own, is performing as poorly as the lowest-performing five percent of schools receiving Title I, Part A funds.</p>
<p>Title I, Part C: Education of Migratory Children</p>	
<p>B.1: Supporting Needs of Migratory Children</p>	<ul style="list-style-type: none"> • OSPI describes how, in planning and implementing the Migrant Education Program (MEP), it will identify and address the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, through the full range of services that are available for migratory children from appropriate local, State, and Federal educational programs. However, the ESEA requires that a State also describe how it will evaluate the MEP in the areas described above, to ensure the unique educational needs of migratory children are identified and addressed. • The ESEA requires a State to describe how, in planning, implementing, and evaluating the MEP, it will address the unique educational needs of migratory children, including preschool migratory children and migratory children who have dropped out of school, through joint planning among local, State, and Federal educational programs serving migratory children, including language instruction educational programs under Title III, Part A; and through the integration of services available under Title I, Part C with services provided by those other programs. OSPI does not provide sufficient information addressing these requirements. • OSPI describes how, in planning, implementing, and evaluating the MEP, it will address the unique educational needs of migratory children through measurable program objectives and outcomes. However, the ESEA requires a State to also describe how it will address the unique educational needs of preschool migratory children and migratory children who have dropped out of school, through measurable program objectives and outcomes.
<p>B.2: Promote Coordination of Services</p>	<p>The ESEA requires a State to describe how the State will use Title I, Part C funds to promote interstate and intrastate coordination of services for migratory children, including how the State will provide for educational continuity through the timely transfer of pertinent school records, including information on health, when children move from one school to another, and whether such move occurs during the regular school year. The State does not provide sufficient information addressing this requirement.</p>

Title I, Part D: Prevention and Intervention Programs for Children and Youth Who Are Neglected, Delinquent, or At-Risk	
C.2: Program Objectives and Outcomes	OSPI does not provide enough details to demonstrate how each of the targets and performance indicators that the plan identifies will be used to assess the effectiveness of the Title I, Part D program in improving the career and technical skills of the children in the program. The ESEA requires each SEA to describe program objectives and outcomes established by the State that will be used to assess the effectiveness of the Title I, Part D program in improving the academic, career, and technical skills of children in the program.
Title II, Part A: Supporting Effective Instruction	
D.4: Improving the Skills of Educators	The ESEA requires the State to describe how it will improve the skills of teachers, principals, or other school leaders in order to enable them to identify students with specific learning needs and provide instruction based on the needs of such students, specifically for: children with disabilities, English learners, students who are gifted and talented, and students with low literacy levels. OSPI generally describes how it will improve the skills of educators, but it does not address each of the required subgroups of students. Therefore, it is unclear whether OSPI meets the statutory requirements.